



COLORADO

Department of Public Health & Environment

AIR POLLUTION CONTROL DIVISION

COMPLIANCE ORDER ON CONSENT

CASE NOS. 2021-119,
2022-020,
2022-073,
2022-155
AIRS NOS. 069-0173,
069-0180

IN THE MATTER OF PROSPECT ENERGY, LLC

The Colorado Department of Public Health and Environment (“CDPHE”), through the Air Pollution Control Division (“Division”), issues this Compliance Order on Consent (“Consent Order”), pursuant to the Division’s authority under § 25-7-115(3)(b), C.R.S. of the Colorado Air Pollution and Prevention and Control Act, §§ 25-7-101 to 1309, C.R.S. (“the Act”), and its implementing regulations, 5 C.C.R. § 1001, et seq (“the Regulations”) with the express consent of Prospect Energy, LLC (“Prospect”). The Division and Prospect may be referred to collectively as “the Parties” or individually as “a Party.”

I. STATEMENT OF PURPOSE

The mutual objectives of the Parties in entering into this Consent Order are:

1. To establish compliance requirements and criteria for the continued operation of Prospect’s following oil and gas well production facilities (collectively, “Facilities”):
 - i. AIRS No. 069-0173, Krause Tank Battery, located 4.2 miles northeast of Highway 14 and US Highway 287, Larimer County, Colorado (“Krause Facility”).
 - ii. AIRS No. 069-0180, Fort Collins Tank Battery, located at NWNW Section 30, Township 8N, Range 68W, Larimer County, Colorado (“Fort Collins Facility”).



2. To resolve the violations of the Act, as determined by the Division, and cited herein, in Notice of Violations issued to Prospect by the Division on December 6, 2021 and May 3, 2022, and in Compliance Advisories issued to Prospect by the Division on March 2, 2022 and August 9, 2022.

II. DIVISION'S FINDINGS OF FACT AND DETERMINATION OF VIOLATIONS

Based upon the Division's investigation into and review of the compliance issues identified herein, and in accordance with § 25-7-115(3), C.R.S., the Division has made the following determinations regarding violations of regulatory, statutory, and/or permit requirements associated with the Facilities.

3. At all times relevant to the violations cited herein, Prospect was an LLC in good standing and registered to conduct business in the State of Colorado.

4. Prospect owns and operates the Facilities.

5. The Krause Facility is subject to the terms and conditions of Colorado Construction Permit Number 19LR0685, Issuance 1 issued to Prospect on October 28, 2019, Final Approval issued September 3, 2020 ("Permit Number 19LR0685"); and Colorado General Construction Permit Number GP05, Version 3, Final Approval issued January 24, 2020 ("GP05").

6. The following emissions points located at the Krause Facility are relevant to this enforcement action:

AIRS Point	Point Description	Permit Number
002	Four (4) 300 bbl atmospheric crude oil storage tanks, controlled by an enclosed combustor.	GP08
003	Crude oil loadout operations, controlled by an enclosed combustor.	11LR1428.XP
004	Separator gas venting, controlled by an enclosed combustor.	19LR0685
005	Two (2) 400 bbl and one (1) 300 bbl produced water storage tanks, controlled by an enclosed combustor.	GP05

7. The Fort Collins Facility is subject to the terms and conditions of Colorado Construction Permit Number 19LR0686, Issuance 1 issued to Prospect on October 28, 2019, Final Approval issued May 4, 2020 ("Permit Number 19LR0686");

Colorado General Construction Permit Number GP05, Version 3 (“GP05”); and Colorado General Construction Permit Number GP08, Version 2 (“GP08”).

8. The following emissions points located at the Fort Collins Facility are relevant to this enforcement action:

AIRS Point	Point Description	Permit Number
002	Four (4) 500 bbl crude oil storage tanks, controlled by an enclosed combustor	GP08
003	Hydrocarbon liquid loading rack	N/A
004	Separator gas venting, controlled by an enclosed combustor	19LR0686
005	Two (2) 500 bbl and one (1) 300 bbl produced water storage tanks, controlled by an enclosed combustor	GP05

9. On November 15, 2021, Craig Giesecke, of the Division, conducted an inspection, pursuant to the Division’s authority under § 25-7-111(2)(c), C.R.S., at the Krause Facility for the purpose of determining compliance with permit requirements, the Act, and the Regulations. Based on the inspection, and a review of records related to the Krause Facility, the Division issued an Immediate Notice of Violation to Prospect on December 6, 2021.

10. On January 28, 2022 and February 8, 2022, Inspector Giesecke conducted inspections, pursuant to the Division’s authority under § 25-7-111(2)(c), C.R.S., at the Krause Facility for the purpose of determining compliance with permit requirements, the Act, and the Regulations. Based on the inspection, and a review of records related to the Krause Facility, the Division issued a Compliance Advisory to Prospect on March 2, 2022.

11. On April 5, 2022, the Division and Prospect met by teleconference to discuss the issues identified in the Immediate Notice of Violation and Compliance Advisory issued for the Krause Facility.

12. On April 8, 2022, Inspector Giesecke conducted an inspection, pursuant to the Division’s authority under § 25-7-111(2)(c), C.R.S., at the Fort Collins Facility for the purpose of determining compliance with permit requirements, the Act, and the Regulations. Based on the inspection, and a review of records related to the Fort Collins Facility, the Division issued an Immediate Notice of Violation to Prospect on May 3, 2022.

13. On April 21, 2022, Sydney McLeod, of the Larimer County Department of Health and Environment, a duly delegated representative of the Division, conducted an inspection at the Fort Collins Facility for the purpose of determining compliance

with permit requirements, the Act, and the Regulations. Based on the inspection, and a review of records related to the Fort Collins Facility, the Division issued a Compliance Advisory to Prospect on August 9, 2022.

14. On August 24, 2022, the Division issued a Cease and Desist Order to Prospect ordering Prospect to temporarily discontinue any and all activities at the Krause Facility that emit or had the potential to emit air pollutants until Prospect could demonstrate to the Division the Krause Facility's full compliance with AQCC Regulations. On August 25, 2022, Prospect complied with the Cease and Desist Order and ceased operating the Krause Facility.

15. On September 14, 2022, the Division and Prospect met by teleconference to discuss the issues identified in the Immediate Notice of Violation and Compliance Advisory issued for the Fort Collins Facility as well as the conditions of the Cease and Desist Order for the Krause Facility.

