



**RECEIVED**  
JUL - 2 2013  
**COGCC**



July 1, 2013

**ORIGINAL**

Robert Frick  
Hearing Manager  
Docket No. 1307-RM-01  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Dear Robert:

Pursuant to COGCC's Prehearing Order, Garfield County is writing to request party status for the forthcoming rulemaking hearings. The following is the information requested by COGCC to process our request.

1) Name of applicant:  
Garfield County

Representatives:  
John Martin  
Chairman of BOCC

Kirby H. Wynn  
Oil and Gas Liaison

Tom Jankovsky  
Commissioner

Fred Jarman  
Director, Community Development Department

Mike Samson  
Commissioner

2) Contact information:  
Kirby H. Wynn  
Oil and Gas Liaison  
0375 County Road 352, Bldg 2060,  
Rifle, CO 81650  
(970) 625-5905 (t)  
(970) 625-5939 (f)  
kwynn@garfield-county.com

- 3) Garfield County is located in the Piceance Basin, and is host to about a quarter of the current oil and gas development activity in Colorado, based on recent well permit applications and operating drill rigs. The County's budget contains substantial revenues from this important industry and many of our citizens depend on the industry for their livelihoods.

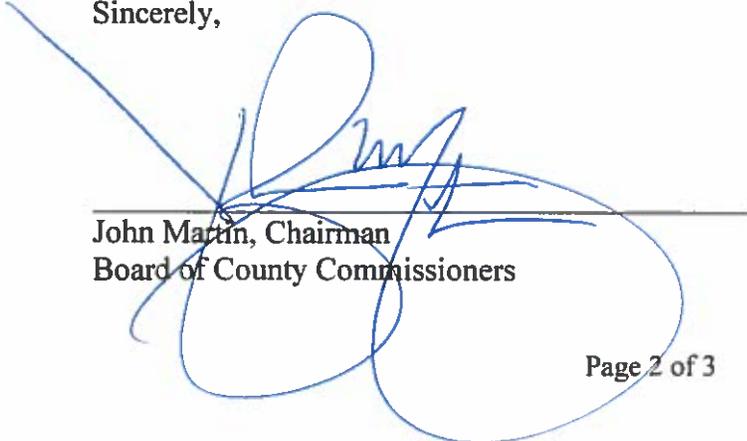
Because of the substantial presence of the industry in the County (~10,200 active oil and gas wells) and the resources we devote to managing its effects, the County is investing considerable time and effort to comment on the COGCC draft rules and to participate in the stakeholder and prehearing meetings. Garfield County agrees in principle with the current application of the wildlife-related rules and associated maps as a guide to indicate when consultations should be conducted prior to approval of location and drilling permit applications.

However, we are concerned that Colorado Parks and Wildlife (CPW) provides these same (priority) habitat maps to the Bureau of Land Management for purposes that CPW should realize will be more far-reaching, including usage to determine where and when to deny access to lands with existing and future mineral-extraction leases. The CPW maps, in particular for Greater sage-grouse (GSG) habitat are of concern and were developed using data and modeling approaches that are too generalized to be objectively applied to site-specific decisions to approve or deny permission to allow mineral extraction activity. With this concern in mind along with our stakeholder interest in seeing all mineral-extraction regulatory agencies using similar data in their decision-making processes that we will plan to present and discuss the formally-adopted Garfield County Greater Sage Grouse Conservation Plan and associated county-funded GSG maps to the Commission during the rulemaking.

All aspects of the draft regulations will affect Garfield County and our ability to provide for public health, safety and welfare to the citizens of Garfield County. Therefore, we wish to reserve the right to contribute testimony on all aspects of the draft regulations and across the full spectrum of wildlife species for which updated definitions and Sensitive Wildlife Habitat and Restricted Surface Occupancy maps are proposed for update. Assuming we are granted party status, we will - provide greater detail in our pre-hearing statement by the July 12, 2013 deadline.

Thank you for the opportunity to request party status; we endeavor to provide useful input to the Commission as it continues to refine its rules.

