



Sensible EDPTM
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Colorado Reg 7 Updates: What Upstream Operators Need to Know

RMEHSPG Q2 2025 Meeting

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Welcome!



Austin Heitmann

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Real-Time Air Monitoring*



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Agenda

Regulation 7 Review of :

- Continuous Monitoring Requirements
 - Monitoring plan updates
 - Calibration Protocols
 - Automated Summa Canister Sampling
 - Data Collection and Reporting
 - Implications for Operators
- Disproportionately Impacted Community
- Pneumatic Controllers and Pumps



CDPHE Regulation 7 – Continuous Air Monitoring

Updated rule adopted February 2025: Background

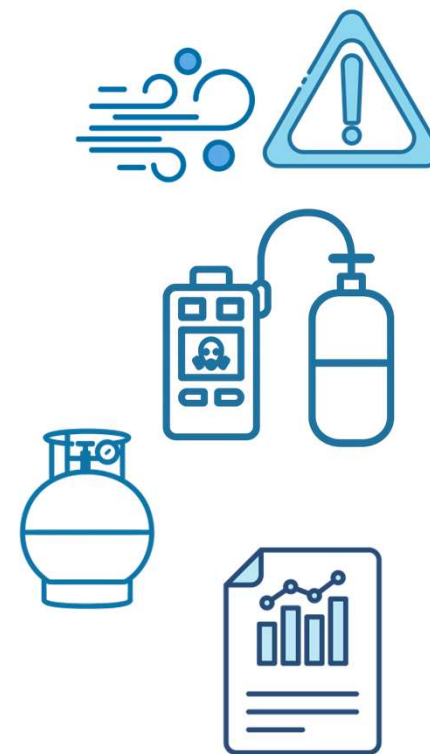
- Fenceline monitoring: the placement of monitors along the perimeter of a facility to measure pollutant concentrations
- Original rule went into effect May 2021. Any new multi-well facility must:
 - Begin monitoring 10 days prior to any pre-production activity
 - Updates went into effect April 14, 2025
- Monitoring Plan – 60 days prior to drilling
- Continuous analyzers with ability for analyzer data to trigger alerts and sample collection
- Action levels, that include notification to CDPHE
- Monthly reporting



CDPHE Regulation 7 – Continuous Air Monitoring

Key Changes

- Standardized Monitoring Plans and Action Thresholds
- Enhanced calibration & bump test requirements
- Automated whole air sampling
- Updated data reporting requirements



CDPHE Regulation 7 – Continuous Air Monitoring

Monitoring Plans

- Division-approved template
- Must meet updated requirements for any plans submitted after May 1, 2025
- Current prescriptive guidance document in draft
- Include GIS shapefile outlining preliminary boundaries of facility



CDPHE Regulation 7 – Continuous Air Monitoring

Calibration Protocols

- Calibration within 14 days of install or re-installation
- Factory/lab-calibrated units: 60 days from install + bump test
- Monthly two-point bump tests for VOC/CH₄ monitors
 - with at least 10 days between tests
 - Failed bump: Re-bump, calibrate, or replace within 30 days



CDPHE Regulation 7 – Continuous Air Monitoring

Automated Summa Canister Sampling

- Required for sites within 2,000 ft of residential/high occupancy building unit or school/childcare facility
- Triggers: Monitor values exceeding response thresholds
- Samples analyzed for a minimum of BTEX compounds (Benzene, Toluene, Ethylbenzene, Xylenes)

CDPHE Regulation 7 – Continuous Air Monitoring

Data Collection and Reporting

- 75% uptime requirement and replace sensors within 30 days
- One-minute interval data reporting
- Updated GIS Shapefile
- Monthly reports with Division-approved format
 - Include: Well API schedule, data flags, and exceedance documentation