16. On November 28, 2022, the Division terminated the Cease and Desist Order for the Krause Facility, following Prospect's fulfillment of the conditions of the Cease and Desist Order. On December 1, 2022, Prospect resumed full operation of the Krause Facility.

17. Based upon a review of information including the inspections, records related to the Facilities, and the information provided by Prospect, the Division has determined the following:

Krause Facility

- a. Pursuant to AQCC Regulation Number 3, Part A, § II.A.1, no person shall allow emission of air pollutants from, or construction, modification or alteration of, any facility, process, or activity which constitutes a stationary source, except residential structures, from which air pollutants are, or are to be, emitted unless and until an Air Pollutant Emission Notice ("APEN") and the associated APEN fee has been filed with the Division with respect to such emission. Prospect failed to file an APEN for the produced water tanks at the Krause Facility (now AIRS Point 005) until May 27, 2021, in violation of AQCC Regulation 3, Part A, § II.A.¹
- b. Pursuant to AQCC Regulation Number 3, Part A, § II.C.1.e, a revised APEN shall be filed with the Division before the current APEN expires. Pursuant to AQCC Regulation Number 3, Part A, §

¹ The produced water tanks were previously APEN and permit exempt. Prospect reported uncontrolled actual VOC emissions of 44.7 tons per year in the APEN submitted on May 27, 2021, based on 2020 emissions data.

II.C.3.a, a revised APEN shall be submitted no later than thirty days before the five-year term expires. Prospect submitted an APEN for AIRS Point 002 on January 4, 2016, and a revised APEN was due no later than December 5, 2020. Prospect failed to submit a revised APEN for AIRS Point 002 until May 27, 2021, in violation of AQCC Regulation Number 3, Part A, §§ II.C.1.e and II.C.3.a.

- c. Pursuant to AQCC Regulation Number 3, Part B, § II.A.1, no person shall construct, modify, or operate any stationary source or commence the conduct of any such activity without first obtaining or having a valid construction permit from the Division. Prospect failed to obtain a permit for the produced water tanks at the Krause Facility (now AIRS Point 005) until May 27, 2021, in violation of AQCC Regulation 3, Part B, § II.A.1.¹
- d. Pursuant to AQCC Regulation Number 7, Part D, § I.C.1.b, all hydrocarbon liquids and produced water collection, storage, processing and handling operations, regardless of size, must be designed, operated and maintained so as to minimize leakage of volatile organic compounds to the atmosphere to the maximum extent practicable. The following emissions were observed at the Krause Facility either as a result of completing a site investigation in response to an odor complaint or otherwise reported by the company:

Table 1: Krause Facility Observed Emission Leaks			
Location of emissions	Dates emissions observed	Emissions observed by	Repair dates
Center Produced Water Tank Thief Hatch	12/18/2019	Prospect	12/18/2019
	3/2/2021	Prospect	3/2/2021
	6/7/2021	Prospect	Unrecorded
	11/15/2021	Division	1/31/2022
	2/28/2023	Division	2/28/2023
Center Produced Water Tank Roof (holes)	3/2/2021	Prospect	3/5/2021
	6/7/2021	Prospect	Unrecorded
	9/13/2021	Prospect	1/31/2022
	11/15/2021	Division	11/24/2021

Center Produced Water Tank Vapor Line Connection Point	9/29/2022	Division	9/29/2022
East Produced Water Tank Thief Hatch	1/28/2021	Prospect	1/29/2021
	3/2/2021	Prospect	3/2/2021
	6/7/2021	Prospect	Unrecorded
	11/15/2021	Division	1/12/2022
	1/5/2023	Division	1/6/2023
	2/28/2023	Division	2/28/2023
East Produced Water Tank Roof (holes)	3/2/2021	Prospect	3/5/2021
	6/7/2021	Prospect	1/12/2022
	9/13/2021	Division	1/31/2022
West Produced Water Tank Thief Hatch	9/27/2022	Division	9/29/2022
Oil Tank #1 Thief Hatch	3/2/2021	Prospect	3/4/2021
	3/31/2021	Prospect	4/1/2021
	6/17/2022	Division	6/25/2022
	8/11/2022	Division	8/15/2022
	12/7/2022	Prospect	12/7/2022
	2/28/2023	Division	2/28/2023
Oil Tank #2 Thief Hatch	3/2/2021	Prospect	3/4/2021
	3/3/2022	Division	3/3/2022
	6/17/2022	Division	6/25/2022
	8/11/2022	Division	8/15/2022
Oil Tank #3 Thief Hatch	3/2/2021	Prospect	3/4/2021
	6/7/2021	Prospect	6/9/2021
	1/28/2022	Division	2/9/2022
	3/3/2022	Division	3/3/2022
	8/11/2022	Division	8/15/2022
Oil Tank #4 Thief Hatch	3/2/2021	Prospect	3/4/2021
	6/7/2021	Prospect	6/9/2021
	3/3/2022	Division	3/3/2022
	8/11/2022	Division	8/15/2022
	12/7/2022	Prospect	12/7/2022
	1/5/2023	Division	1/5/2023

As indicated above, Prospect failed to operate and maintain hydrocarbon liquid and produced water storage operations so as

to minimize leakage of volatile organic compounds to the atmosphere to the maximum extent practicable, violating AQCC Regulation Number 7, Part D, § I.C.1.b.

- e. Pursuant to AQCC Regulation Number 7, Part D, § XVII.C.2.a (2019) and AQCC Regulation Number 7, Part D, § II.C.2.a (2020), for storage tanks, Prospect must route all hydrocarbon emissions to air pollution control equipment, and must operate without venting hydrocarbon emissions from the thief hatch (or other access point to the tank) or pressure relief device during normal operation, unless venting is reasonably required for maintenance, gauging, or safety of personnel and equipment. The following emissions were observed at the Krause Facility either as a result of completing a site investigation in response to an odor complaint or otherwise reported by the company:

Table 2: Krause Facility Observed Emission Venting			
Location of emissions	Dates emissions observed	Emissions observed by	Repair dates
Center Produced Water Tank Thief Hatch	12/18/2019	Prospect	12/18/2019
	3/2/2021	Prospect	3/2/2021
	6/7/2021	Prospect	Unrecorded
	11/15/2021	Division	1/31/2022
	2/28/2023	Division	2/28/2023
Center Produced Water Tank Roof (holes)	3/2/2021	Prospect	3/5/2021
	6/7/2021	Prospect	Unrecorded
	9/13/2021	Prospect	1/31/2022
	11/15/2021	Division	11/24/2021
Center Produced Water Tank Vapor Line Connection Point	9/29/2022	Division	9/29/2022
East Produced Water Tank Thief Hatch	1/28/2021	Prospect	1/29/2021
	3/2/2021	Prospect	3/2/2021
	6/7/2021	Prospect	Unrecorded
	11/15/2021	Division	1/12/2022
	1/5/2023	Division	1/6/2023
	2/28/2023	Division	2/28/2023
	3/2/2021	Prospect	3/5/2021