Sincerely,



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John Martin, Chairman  
Board of County Commissioners

  
\_\_\_\_\_  
Mike Samson, Commissioner  
Board of County Commissioners

  
\_\_\_\_\_  
Tom Jankovsky, Commissioner  
Board of County Commissioners

C: Tom Jankovsky  
Mike Samson  
Andrew Gorgey  
Frank Hutfless  
Kirby Wynn.



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



IN THE MATTER OF CHANGES TO THE RULES )  
OF PRACTICE AND PROCEDURE OF THE OIL )  
& GAS CONSERVATION COMMISSION OF THE )  
STATE OF COLORADO )

Cause No. 1R

Docket No. 1307-RM-01

**APPLICATION FOR PARTY STATUS BY**  
**ENCANA OIL & GAS (USA) INC.**

**ORIGINAL**

Encana Oil & Gas (USA) Inc. ("Encana"), by and through its undersigned attorneys, respectfully submits this Application for Party Status to participate in the prehearing process and hearing in the above referenced rulemaking.

On June 14, 2013, the Oil & Gas Conservation Commission of the State of Colorado ("Commission") issued a Notice of Rulemaking Hearing and therein established the procedural requirements for a party to participate in this rulemaking. Pursuant to the requirements of the Order, Encana submits the following information.

**1. Name of applicant:**

Encana Oil & Gas (USA) Inc.  
370 17<sup>th</sup> Street, Suite 1700  
Denver, CO 80202  
(303) 623-2300 - Main  
(720) 876-4403 - Fax  
Contact: Jason Oates  
Email: [Jason.oates@encana.com](mailto:Jason.oates@encana.com)

**2. Represented by:**

Jamie L. Jost  
Gregory J. Nibert  
Beatty & Wozniak, P.C.  
216 16th Street, Suite 1100  
Denver, Colorado 80202  
(303) 407-4499 - Main  
(303) 407-4494 - Fax  
Email: [jjost@bwenergyllaw.com](mailto:jjost@bwenergyllaw.com)

**3. Summary of policy, factual or legal issues the applicant has with the proposed regulations:**

At the time of the filing of this Application, Encana has identified the following policy, factual, and legal issues:

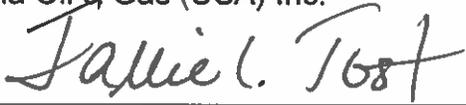
1. Whether the Rulemaking is properly positioned and/or titled to address the need for consultation by Colorado Parks and Wildlife in additional and/or expanded areas within the State of Colorado;
2. Whether the Rulemaking has accounted for the Bureau of Land Management's utilization of the sensitive wildlife habitat, priority habitat, and restricted surface occupancy maps and the potential impact of such utilization on oil and operations within the State of Colorado;
3. Whether the Rulemaking is supported by adequate evidence;
4. Whether the effective date of the Rules is feasible for compliance.

Encana reserves the right to amend, delete and/or supplement the issues identified herein and will provide greater detail in Encana's pre-hearing statement. As an oil and gas operator in the State of Colorado, the Rules will have a direct effect on the activities of Encana. Thus, Encana respectfully requests the Commission grant this Application for Party Status in the above captioned rulemaking.

DATED this 1<sup>st</sup> day of July, 2013.

RESPECTFULLY SUBMITTED,

Encana Oil & Gas (USA) Inc.

By: 

---

Jamie L. Jost  
Gregory J. Nibert  
Beatty & Wozniak, P.C.  
216 Sixteenth St. –Suite 1100  
Denver, Colorado 80202  
(303) 407-4499 – Main  
(303) 407-4494 - Fax

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of July, 2013 the foregoing document entitled **APPLICATION FOR PARTY STATUS BY ENCANA OIL & GAS (USA) INC.** was filed and served as follows:

Original and 13 copies delivered for filing to:

Robert Frick, Hearings Manager  
Docket No. 1307-RM-01  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**VIA COURIER SERVICE**

Electronic copy to Robert Frick:  
Robert.Frick@state.co.us

Electronic copy to the COGCC:  
DNR\_cogcc.rulemaking@state.co.us

  
\_\_\_\_\_

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

**RECEIVED**  
JUL - 1 2013  
**COGCC**

IN THE MATTER OF CHANGES TO THE RULES OF )  
PRACTICE AND PROCEDURE OF THE OIL & GAS )  
CONSERVATION COMMISSION OF THE STATE OF )  
COLORADO )

