



Via Electronic Mail

May 22, 2008

Ms. Theresa Amoroso
Colorado Department of Public Health and Environment
Air Pollution Control Division
4300 Cherry Creek Drive South
Denver, Colorado 80222

RE: Rule Language Development for Selected Oil & Gas and VOC Stationary Source Control Strategies

Dear Ms. Amoroso,

The Independent Petroleum Association of Mountain States (IPAMS) appreciates the opportunity to comment on the Air Pollution Control Division's (Division) proposed Rule Language Development for Selected Oil & Gas and VOC Stationary Source Control Strategies.

IPAMS, founded in 1974, is a non-profit trade association representing more than 400 independent oil and natural gas producers, service and supply companies, banking and financial institutions, and industry consultants committed to environmentally responsible oil and gas development in the Intermountain West.

IPAMS has been working with the State of Colorado and other states in the Intermountain West to provide emissions data for the oil and gas industry through the WRAP Phase III Emissions Inventory project. As such, the Division will have emissions data and will continue to receive emissions data over the next few years from the oil and gas industry. Since the Division will already have emissions data via the WRAP Phase III project, IPAMS is concerned with the proposed requirement that operators obtain Air Pollution Emission Notices (APENs) and pay the associated fees for equipment that has historically been exempt from obtaining APENs.

Thank you for your consideration of the foregoing comments of the Independent Petroleum Association of Mountain States. If you have any questions on the above, or would like to speak with us further about our concerns, please do not hesitate to contact me at 303-623-0987.

Respectfully submitted,

Melissa I. Young, Esq.
Manager of Government Affairs