East Produced Water Tank Roof (holes)	6/7/2021	Prospect	1/12/2022
	9/13/2021	Division	1/31/2022
West Produced Water Tank Thief Hatch	9/27/2022	Division	9/29/2022
Oil Tank #1 Thief Hatch	3/2/2021	Prospect	3/4/2021
	3/31/2021	Prospect	4/1/2021
	6/17/2022	Division	6/25/2022
	8/11/2022	Division	8/15/2022
	12/7/2022	Prospect	12/7/2022
	2/28/2023	Division	2/28/2023
Oil Tank #2 Thief Hatch	3/2/2021	Prospect	3/4/2021
	3/3/2022	Division	3/3/2022
	6/17/2022	Division	6/25/2022
	8/11/2022	Division	8/15/2022
Oil Tank #3 Thief Hatch	3/2/2021	Prospect	3/4/2021
	6/7/2021	Prospect	6/9/2021
	1/28/2022	Division	2/9/2022
	3/3/2022	Division	3/3/2022
	8/11/2022	Division	8/15/2022
Oil Tank #4 Thief Hatch	3/2/2021	Prospect	3/4/2021
	6/7/2021	Prospect	6/9/2021
	3/3/2022	Division	3/3/2022
	8/11/2022	Division	8/15/2022
	12/7/2022	Prospect	12/7/2022
	1/5/2023	Division	1/5/2023

As indicated above, Prospect failed to route all hydrocarbon emissions to air pollution control equipment and operate without venting hydrocarbon emissions from storage tank thief hatches and pressure relief devices, violating AQCC Regulation Number 7, Part D, § XVII.C.2.a (2019) and AQCC Regulation Number 7, Part D, § II.C.2.a (2020).

- f. Pursuant to AQCC Regulation Number 7, Part D, § II.E.4.d, beginning calendar year 2020, Prospect must inspect components for leaks using an approved instrument monitoring method (AIMM) in accordance with the inspection frequency in Table 3. Based on reported uncontrolled actual VOC emissions, Prospect was required to complete AIMM inspections on a quarterly basis from January 2020 through April 2021, and on a monthly basis

beginning in May 2021². Prospect failed to conduct AIMM inspections in the following periods:

Table 3: Krause Facility Missed AIMM Inspections	
Required AIMM frequency	Periods missed
Quarterly	January-March 2020
	April-June 2020
	July-September 2020
	October-December 2020
Monthly	May 2021
	July 2021
	August 2021
	October 2021

Prospect failed to complete required AIMM inspections, as shown in the table above, violating AQCC Regulation Number 7, Part D, § II.E.4.d.

- g. Pursuant to AQCC Regulation Number 2, Part A, § I.B, Prospect shall not cause or allow the emission of odorous air contaminants from any single source such as to result in odors that are detectable after the odorous air has been diluted with fifteen (15) or more volumes of odor free air (“15:1 d/t”). On January 28, 2022, Larimer County observed odors in excess of the 15:1 d/t limit, as detailed below.

Table 4: Krause Facility Odor Readings		
Time	Odor reading	Location
12:30 PM	No odor detected	Upwind
1:10 PM	No odor detected	Upwind
1:30 PM	32:1	Downwind
1:31 PM	32:1	Downwind
1:50 PM	32:1	Downwind

² The Krause Facility is located within 1,000 feet of an occupied area. Prior to May 2021, Prospect reported less than 12 tons per year of VOC emissions from the highest emitting storage tank at the Krause Facility. In May 2021, Prospect submitted an APEN for AIRS Point 005, which included estimated annual uncontrolled actual VOC emissions above 12 tons per year; making the Krause Facility then subject to monthly AIMM inspections.

2:00 PM	32:1	Downwind
2:08 PM	No odor detected	Upwind

On January 28, 2022, Prospect failed to ensure that emission of odorous air contaminants remained below the 15:1 d/t limit, violating AQCC Regulation Number 2, Part A, § I.B.

- h. Pursuant to Permit Number 19LR0685, Condition 11 and GP05, Condition II.B.2, the permit number and ten digit AIRS ID number assigned by the Division shall be marked on AIRS Points 004 and 005 for ease of identification. Until February 18, 2022, Prospect failed to mark the applicable permit numbers and AIRS IDs on AIRS Points 004 and 005, violating Permit Number 19LR0685, Condition 11 and GP05, Condition II.B.2.

Fort Collins Facility

- i. Pursuant to AQCC Regulation Number 3, Part A, § II.A.1, no person shall allow emission of air pollutants from, or construction, modification or alteration of, any facility, process, or activity which constitutes a stationary source, except residential structures, from which air pollutants are, or are to be, emitted unless and until an Air Pollutant Emission Notice (“APEN”) and the associated APEN fee has been filed with the Division with respect to such emission. Reported throughput and emissions by Prospect indicate that the produced water tanks reached two tons of VOC emissions in December 2019. Until May 27, 2021, Prospect failed to file an APEN for the produced water tanks at the Fort Collins Facility (AIRS Point 005), in violation of AQCC Regulation Number 3, Part A, § II.A.1.
- j. Pursuant to AQCC Regulation Number 3, Part A, § II.C.1.e, a revised APEN shall be filed with the Division before the current APEN expires. Pursuant to AQCC Regulation Number 3, Part A, § II.C.3.a, a revised APEN shall be submitted no later than thirty days before the five-year term expires. Prospect previously submitted an APEN for AIRS Point 002 on April 26, 2016, and a revised APEN was due no later than March 27, 2021. Prospect failed to submit a revised APEN for AIRS Point 002 until May 27, 2021, in violation of AQCC Regulation Number 3, Part A, §§ II.C.1.e and II.C.3.a.