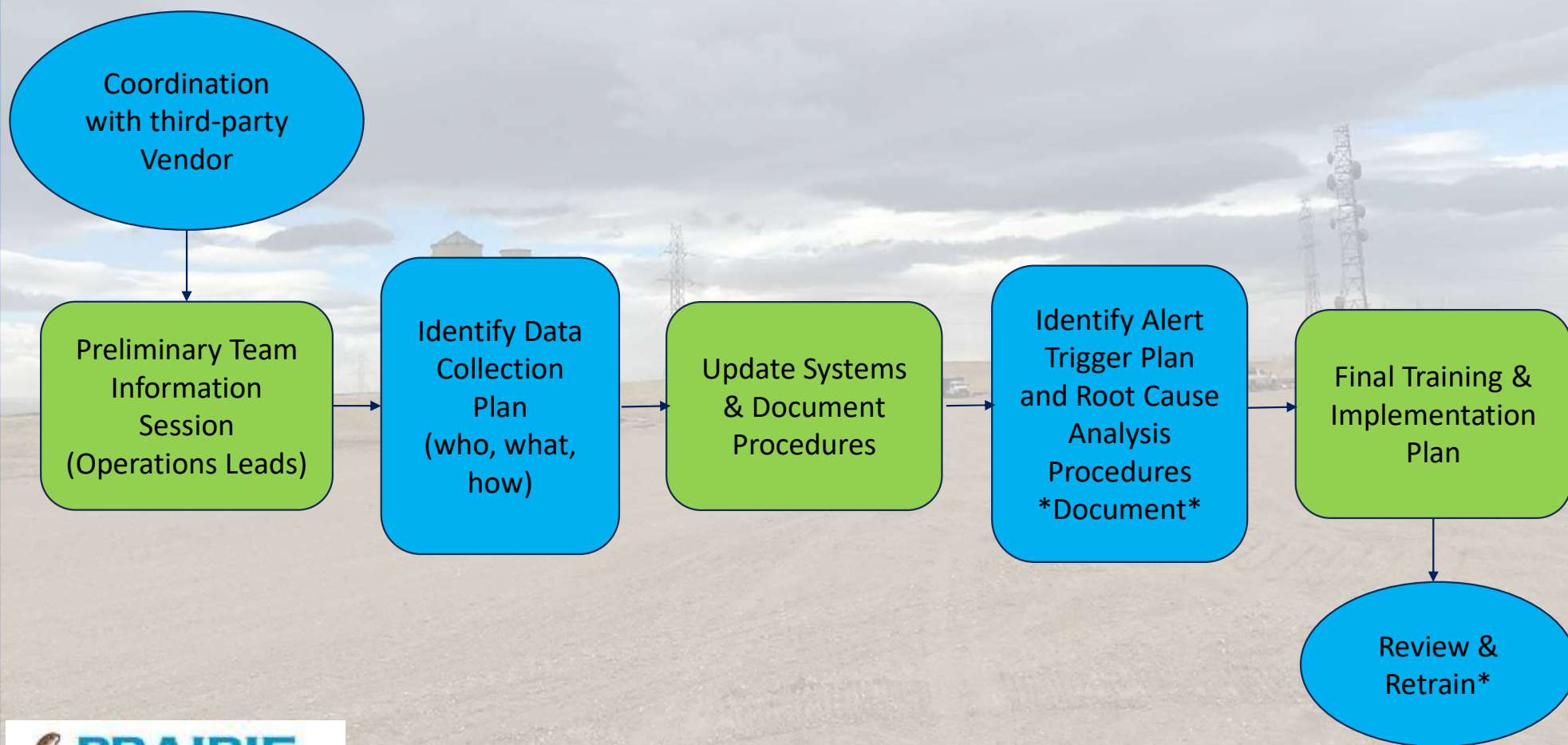
CDPHE Regulation 7 – Continuous Air Monitoring

Implications for Operators

People	<ul style="list-style-type: none">• Can respond to meet uptime requirements• Established QA for whole air sampling• Can respond to action threshold exceedance• Properly trained on updated requirements
Equipment	<ul style="list-style-type: none">• Capable of reliably collecting whole air sampling with ongoing QA• Ability to backup data while connectivity is down• Reliable enough to mitigate false alerts and downtime• Can monitor for additional components
Data Management	<ul style="list-style-type: none">• Can generate monitoring plans and monthly reports (including data flagging)• Can store and visualize whole air sample data• Can ingest GIS Shapefiles



