

BEFORE THE OIL AND GAS CONSERVATION COMMISSION  
OF THE STATE OF COLORADO

IN THE MATTER OF CHANGES TO THE RULES	)	CAUSE NO. 1R
OF PRACTICE AND PROCEDURE OF THE OIL	)	
AND GAS CONSERVATION COMMISSION OF	)	DOCKET NO. 171200767
THE STATE OF COLORADO	)	
	)	RULEMAKING

**PREHEARING STATEMENT OF  
JAMES AND THERESA FITZGERALD AND GWEN LACHELT**

James and Theresa Fitzgerald and Gwen Lachelt, La Plata County residents, respectfully submit this Prehearing Statement regarding the Flowline Rulemaking.

La Plata County is home to nearly 3,500 gas and oil wells. Many residents live with gas wells and flowline infrastructure on their property, their neighbor's property and/or in their neighborhoods and subdivisions. Many of the Fruitland Formation wells and flowlines in the county are more than 30 years old. Due to the tragic deaths of two men in Firestone caused by an abandoned flowline, La Plata County's aging oil and gas infrastructure and unprecedented population growth in the county, the need for new flowline standards is paramount.

We support the following: (1) Full and public disclosure of the location of flowlines, gathering and transmission pipelines; (2) Surface owner and adjacent surface owner consultation and right to appeal regarding abandonment of flowlines; (3) local government authority to regulate flowline impacts.

**Full and public disclosure of the location of flowlines, gathering and transmission pipelines**

The COGCC reports approximately 120,000 flowlines within 1,000 feet of a home or other structure. To ensure public health, safety and welfare, oil and gas operators will disclose the location of each flowline, gathering and transmission pipeline to the COGCC and each local government in which the lines are located. The COGCC will post these locations on its website.

**Surface owner and adjacent surface owner consultation and right to appeal regarding location and abandonment of flowlines**

Oil and gas operators shall consult with surface owners and adjacent surface owners on location and abandonment of flowlines. Surface owners and adjacent surface owners will have the right to appeal to the COGCC and their local government if there is disagreement on the location and /or abandonment of a flowline.

**Local government authority to regulate flowline impacts**

The COGCC flowline rules will not erode local government authority to regulate flowlines.

We request approximately 15 minutes for presentation and cross-examination at the upcoming rule-making hearing.

Dated this 4th day of December, 2017:

Respectfully submitted,  
/s/James and Theresa Fitzgerald  
and Gwen Lachelt

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## CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2017, I placed an original and two copies in the U.S. mail, first-class postage prepaid, for delivery to:

Julie Prine, Hearing and Regulatory Affairs Manager  
Colorado Oil & Gas Conservation Commission  
Docket No. 171200767  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Electronic Copy to the COGCC:  
[DNR\\_COGCC.Rulemaking@state.co.us](mailto:DNR_COGCC.Rulemaking@state.co.us)

Electronic copies have also been submitted to the party email addresses provided, in PDF format.

/s/ Gwen Lachelt

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Gwen Lachelt