- k. Pursuant to AQCC Regulation Number 3, Part B, § II.A.1, no person shall construct, modify, or operate any stationary source or commence the conduct of any such activity without first obtaining or having a valid construction permit from the Division. Reported throughput and emissions by Prospect indicate that the produced water tanks reached two tons of VOC emissions in December 2019. Until May 27, 2021, Prospect failed to obtain a construction permit for the produced water tanks at the Fort Collins Facility (AIRS Point 005), in violation of AQCC Regulation Number 3, Part B, § II.A.1.
- l. Pursuant to AQCC Regulation Number 7, Part D, § I.C.1.b; GP05, Condition IV.B.3; and GP08, Condition IV.B, all hydrocarbon liquids and produced water collection, storage, processing, and handling operations, regardless of size, must be designed, operated, and maintained so as to minimize emission of volatile organic compounds to the atmosphere to the maximum extent practicable.
- i. On April 8, 2022, the Division observed emissions coming from a hole in the roof of the southwest crude oil storage tank. The hole in the tank was repaired following the inspection on April 8, 2022.
 - ii. On May 9, 2022, an issue with the water level control system at the Fort Collins Facility resulted in the excessive build-up of produced water in the produced water tanks (AIRS Point 005). The produced water tanks overflowed, causing produced water to flow into the Fort Collins Facility's Tornado TEC-4-CS enclosed combustion device (ECD), resulting in a fire and visible emissions from the ECD.

Therefore, Prospect failed to operate and maintain hydrocarbon liquid and produced water storage operations so as to minimize emission of volatile organic compounds to the atmosphere to the maximum extent practicable, violating AQCC Regulation Number 7, Part D, § I.C.1.b; GP05, Condition IV.B.3; and GP08, Condition IV.B.

- m. Pursuant to AQCC Regulation Number 7, Part D, § I.C.1.d; Permit Number 19LR0686, Condition 13; GP05, Condition IV.A; and GP08, Condition IV.A.2, if a flare or other combustion device is used to control emissions of volatile organic compounds, it must be enclosed, have no visible emissions, and be designed so that an

observer can, by means of visual observation from the outside of the enclosed flare or combustion device, or by other convenient means, such as a continuous monitoring device, approved by the Division, determine whether it is operating properly. On May 9, 2022, visible emissions were observed coming from the Fort Collins Facility's Tornado TEC-4-CS enclosed combustion device. Therefore, Prospect failed to ensure that the combustion device at the Fort Collins Facility had no visible emissions, violating AQCC Regulation Number 7, Part D, § I.C.1.d; Permit Number 19LR0686, Condition 13; GP05, Condition IV.A; and GP08, Condition IV.A.2.

- n. Pursuant to AQCC Regulation Number 7, Part D, § II.C.2.a, for storage tanks, Prospect must route all hydrocarbon emissions to air pollution control equipment, and must operate without venting hydrocarbon emissions from the thief hatch (or other access point to the tank) or pressure relief device during normal operation, unless venting is reasonably required for maintenance, gauging, or safety of personnel and equipment. On April 8, 2022, the Division observed emissions coming from a hole in the roof of the southwest crude oil storage tank. Therefore, Prospect failed to route all hydrocarbon emissions to air pollution control equipment and operate without venting hydrocarbon emissions from storage tank thief hatches and pressure relief devices, violating AQCC Regulation Number 7, Part D, § II.C.2.a.

Prospect repaired the hole in the tank following the inspection on April 8, 2022.

- o. Pursuant to AQCC Regulation Number 7, Part D, § II.E.4.d, Prospect must inspect Facility components for leaks using an approved instrument monitoring method (AIMM). Pursuant to AQCC Regulation Number 7, Part D, § II.E.4.g, the estimated uncontrolled actual VOC emissions from the highest emitting storage tank at the facility determines the frequency at which inspections must be performed. The Fort Collins Facility is located within 1,000 feet of an occupied area. Based on reported VOC emissions, the crude oil tanks (AIRS Point 002) had uncontrolled VOC emissions between 2 and 12 tons per year in all rolling 12-month periods in 2020. The Fort Collins Facility was therefore subject to quarterly AIMM inspections in 2020. Thereafter, the produced water tanks (AIRS Point 005) had uncontrolled VOC emissions greater than 12 tons per year in all rolling 12-month periods from January 2021 through at least March 2022.

Therefore, the Fort Collins Facility was subject to monthly AIMM inspections in 2021 through at least March 2022. Prospect failed to complete quarterly AIMM inspections in the second, third, and fourth quarters of 2020; and failed to complete monthly AIMM inspections in January, February, April, May, July, August, October, and November of 2021, violating AQCC Regulation Number 7, Part D, § II.E.4.d.

- p. Pursuant to Permit Number 19LR0686, Condition 11 and GP05, Condition II.B.2, the permit number and ten digit AIRS ID number assigned by the Division shall be marked on AIRS Points 004 and 005 for ease of identification. At the time of the inspection on April 21, 2022, AIRS Points 004 and 005 were not marked with the applicable permit numbers or AIRS ID numbers. Prospect failed to mark AIRS Points 004 and 005 with the applicable permit numbers and AIRS IDs, violating Permit Number 19LR0686, Condition 11 and GP05, Condition II.B.2.

Prospect marked AIRS Points 004 and 005 following the inspection on April 21, 2022.

- q. Pursuant to GP05, Condition V.B.4 and V.B.4.b, Prospect must maintain records that clearly demonstrate compliance with the emission limits in the permit. Compliance with emission limits must be determined by recording the annual emissions from each emission unit on a rolling 12-month total. Prospect provided the Division with Fort Collins Facility emissions records for the inspection conducted on April 21, 2022. Upon review of the provided records, the Division found that rolling 12-month emissions were calculated inaccurately for the produced water tanks (AIRS Point 005). Prospect failed to accurately calculate emissions and provide the Division with an accurate emissions compliance record for the Fort Collins Facility, violating GP05, Condition V.B.4 and V.B.4.b.

18. The Division and Prospect entered into settlement discussions for the violations as determined by the Division. The Parties reached a settlement as detailed in this Consent Order.

III. ORDER and AGREEMENT

Based on the foregoing factual and legal determinations, pursuant to its authority under § 25-7-115, C.R.S., and as a result of the violations cited herein, the Division orders Prospect to comply with all provisions of this Consent Order, including all requirements set forth below.