CAUSE NO. 1R  
DOCKET NO. 1307-RM-01

REQUEST FOR PARTY STATUS

**ORIGINAL**

1. Identifying Information

Applicant:

Colorado Petroleum Association  
ATTN: Stan Dempsey, Jr.  
1660 Lincoln Street, Suite 1460  
Denver, Colorado 80264  
Telephone: 303-860-0099  
Email: [stan@coloradopetroleumassociation.org](mailto:stan@coloradopetroleumassociation.org)

Founded in 1951, the Colorado Petroleum Association (CPA) is a statewide non-profit Colorado trade association comprised of member companies involved in every segment of Colorado's oil and gas industry, including exploration and production, refining, transportation, supplier chain, pipeline and contractors.

2. Summary of Policy, Factual and Legal Issues

CPA requests party status in the referenced rulemaking because it anticipates the proposed additions and amendments to the Rule 100 Series (Definitions), Appendix VII (Restricted Surface Occupancy Area Maps), and Appendix VII (Sensitive Wildlife Habitat Maps) of the rules of Practice and Procedure of the Commission, 2 Code Colo. Regs. 404-1 ("Commission Rules") could substantially impact its member's oil and gas operations throughout Colorado.

CPA has identified the following initial policy, factual and legal concerns:

- The proposed rules revision must be within the scope of the rulemaking notice and be consistent with the grant of legislative authority conferred to the agency;
- The proposed rules revision may present a conflict with federal lands, leases and subject matter areas occupied exclusively by federal law;

- The proposed rules revision must take into account the likely economic impacts of the changed or increased regulation, including but not limited to the possible impact on property rights, as well as existing oil and gas operations;
- The proposed rules revision, including definitions, must establish clear, objective and predictable criteria and standards for oil and gas operators and other impacted persons;
- The proposed rules revision could impose redundant, conflicting or unachievable requirements and standards for CPA member companies who operate in all of Colorado's oil and gas basins;
- The proposed rules revision must adequately demonstrate the scientific and factual basis underlying proposed changes to the existing regulatory framework.

CPA reserves the right to raise more particular issues during the rulemaking proceedings, to amend or supplement the policy, legal and factual issues presented above and to respond to the issues and proposals submitted by other parties to this regulatory proceeding.

Respectfully submitted, this 1<sup>st</sup> day of July, 2013.

By: /S/ Stan Dempsey, Jr.  
Stan Dempsey, Jr.  
President  
1660 Lincoln Street, Suite 1460  
Denver, CO 80264  
Phone: 303-324-1890  
Email: stan@coloradopetroleumassociation.org



**RECEIVED**  
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**COGCC**

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

IN THE MATTER OF CHANGES TO THE RULES )  
 OF PRACTICE AND PROCEDURE OF THE OIL )  
 & GAS CONSERVATION COMMISSION OF THE )  
 STATE OF COLORADO )

Cause No. 1R

Docket No. 1307-RM-01

**ORIGINAL**

**APPLICATION FOR PARTY STATUS BY  
 COLORADO OIL AND GAS ASSOCIATION**

Colorado Oil and Gas Association ("COGA"), by and through its undersigned attorneys, respectfully submits this Application for Party Status ("Application") to participate in the prehearing process and hearing in the above referenced rulemaking.

On June 14, 2013, the Oil & Gas Conservation Commission of the State of Colorado ("Commission") issued a Notice of Rulemaking Hearing and therein established the procedural requirements for a party to participate in this rulemaking. Pursuant to the requirements of the Notice of Rulemaking Hearing, COGA submits the following information.

**1. Name of applicant:**

Colorado Oil and Gas Association  
 Andrew Casper  
 P.O. Box 540  
 Denver, CO 80201  
 Phone: (303) 861-0362  
 Fax: (303) 861-0373  
 Email: Andrew.Casper@coga.org.