Air Monitoring Implementation Planning

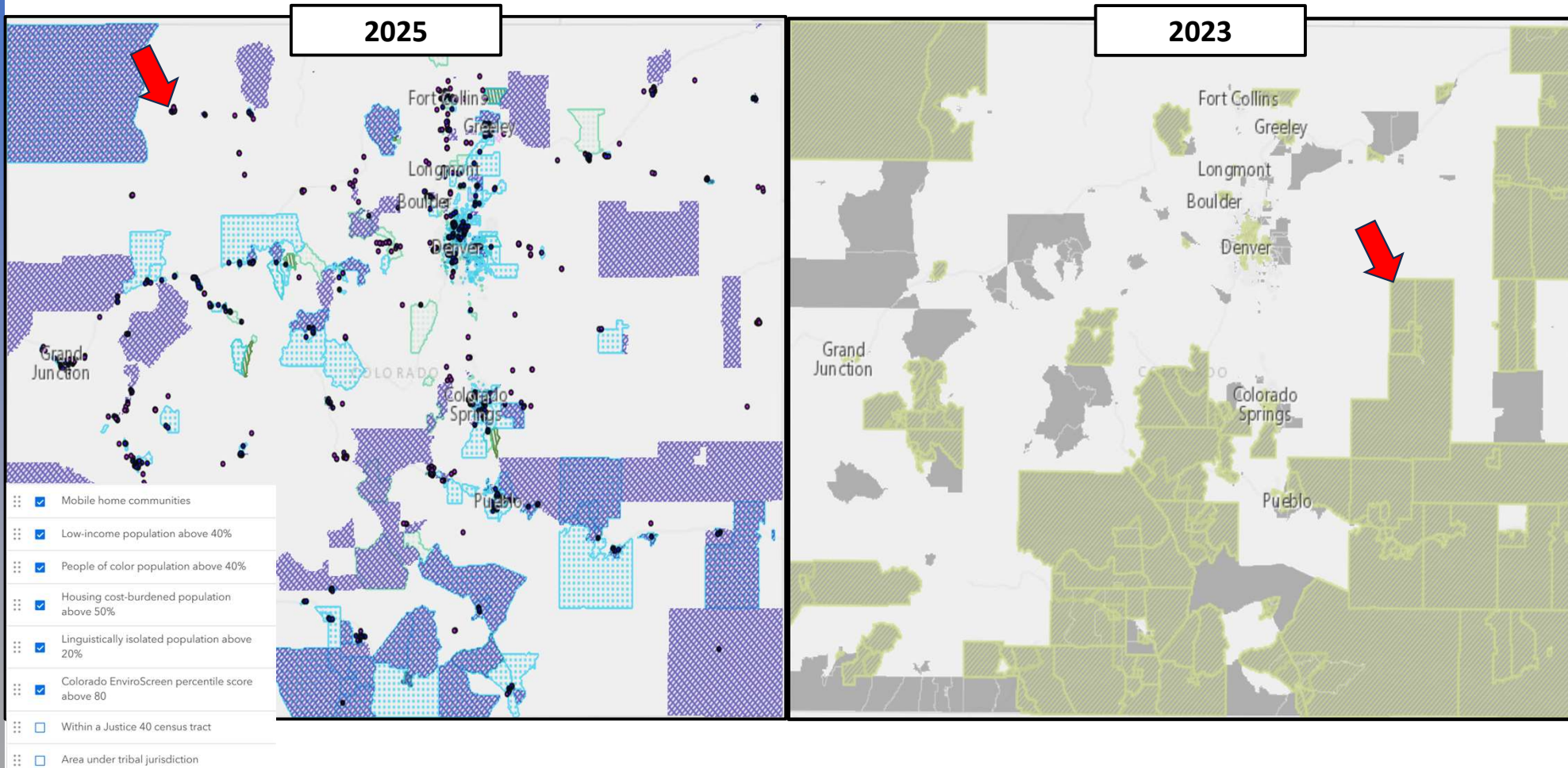


Other Reg 7 Updates

Adopted 02/21/25, effective 04/14/25



CDPHE Regulation 7 – Disproportionately Impacted Community (DIC)



<https://www.cohealthmaps.dphe.state.co.us/DICommunity/>

CDPHE Regulation 7 – Disproportionately Impacted Community (DIC)

Updates

- DIC Definition (II.A.11)
- Enclosed Combustion Device Initial and Subsequent Performance Test Schedule (I.B.2.h.(ii), II.B.2.h.(iv))
 - ECD Test Recordkeeping (II.B.2.i.(xi))
 - ECD Test Reporting (II.B.2.j.(v))
- LDAR (II.E.3.d.(i), II.E.4.e.(i)(A), II.E.4.e.(ii)(A))
- Downhole Maintenance, Well Unloads, Well Plugging (II.G.1.d.(ii)(D)), II.G.1.d.(ii)(E))
- Pigging and Blowdowns for Midstream Facilities (II.H.1.c.(x), II.H.1.c.(xi))
- Pigging at Stand Alone Facilities (II.H.2.a.(iv), II.H.2.a.(v), I.H.2.b.(iv), I.H.2.b.(v), II.H.2.c.(iv), II.H.2.c.(v))
- ONGAEIR (V.B.1.c.(i))
- Pre-production Operations (VI.E.1.c.)
- GHG Intensity (VIII.C.1.c.)



CDPHE Regulation 7 – Pneumatic Controllers and Pumps (EPA EG 0000c)

Purpose:

- To align more closely with the presumptive standards in EPA’s EG 0000c.

Goal:

- To comply with a zero methane emissions to atmosphere standard for all Pneumatic Controllers and Pumps (exceptions: Emergency Shutdown Devices (ESD) as defined in III.B.7).

Upcoming Compliance Dates:

- December 1, 2025: Submit initial report
- May 1, 2026: All gas-driven pneumatics that function ESD must be tagged.

	Inside the 8-hour Ozone Control Area or Northern Weld County	
	Compliance Deadlines	% of an owner/operator's applicable facilities
Inside the 8-hour Ozone Control Area or Northern Weld County	1-May-26	50%
	1-May-27	100%
Outside the 8-hour Ozone Control Area or Northern Weld County	1-May-26	25%
	1-May-27	50%
	1-May-28	75%
	1-May-29	100%



CDPHE Regulation 7 – Pneumatic Controllers and Pumps (EPA EG 0000c)

What Facilities?

- The sum of all of the owner or operator’s facilities that had natural gas-driven pneumatic controllers as of May 1, 2023.
- Located at well production facilities and natural gas compressor stations upstream of natural gas processing plants and at natural gas processing plants.

How:

- Retrofitting NG Controllers to route to a process (III.C.5.b.(i)(A)) or be self-contained (III.C.5.b.(i)(B)) (requires a design analysis by a certified engineer)
- Replacing NG Controllers with Non-NG pneumatic controllers (III.C.5.b.(i)(C))
- Replacing NG Controllers with non-pneumatic controllers (III.C.5.b.(i)(C))
- Shutting down facilities (III.C.5.b.(i)(D))



Thank you | Questions



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Additional Resources

*Scan for additional resources around Colorado
Regulation 7*

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