19. Prospect agrees to the terms and conditions of this Consent Order. Prospect agrees that this Consent Order constitutes an order issued pursuant to § 25-7-115, C.R.S., and is an enforceable requirement of Part 1 of the Act. Prospect also agrees not to challenge directly or collaterally, in any judicial or administrative proceeding brought by the Division to enforce this Consent Order or by Prospect against the Division:

- i. the issuance of this Consent Order;
- ii. the factual and legal determinations made by the Division herein; and
- iii. the Division's authority to bring, or the court's jurisdiction to hear, any action to enforce the terms of this Consent Order under the Act.

20. Notwithstanding the above, Prospect does not admit to any of the factual or legal determinations made by the Division herein, and any action undertaken by Prospect pursuant to this Consent Order shall not constitute an admission of liability by Prospect with respect to the condition or operation of the Facilities.

Compliance Requirements

Krause Facility

21. Effective immediately, and without limitation, Prospect shall comply with the Act and the Regulations in the regulation and control of air pollutants at the Krause Facility.

22. Effective immediately, and without limitation, Prospect must comply with the provisions of AQCC Regulation 2 concerning odorous emissions including, but not limited to, the 15:1 ratio for all other land use areas at the Krause Facility.

23. Effective immediately, and without limitation, Prospect must comply with the provisions of the Krause Facility's most recent Odor Management Plan, as approved by the Division. The most recent Odor Management Plan for the Krause Facility was submitted by Prospect on January 17, 2024, and approved by the Division on January 31, 2024. Prospect may, in its discretion, submit an amended Odor

Management Plan to the Division for approval but, at all times, Prospect shall comply with the provisions of the most recently approved Odor Management Plan unless and until an amended plan is approved by the Division.

24. Prospect has commenced the preparation and implementation of processes to adhere to the Storage Tank and VCS Guidelines for the Krause Facility. Within thirty (30) days of the effective date of this Consent Order, Prospect must finalize this process by completing the following items:

- i. Prospect must include in its Written Procedures a requirement in its Predictive Analysis procedures to review the effectiveness of any thief hatch or seals used to inhibit corrosion and/or effects of hydrogen sulfide gas (H₂S) on the materials at the Krause Facility.
- ii. Cooperate with the Division to finalize and implement all procedures to comply with the VCS guidelines. Cooperation shall include, but not be limited to, responding to any Division requests for information within five (5) business days of receipt.

25. Upon the effective date of this Consent Order, and without limitation, Prospect must comply with the most recently approved Storage Tank Emission Management (STEM) plan for the Krause Facility. Within thirty (30) days of the effective date of this Consent Order, Prospect must revise and submit to the Division a STEM plan for the Krause Facility that incorporates a predictive analysis for the control of H₂S emissions. Upon Division approval, Prospect must comply with the revised STEM plan for the Krause Facility.

26. Within thirty (30) days of the effective date of this Consent Order, Prospect must install an emissions monitoring and alert system at the Krause Facility for the monitoring of H₂S. If the monitoring system detects H₂S, Prospect must take the following actions at the listed concentrations:

- i. Between **0 ppm and 70 ppb**, over a duration of at least one hour, Prospect must follow the odor response procedures as detailed in the Krause Facility's Odor Management Plan.
- ii. Between **70 ppb and 20 ppm**, over a duration of at least one hour, Prospect must complete an approved instrument monitoring method (AIMM) inspection within twelve (12) hours of initial detection to identify the source of the H₂S. Within twelve (12) hours of identification of the source of the H₂S, Prospect must eliminate or reduce the source of the H₂S to below 70 ppb. If Prospect is unable to eliminate or reduce the H₂S within twenty-four (24) hours of initial detection, Prospect must discontinue any and all activities at the

Krause Facility that emit or have potential to emit air pollutants. Prospect may not recommence operation and the emission of pollutants at the Krause Facility unless and until Prospect demonstrates to the Division that detectable H₂S is below 70 ppb. Additionally, Prospect must follow the odor response procedures as detailed in the Krause Facility's Odor Management Plan.

- iii. At **20 ppm or greater**, over a duration of at least 30 minutes, Prospect must immediately discontinue any and all activities at the Krause Facility that emit or have potential to emit air pollutants. Prospect may not recommence operation and the emission of pollutants at the Krause Facility unless and until Prospect demonstrates to the Division that detectable H₂S is below 70 ppb. Additionally, Prospect must follow the odor response procedures as detailed in the Krause Facility's current Odor Management Plan.
- iv. Prospect must maintain records of all responses required by Paragraphs 26.i-iii.

27. Prospect must conduct quarterly H₂S concentration sampling at the Krause Facility, in accordance with the following stipulations:

- i. The first sample must be taken within thirty (30) days of the effective date of this Consent Order. Thereafter, sampling must occur at least every three (3) months, on a calendar basis.
- ii. Sampling must be conducted using Draeger tubes or equivalent gas detection tubes. The detection tubes must be calibrated to a span capable of detecting H₂S within the range of detection observed during previous sampling.
- iii. Each sampling event must consist of three (3) samples taken from heater-treated gas, produced water tank headspace, and oil tank headspace.

Prospect must conduct the quarterly sampling consistent with this Paragraph until a revised Construction Permit is issued for the Krause Facility.

28. Effective immediately, and without limitation, Prospect must not allow the release of any liquid substance from knockout vessels (also known as "scrubbers") at the Krause Facility. All liquids in the knockout vessels must be routed to storage tanks, liquid flow lines, or other enclosed vessels.

29. As soon as practicable, but in any event within sixty (60) days of the effective date of this Consent Order, Prospect must install high-performance thief

hatches on all storage tanks at the Krause Facility (AIRS Points 002 and 005). Prospect must install thief hatches that are manufactured in a manner so as to be resistant to corrosive substances, including H₂S, such as thief hatches that contain a fluoroelastomer-based gasket seal and/or an anodized vacuum pallet. As of the date of this Consent Order, Oil Tanks #1 and #2 have the fluoroelastomer-based gasket seal on both the pressure relief and vacuum relief gasket seals.

30. Beginning upon the effective date of this Consent Order, Prospect must conduct infrared (IR) camera inspections at the Krause Facility at least every two (2) weeks. If Prospect observes emissions with the IR camera, Prospect must make an initial attempt to repair the source of the emissions within twenty-four (24) hours of the inspection. Within five (5) days of the IR inspection, Prospect must successfully complete final repair of the source of the observed emissions and verify repair with an approved instrument monitoring method. If Prospect is unable to successfully repair the source of the emissions within five (5) days of discovery, Prospect must discontinue any and all activities of the affected equipment that emit or has potential to emit air pollutants. Prospect may not recommence operation and the emission of the affected equipment unless and until Prospect demonstrates to the Division that the source of the emissions has been eliminated. Prospect shall follow the recordkeeping requirements of AQCC Regulation Number 7, Part B, § I.L.6 in documenting the observed emissions and efforts taken to eliminate the emissions. Prospect must conduct IR inspections consistent with this Paragraph until a revised Construction Permit is issued for the Krause Facility.