**2. Represented by:**

Elizabeth Y. Gallaway  
 Beatty & Wozniak, P.C.  
 216 16th Street, Suite 1100  
 Denver, Colorado 80202  
 Email: egallaway@bwenergyllaw.com  
 (303) 407-4499 – Main  
 (303) 407-4494 – Fax

**3. Summary of policy, factual or legal issues the applicant has with the proposed regulations:**

At the time of the filing of this Application, COGA has identified the following policy, factual, and legal issues:

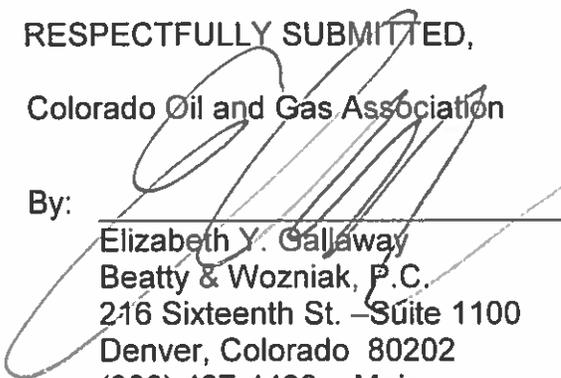
1. Whether the maps that are the subject of the Rulemaking are supported by sufficient and accurate technical and scientific data;
2. Whether the proposed amendments to habitat definitions are reasonable, necessary, and technically and scientifically supported;
3. Whether the Rulemaking has adequately considered the utilization of the sensitive wildlife habitat, priority habitat, and restricted surface occupancy maps by the Bureau of Land Management and local jurisdictions, and the potential impact of such utilization on oil and gas operations within the State of Colorado;
4. Whether Commission consultation procedures are operationally and procedurally feasible;
5. Whether the effective date of the Rules is feasible for compliance.

COGA reserves the right to amend, delete, add to, and/or supplement the issues identified herein. The Rules are likely to have a direct effect on the activities of COGA members. Thus, COGA respectfully requests the Commission grant this Application for Party Status in the above captioned rulemaking.

DATED this 1<sup>st</sup> day of July, 2013.

RESPECTFULLY SUBMITTED,

Colorado Oil and Gas Association

By: 

Elizabeth Y. Gallaway  
Beatty & Wozniak, P.C.  
216 Sixteenth St. - Suite 1100  
Denver, Colorado 80202  
(303) 407-4499 - Main  
(303) 407-4494 - Fax

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of July, 2013, the foregoing document entitled **APPLICATION FOR PARTY STATUS BY COLORADO OIL AND GAS ASSOCIATION** was filed and served as follows:

Original and 2 copies delivered for filing to:

Robert Frick, Hearings Manager  
Docket No. 1307-RM-01  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**VIA COURIER SERVICE**

Electronic copy to Robert Frick:  
Robert.Frick@state.co.us



RECEIVED  
JUL - 1 2013  
COGCC

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

IN THE MATTER OF CHANGES TO THE RULES OF PRACTICE AND PROCEDURE OF THE OIL & GAS CONSERVATION COMMISSION OF THE STATE OF COLORADO	CAUSE NO: 1R  DOCKET NO: 1307-RM-01
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REQUEST FOR PARTY STATUS OF  
CHEVRON U.S.A. INC., AND ITS AFFILIATES,  
CHEVRON MIDCONTINENT, L.P., AND FOUR STAR OIL & GAS COMPANY

ORIGINAL

COMES NOW Chevron U.S.A. Inc. and its affiliates Chevron Midcontinent, L.P., and Four Star Oil & Gas Company ("Chevron") and respectfully request pursuant to that Notice of Rulemaking Hearing, Cause 1R, Docket No. 1307-RM-01, dated June 14, 2013; and further pursuant to C.R.S. §§ 24-4-101 *et seq.*; §§ 34-60-101 *et seq.*; and 2 CCR 404-1 "Rules of Practice and Procedure before the Oil and Gas Conservation Commission of the State of Colorado" that the Oil and Gas Conservation Commission of the State of Colorado ("COGCC") grant Chevron party status in the above captioned matter, in support of which Chevron states as follows:

1. Identifying Information

Applicant:

Chevron U.S.A. Inc., and its affiliates Chevron Midcontinent, L.P., and Four Star Oil & Gas Company.