31. Within ninety (90) days of the effective date of this Consent Order, Prospect must submit an application to convert the General Construction Permits registered for the Krause Facility to a Construction Permit. This deadline may be extended via modification of this Consent Order as described in Section XI. Prospect must cooperate with the Division in submitting a complete and accurate application. Cooperation includes, but is not limited to, responding to all Division requests for information within fourteen (14) calendar days of receipt, which may be extended if agreed to by the Division in writing.

32. Within twelve (12) months of the effective date of this Consent Order, Prospect must obtain a Construction Permit for the equipment at the Krause Facility currently registered under General Construction Permits. This deadline may be extended via modification of this Consent Order as described in Section XI. Prospect must cooperate with the Division in obtaining the permit. Cooperation includes, but is not limited to, responding to all Division requests for information within fourteen (14) calendar days of receipt, which may be extended if agreed to by the Division in writing.

33. Prospect must maintain records of compliance with all requirements in Paragraphs 23 through 32 for a period of five (5) years, and make the records

available to the Division within fourteen (14) calendar days of request.

34. Beginning upon the effective date of this Consent Order and ending December 31, 2026, Prospect must submit to the Division a periodic semi-annual report (“SAR”) within sixty (60) days after the end of each half of the calendar year (January through June, and July through December) for the Krause Facility. Each SAR must contain, at a minimum, the following information:

- i. Records kept per the Krause Facility’s Odor Management Plan odor response recordkeeping requirements, including, but not limited to:
 - a. The date, time, and method of odor observations.
 - b. The investigated root cause of observed odors.
 - c. The dates and actions taken to eliminate observed odors and the dates and methods the odors were successfully eliminated.
- ii. Any deviations and revisions of the STEM plan for the Krause Facility during the reporting period. The SAR must include an explanation of the deviations of the STEM plan and actions taken, or to be taken, to prevent or resolve such deviations and an explanation of revisions made to the STEM plan.
- iii. Any instances in which the Krause Facility’s H₂S monitoring system detected H₂S within any of concentration ranges denoted in Paragraph 26, and the applicable corrective actions taken by Prospect.
- iv. Any instances in which thief hatches, thief hatch gaskets, or thief hatch components are replaced on produced water storage tanks and oil storage tanks at the Krause Facility. The information must include identification of the reasons for the replacement of the thief hatch (or gasket or other component) and a full description of the type of replacement thief hatch (or gasket or other component) installed in accordance with Paragraph 29.
- v. The dates and results of IR camera inspections completed as required in Paragraph 30, and if emissions are observed, the applicable corrective actions taken by Prospect in response.
- vi. A description of any non-compliance with the requirements of this Consent Order during the reporting period, and an explanation of the likely cause and remedial actions taken, or to be taken, to prevent or resolve such violations.

35. Prospect must submit a Notice of Completion to the Division within thirty (30) days of completion of all requirements. The Notice of Completion shall identify the date of completion of each requirement.

Fort Collins Facility

36. Effective immediately, and without limitation, Prospect shall comply with the Act and the Regulations in the regulation and control of air pollutants at the Fort Collins Facility.

37. Prospect has commenced the preparation and implementation of processes to adhere to the Storage Tank and VCS Guidelines for the Fort Collins Facility. Within thirty (30) days of the effective date of this Consent Order, Prospect must finalize this process by completing the following items:

- i. Submit notification to the Division of intent to follow the Storage Tank and VCS Guidelines for the Fort Collins Facility.
- ii. Cooperate with the Division to finalize and implement all procedures to comply with the VCS guidelines. Cooperation shall include, but is not limited to, responding to any Division requests for information within five (5) business days of receipt.

38. Upon the effective date of this Consent Order, and without limitation, Prospect must comply with the most recently approved Storage Tank Emission Management (STEM) plan for the Fort Collins Facility.

39. Prospect must maintain records of compliance with all requirements in Paragraphs 37 through 38 for a period of five (5) years, and make the records available to the Division within fourteen (14) calendar days of request.

40. Beginning upon the effective date of this Consent Order and ending December 31, 2026, Prospect must submit to the Division a periodic semi-annual report ("SAR") within sixty (60) days after the end of each half of the calendar year (January through June, and July through December) for the Fort Collins Facility. Each SAR must contain, at a minimum, the following information:

- i. Any deviations and revisions of the STEM plan for the Fort Collins Facility during the reporting period. The SAR must include an explanation of the deviations of the STEM plan and actions taken, or to be taken, to prevent or resolve such deviations and an explanation of revisions made to the STEM plan.
- ii. A description of any non-compliance with the requirements of this

Consent Order during the reporting period, and an explanation of the likely cause and remedial actions taken, or to be taken, to prevent or resolve such violations.

41. All documents submitted under this Consent Order shall use the same titles as stated in this Consent Order, and shall reference both the case number(s) and the number of the paragraph pursuant to which the document is required. Unless otherwise specifically provided herein, no document submitted for Division approval under this Consent Order may be implemented unless and until written approval is received from the Division. Any approval by the Division of a document submitted under this Consent Order is effective upon receipt by Prospect. All approved documents, including all procedures and schedules contained in the documents, are hereby incorporated into this Consent Order and shall constitute enforceable requirements under the Act.

Administrative Penalty Requirements

42. Based upon the factors set forth in § 25-7-122, C.R.S., the Division has determined an administrative penalty in the amount of **Three Hundred Thirty-Seven Thousand Fifty Dollars (\$337,050.00)** against Prospect is appropriate and consistent with the Division's policies for violations of the Act and the Regulations cited in Section II of this Consent Order. Prospect agrees to pay the sum of \$337,050.00 in administrative penalties. All penalty payments required by this Consent Order must be made by certified, corporate, or cashier's check drawn to the order of "Colorado Department of Public Health and Environment" and delivered to the attention of the Enforcement Unit Supervisor, Air Pollution Control Division, 4300 Cherry Creek Drive South, APCD-SS-B1, Denver, Colorado 80246-1530.

43. The penalty in Paragraph 42 may be paid in up to four installments:
- a. Prospect must pay thirty thousand dollars (\$30,000) within 30 days of the effective date of the Consent Order.
 - b. Prospect must pay eighty thousand dollars (\$80,000) on or before June 30, 2024.
 - c. Prospect must pay one hundred ten thousand dollars (\$110,000) on or before September 30, 2024.
 - d. Prospect must pay one hundred seventeen thousand fifty dollars (\$117,050) on or before December 31, 2024.

44. If Prospect intends to complete a sale or transfer pursuant to Section X, Prospect must pay the remaining balance of \$337,050.00 prior to the completion of the sale or transfer.

45. If Prospect seeks to terminate this Consent Order pursuant to Section XII, Prospect must pay the remaining balance of the \$337,050.00 prior to seeking

Division approval for termination.

46. The Division's willingness to accept installment payments is expressly conditioned upon Prospect's continued payments in accordance with the schedule set forth above. Failure to make payments in accordance with this installment schedule shall constitute a violation of this Order. Should Prospect fail to make any installment payment, the entire administrative penalty, at the option of the Division, shall become due and payable to the Division ten (10) days after the Division notifies the Prospect that the balance of the administrative penalty is due.

IV. SCOPE AND EFFECT OF CONSENT ORDER

47. The Parties agree and acknowledge that this Consent Order constitutes a full and final settlement of the violations cited herein. This Consent Order is a final agency action. Prospect agrees not to challenge the terms and conditions of this Consent Order in any proceeding before any administrative body or any judicial forum, whether by way of direct judicial review or collateral challenge.

48. This Consent Order shall be enforceable by either Party in the same manner as if the Division had entered this Consent Order without agreement by Prospect. The Parties agree that any violation of the provisions of this Consent Order by Prospect concerning the Act, or the Regulations, shall be a violation of a final order of the Division for the purposes of §§ 25-7-115, 121, and 122, C.R.S., and may result in the assessment of civil penalties consistent with § 25-7-115, C.R.S., per day for each day of such violation.

49. The Parties' obligations under this Consent Order are limited to the matters expressly stated herein or in approved submissions required hereunder. All submissions made pursuant to this Consent Order are incorporated into this Consent Order and become enforceable under the terms of this Consent Order as of the date of approval by the Division.

50. The Division's approval of any submission, standard, or action under this Consent Order shall not constitute a defense to, or an excuse for, any prior violation of any requirement under the Act, the Regulations, or any subsequent violation of any requirement of this Consent Order, the Act, or the Regulations.

51. Entering into this Consent Order shall not constitute an admission of violation of any air quality laws by Prospect, nor shall the Division or any third party infer it to be such an admission by Prospect in any administrative or judicial proceeding. Notwithstanding the foregoing or anything in this Consent Order to the contrary, the violations included in this Consent Order will constitute part of Prospect's compliance history for any purpose for which such history is relevant,

including considering the violations described above in assessing a penalty for any subsequent violations, in accordance with the provisions of § 25-7-122, C.R.S., against Prospect.

52. Prospect shall comply with all applicable Federal, State, and/or local laws and regulations and shall obtain all necessary approvals or permits to conduct the investigation and remedial activities required by this Consent Order and perform its obligations required hereunder. The Division makes no representation with respect to approval and permits required by Federal, State, or local laws or regulations other than those specifically referred to herein.

53. Nothing herein shall be construed as prohibiting, altering, or in any way limiting the ability of the Division to seek any other remedies or sanctions available by virtue of Prospect's violation of this Consent Order or of the statutes and regulations upon which this Consent Order is based, or for Prospect's violation of any applicable provision of law.

V. LIMITATION RELEASES AND RESERVATION OF RIGHTS AND LIABILITY

54. Upon the effective date of this Consent Order, this Consent Order shall stand in lieu of any other enforcement action by the Division with respect to the violations cited herein. This Consent Order does not grant any release of liability for any violations, regardless of when they occurred, that are not cited in this Consent Order. The Division reserves the right to bring any action it deems necessary to enforce this Consent Order, including actions for penalties and/or injunctive relief.

55. Nothing in this Consent Order shall preclude the Division from imposing additional requirements necessary to protect human health or the environment and to effectuate the purposes of this Consent Order. Nor shall anything in this Consent Order preclude the Division from imposing additional requirements in the event additional information is discovered that indicates such requirements are necessary to protect human health or the environment.

56. Prospect reserves its rights and defenses regarding liability in any proceedings regarding the Facilities other than proceedings to enforce this Consent Order.

57. Upon the effective date of this Consent Order, Prospect releases and covenants not to sue the State of Colorado as to all common law or statutory claims or counterclaims arising from, or relating to, the violations of the Act or the Regulations specifically addressed herein.

58. Prospect shall not seek to hold the State of Colorado or its employees, agents, or representatives liable for any injuries or damages to persons or property

resulting from acts or omissions of Prospect, or those acting for or on behalf of Prospect, including its officers, employees, agents, successors, representatives, contractors or consultants in carrying out activities pursuant to this Consent Order. Prospect shall not hold out the State of Colorado or its employees, agents or representatives as a party to any contract entered into by Prospect in carrying out activities pursuant to this Consent Order. Nothing in this Consent Order shall constitute an express or implied waiver of immunity otherwise applicable to the State of Colorado, its employees, agents, or representatives.

59. The Division reserves the right to bring any action or to seek civil or administrative penalties for any past, present, or future violations of the Act and the Regulations, not specifically addressed herein. Further, the Division has the right to bring any action to enforce this Consent Order and to seek authorized penalties for any violation of this Consent Order.

VI. FORCE MAJEURE

60. Prospect shall perform the requirements of this Consent Order within the schedules and time limits set forth herein and in any approved plan unless the performance is prevented or delayed by events that constitute a force majeure. A force majeure is defined as any event arising from causes which are not reasonably foreseeable, which are beyond the control of Prospect, and which cannot be overcome by due diligence.

61. Unless otherwise provided in the Act or the Regulations, within seventy-two (72) hours of the time that Prospect knows or has reason to know of the occurrence of any event which Prospect has reason to believe may prevent Prospect from timely compliance with any requirement under this Consent Order, Prospect shall provide verbal notification to the Division. Within four (4) calendar days of the time that Prospect provides such verbal notification, Prospect shall submit to the Division a written description of the event causing the delay, the reasons for and the expected duration of the delay, and actions which will be taken to mitigate the duration of the delay.