Applicant's Representatives:

Scott M. Campbell, No. 24496  
Nick A. Swartzendruber, No. 38705  
Poulson Odell & Peterson LLC  
1775 Sherman St., Ste 1400  
Denver, Colorado 80203  
Telephone: (303) 861-4400  
Facsimile: (303) 861-1225  
Email: scampbell@popllc.com  
nswartzendruber@popllc.com

## 2. Brief Summary of Policy, Factual, and Legal Issues

Chevron has preliminarily identified the following policy, factual, and legal issues relevant to the noticed rulemaking:

- The proposed rules must be within the scope of and be consistent with the Colorado Oil and Gas Conservation Act, C.R.S. §§ 34-60-101 *et seq.* including, but not limited to, the requirements that such rules:
  - Establish a “timely and efficient” process for the review of applications for permits to drill;
  - Comply with the codified Reasonable Accommodation policy and process;
  - Facilitate the exploration and production of oil and gas, prevent the waste of oil and gas for the benefit of the “public and private interests” in such oil and gas, and protect the correlative rights of owners of oil and gas; and
  - Regulate only when necessary to prevent and mitigate significant adverse environmental impacts on any air, water, soil, or biological resource resulting from oil and gas operations to the extent necessary to protect public health, safety, and welfare, including protection of the environment and wildlife resources, taking into consideration cost-effectiveness and technical feasibility.
- The proposed rules should fall within the scope of the notice of rulemaking;
- The proposed rules must take into account the likely economic impacts of the proposed rules, which otherwise appear to result in delay or disincentives to the exploration and production of oil and gas in Colorado;
- The proposed rules must clearly establish consistent, objective and predictable criteria and standards for oil and gas operators and other impacted persons;
- The proposed rules must demonstrate the need for the rules, and the scientific, technical, and factual bases supporting each rule in the context of the existing regulatory framework;
- The proposed rules appear to conflict with preemptive federal government authority over federal lands, leases and subject matter areas occupied exclusively by federal law;
- The proposed rules could impose redundant, conflicting or unachievable requirements and standards for oil and gas operators across different oil and gas producing basins;

- Numerous legal issues are presented, including, but not limited to, (i) effects on private property rights and private contracts, and (ii) compliance with the Colorado Administrative Procedures Act.

Chevron is also concerned about the time allocated for this rulemaking, and the anticipated limited time which will be allotted to the parties to address the testimony and evidence likely to be filed with the Commission. Chevron also believes that limited opportunities to conduct cross examination of witnesses, including Commission staff witnesses, is appropriate.

Chevron respectfully reserves the right to raise more particular issues during the rulemaking proceedings, to amend or supplement the policy, legal and factual issues presented above and to respond to the issues and proposals submitted by other parties to this regulatory proceeding.

DATED: July 1, 2013.

Chevron U.S.A. Inc., and its affiliates  
Chevron Midcontinent, L.P., and Four Star Oil  
& Gas Company

By:

  
\_\_\_\_\_

Scott M. Campbell  
Nick A. Swartzendruber  
POULSON, ODELL & PETERSON, LLC  
1775 Sherman Street, Suite 1400  
Denver, Colorado 80203  
Telephone: (303) 861-4400  
Facsimile: (303) 861-1225

**CERTIFICATE OF SERVICE**

I, hereby certify that on this 1st day of July, 2013, I delivered via courier, one original, and 13 true and correct copies of the above and foregoing REQUEST FOR PARTY STATUS, addressed to the following:

Robert J. Frick  
Hearings Manager  
Docket No. 1211-RM-04  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO. 80203

With an electronic copy sent to:  
DNR\_COGCC.Rulemaking@state.co.us





July 15, 2013

**VIA EMAIL**

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**RE:** *Amended Rules*, 1307-RM-01 Wildlife Maps (June 14, 2013)

Dear Sir or Madam:

Pursuant to the Colorado Oil and Gas Conservation Commission's ("COGCC" or "the Commission") request for comments and information regarding the update of sensitive wildlife habitat and restricted surface occupancy (RSO) maps of June 14, 2013,<sup>1</sup> Anadarko Petroleum Corporation ("Anadarko") respectfully submits this letter containing pertinent commercial, factual and scientific information.<sup>2</sup> This substantial information should be considered in any decision regarding planned or proposed updates to existing mapping.