62. The burden of proving that any delay was caused by a force majeure shall at all times rest with Prospect. If the Division agrees that a force majeure has occurred, the Division will so notify Prospect. The Division will also approve or disapprove of Prospect's proposed actions for mitigating the delay. If the Division does not agree that a force majeure has occurred, or if the Division disapproves of Prospect's proposed actions for mitigating the delay, it promptly shall provide a written explanation of its determination to Prospect.

63. Delay in the achievement of one requirement shall not necessarily justify or excuse delay in the achievement of subsequent requirements. In the event

any performance under this Consent Order is found to have been delayed by an event of force majeure, Prospect shall perform the requirements of this Consent Order that were not delayed by the force majeure with all due diligence.

VII. DISPUTE RESOLUTION

64. If the Division determines that additional requirements are necessary, that a violation of this Consent Order has occurred, that a force majeure has not occurred, or that the actions taken by Prospect to mitigate the delay caused by a force majeure are inadequate, the Division shall provide a written explanation of its determination to Prospect. Within fifteen (15) calendar days of receipt of the Division's determination, Prospect shall:

- a. Submit a notice of acceptance of the determination; or
- b. Submit a notice of dispute of the determination.

If Prospect fails to submit either of the above notices within the specified time, it will be deemed to have accepted the Division's determination.

65. If Prospect files any notice of dispute, the notice shall specify the particular matters in the Division's determination that Prospect seeks to dispute and the basis for the dispute. Matters not identified in the notice of dispute shall be deemed accepted by Prospect. The Division and Prospect shall have thirty (30) calendar days from the receipt by the Division of the notification of dispute to reach an agreement. If agreement cannot be reached on all issues within this thirty (30) day period, the Division shall confirm or modify its decision within an additional fourteen (14) days, and the confirmed or modified decision shall be deemed effective and subject to appeal in accordance with the Act and the Colorado Administrative Procedure Act, Article 4, Title 24, Colorado Revised Statutes.

VIII. NOTICES

66. Unless otherwise specified, any report, notice or other communication required under the Consent Order shall be sent to:

For the Division: Enforcement Unit Supervisor
Colorado Department of Public Health and Environment
APCD-SS-B1-1400
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

For Prospect: Ward Giltner
Prospect Energy, LLC

1036 Country Club Estates Drive
Castle Rock, Colorado 80108

with a copy to: Jack R. Luellen
Buchalter
1624 Market Street, Suite 400
Denver, Colorado 80202-2457
jluellen@buchlater.com

IX. OBLIGATIONS UNAFFECTED BY BANKRUPTCY

67. The obligations set forth herein are based on the Division's police and regulatory authority. These obligations require specific performance by Prospect of corrective actions intended to prevent on-going or future harm to public health or the environment, or both. Enforcement of these obligations is not stayed by a petition in bankruptcy. Prospect agrees that the penalties set forth in this Consent Order are not in compensation of actual pecuniary loss. Further, the obligations imposed by this Consent Order are necessary for Prospect and the Facility to achieve and maintain compliance with State law.

X. SALES AND TRANSFERS OF OPERATIONAL OR OWNERSHIP INTEREST

68. This Consent Order shall not be construed to impede the transfer of an operational interest in, or the operation of, any facility to a third party unaffiliated with Prospect so long as the requirements of this Consent Order are met. This Consent Order shall not be construed to prohibit a contractual allocation as to operational responsibilities only—as between Prospect and a third party—of the burdens of compliance with this Consent Order provided that Prospect and such third party shall remain jointly and severally liable for the obligations of this Consent Order applicable to the transferred or purchased facilities. Prospect shall advise the third party in writing of the existence of this Consent Order prior to such sale or transfer and shall send a copy of such written notification to the Division at least 30 calendar days before the closing date of such proposed sale or transfer.

69. If the Division consents, such consent not to be unreasonably delayed or withheld, and Prospect and the third party buyer comply with all other requirements of this Consent Order, the Division, Prospect and a third party may execute a modification that relieves Prospect of its liability under this Consent Order for, and makes the third party liable for, all obligations and liabilities applicable to the purchased or transferred facility and associated well production assets. Notwithstanding anything herein to the contrary, Prospect may not assign, and may not be released from, any obligation under this Consent Order that is not specific to the purchased or transferred facility.

XI. MODIFICATIONS

70. This Consent Order may be modified only upon the written agreement of the Parties.

XII. TERMINATION

71. Termination by Plugging and Abandonment: Prospect may seek to terminate this Consent Order upon permanent plugging and abandonment of the wells associated with the facilities. To seek termination, Prospect must submit documentation to the Division demonstrating that all wells associated with the facilities have been permanently plugged and abandoned. If the Division determines that termination is appropriate, the Division will issue a notice of termination.

XIII. BINDING EFFECT, AUTHORIZATION TO SIGN, AND EFFECTIVE DATE

72. This Consent Order is binding upon the Parties to this Consent Order and their corporate subsidiaries or parents, their respective officers, directors, agents, attorneys, employees, contractors, successors in interest, affiliates, and assigns. The undersigned warrant that they are authorized to bind legally their respective principals to this Consent Order, and that the Parties have the authority to enter into this Consent Order. This Consent Order shall be effective upon the date signed by the last Party. In the event that a Party does not sign this Consent Order within thirty (30) calendar days of the other Party's signature, this Consent Order becomes null and void. This Consent Order may be executed in multiple counterparts, each of which shall be deemed an original, but all of which shall constitute one and the same Consent Order. The Parties agree that this Consent Order may be electronically signed. The Parties agree that the electronic signatures appearing on this Consent Order are the same as handwritten signatures for the purposes of validity, enforceability, and admissibility.

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

By:  _____ Date: 2/15/2024
Shannon McMillan
Compliance and Enforcement Program Manager
Air Pollution Control Division

PROSPECT ENERGY, LLC

By: DocuSigned by:
Ward Giltner
ZDD0B24004A74CA _____ Date: 2/15/2024
Ward Giltner **Manager**

cc: Shannon McMillan, APCD
Jennie Morse, APCD
Craig Giesecke, APCD
Heather Wuollet, APCD
Zack Stazick, APCD
Michael Stovern, EPA (Region VIII)
David Beckstrom, Attorney General's Office
Sydney McLeod, Larimer County Department of Health and Environment
File

Rebecca Wilson, APCD
Jen Mattox, APCD
Joseph Wright, APCD
Jason Long, APCD
Will Marshall, Attorney General's Office