Anadarko is among the world's largest independent oil and natural gas exploration and production companies. With nearly 25,000 wells operated in the U.S., Anadarko holds fee ownership of mineral rights under nearly eight million net leasehold acres, with a substantial holding located within the State of Colorado in areas which may be directly impacted by the proposed additions and amendments referenced previously. Anadarko is a stakeholder in this rulemaking as the designation of additional areas or amendments therein as sensitive wildlife habitat or RSO may affect Anadarko's ability to develop current and future mineral and lease interests.

With the objective of providing pertinent information to aid the COGCC in the review process, Anadarko analyzed the best available scientific, commercial and factual information by wildlife and biology professionals as it relates to the sensitive wildlife habitat and RSO maps. The analysis is presented below.

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<sup>1</sup> On June 14, 2013, the COGCC initiated a review of additions and amendments to the Rule 100 Series (Definitions), Appendix VII (RSO maps), and Appendix VII (Sensitive Wildlife Maps), of the Rules of Practice and Procedure of the Commission, 2 Code Colo. Regs. 404-1 ("Commission Rules"), to update the Commission's Sensitive Wildlife Habitat Maps and Restricted Surface Occupancy Area Maps ([http://www.dora.state.co.us/pls/real/SB121\\_Web.Show\\_Rule?p\\_rule\\_id=5187](http://www.dora.state.co.us/pls/real/SB121_Web.Show_Rule?p_rule_id=5187)).

<sup>2</sup> The scientific information, scientific literature review and analysis contained herein is presented by Nick Owens. Mr. Owens holds a B.Sc. in biology from Eastern Illinois University and specializes in endangered species and wildlife. His experience includes research on rare ecosystems and species across the U.S. in both terrestrial and aquatic environments.

## **INFORMATION AND ANALYSIS:**

### **Gunnison Sage-Grouse**

As it relates to proposed changes to COGCC 100-series rules for Sensitive Wildlife Habitat, the current proposed definition for “production areas” including an area that encompasses a four mile buffer on active lek sites is too broad and does not represent the best available science for this species when specifically reviewing those populations which occur in Dolores and San Miguel Counties. Commons (1997) reported minimal movements year-round for the Gunnison Sage-Grouse (*Centrocercus minimus*) in southwest Colorado. The broad brush approach of considering habitats as sensitive if they are located within four miles of a lek is a flawed approach based on inappropriate analyses as it fails to consider best available science and the specific behaviors exhibited by these populations. The proposed buffer is more appropriate for those populations occurring in the larger Gunnison Basin population where longer distance movements have been recorded. For non-migratory populations such as those in southwest Colorado this proposal is a vast overreach.

Further in review of land cover data (1999-2001) from the United States Geological Survey Gap Analysis Program (USGS, 2004) it is readily apparent that a four mile buffer around lek sites includes a large proportion of non-supportive habitats for *C. minimus*. Consideration of these habitats as “sensitive” or for use as “production areas” by this species would be arbitrary and capricious and not supported by the best available scientific information.

Lastly, clarity on the definition of what is an “active” lek site needs to be further vetted. APC suggests that the COGCC include language which indicates that a non-active lek site is one in which no activity has been recorded for a period of two consecutive years.

### **Lesser Prairie-Chicken**

As it relates to proposed changes to COGCC 100-series rules for Sensitive Wildlife Habitat, as currently drafted, the definition provides sensitive habitat for the Lesser Prairie-Chicken (*Tympanuchus pallidicinctus*) be based on focal areas derived wholly from the current *draft* version of the Western Association of Fish and Wildlife Agencies (WAFWA) Range-Wide Conservation Plan for the Lesser Prairie-Chicken. The “focal area” concept is a conservation strategy for this species and not in itself a quantifiable metric of habitat, especially “sensitive” habitats for this species. Furthermore, the strategy which provides the groundwork by which these focal areas are developed is still an unproven concept that has not been endorsed by the United States Fish and Wildlife Service. To promulgate a change to the sensitive habitat mapping based wholly on a draft document, derived from a conservation strategy and not on specific supportive habitats themselves (based on the *draft* WAFWA document in its current version would include agricultural lands, and other non-supportive habitats), and predicated upon the promise of future implementation is premature at this juncture.

Colorado Oil and Gas Conservation Commission  
Attn: 1307-RM-01 Wildlife Maps  
July 15, 2013  
Page 3

Anadarko suggests the COGCC instead utilize the Southern Great Plains Crucial Habitat Assessment Tool (CHAT) to characterize those habitats which are supportive and therefore "sensitive" in nature limiting sensitive habitats to those noted as Category 1, "irreplaceable." By utilizing this framework, the COGCC would thereby be relying on a much more scientifically valid metric for sensitive habitats and not upon an unproven conservation strategy which largely overstates potential and future supportive and/or occupied habitats.

Lastly, Anadarko would suggest removal of "core populations and habitat necessary for a viable population" from the definition and replace with "core populations and Category 1 habitats as defined by the Southern Great Plains CHAT." The term "viable population" is largely speculative and current estimates are solely based on opinion; further research and investigation is required to fully quantify this metric.

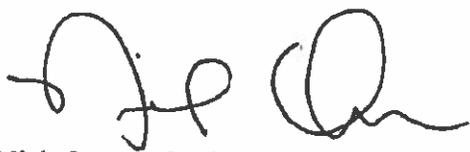
### **CONCLUSION**

Based on the best available scientific information, as summarized herein, the COGCC's updates to sensitive wildlife habitat and RSO maps are deficient both scientifically and legally. Best available science contradicts the application of one-size fits all buffers and focal areas as it relates to *C. minimus* and *T pallidicinctus*, respectively.

Anadarko appreciates this opportunity to provide you with our concerns regarding the proposed rulemaking. Please do not hesitate to contact us if you would like to discuss our comments in greater detail.

Regards,

**ANADARKO PETROLEUM CORPORATION**

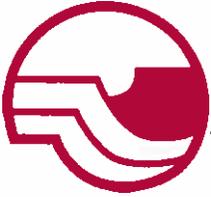
A handwritten signature in black ink, appearing to read 'Nick Owens', written in a cursive style.

Nick Owens, Senior Regulatory Analyst

Colorado Oil and Gas Conservation Commission  
Attn: 1307-RM-01 Wildlife Maps  
July 15, 2013  
Page 4

**REFERENCES**

- Commons, M. L. 1997. Movement and Habitat Use by Gunnison Sage Grouse (*Centrocercus minimus*) in Southwestern Colorado. Thesis, University of Manitoba, Winnipeg, Canada.
- USGS National Gap Analysis Program. 2004. Provisional Digital Land Cover Map for the Southwestern United States. Version 1.0. RS/GIS Laboratory, College of Natural Resources, Utah State University.



## MESA COUNTY DEPARTMENT OF PUBLIC WORKS

Administration - Building - Engineering - Road and Bridge  
Traffic - **Planning** - Solid Waste Management

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750 Main Street • P.O. Box 20,000 • Grand Junction, Colorado 81502-5022  
Ph (970) 244-1636 Fax (970) 244-1769

June 26, 2013

Robert Frick, Hearings Manager, DNR\_COGCC.Rulemaking@state.co.us  
DOCKET NO. 1307-RM-0  
Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Dear Mr. Frick:

Mesa County is requesting party status for the upcoming rulemaking hearing to amend the Sensitive Wildlife Habitat Maps and Restricted Surface Occupancy Area Maps. The following is the information requested by the COGCC.

- 1) Name of Applicant: Mesa County  
Representative: Randy Price, Energy Planner
- 2) Contact Information:  
Mailing Address: PO Box 20,000, Grand Junction Colorado 81502  
Location Address: 200 S Spruce St. Grand Junction Colorado 81502  
Phone: (970)244-1759, Fax: (970)244-1769  
Email: [randy.price@mesacounty.us](mailto:randy.price@mesacounty.us)
- 3) Mesa County is requesting party status because it hosts oil and gas exploration and production activities. Mesa County is concerned with the possible economic and environmental impacts from the proposed rulemaking.

We look forward to being a party to the rule making process.

Sincerely,

Randy Price  
Mesa County, Senior Planner

Cc: County Commissioners Rose Pugliese, Steve Acquafresca and John Justman  
Tom Fisher, County Administrator  
Pete Baier, County Public Works Director  
Linda Dannenberger, County Planning Director