

BEFORE THE OIL AND GAS CONSERVATION COMMISSION
STATE OF COLORADO

IN THE MATTER OF CHANGES TO THE) CAUSE NO. 1R
RULES AND REGULATIONS OF THE OIL)
AND GAS CONSERVATION COMMISSION) DOCKET NO. 0803-RM-02
OF THE STATE OF COLORADO)

**COLORADO PETROLEUM ASSOCIATION'S
RESPONSE TO COMMISSION'S REQUEST REGARDING ORDER OF
PRESENTATION FOR RULEMAKING HEARING**

Pursuant to the Commission's request at its procedural hearing on May 22, 2008, the Colorado Petroleum Association ("CPA"), by and through its counsel, hereby respectfully submits this recommendation regarding a preferred order for the rulemaking hearing:

1. The CPA recommends that the Commission set aside sufficient time to first consider the economic impacts of the Draft Rules, including testimony from expert witnesses regarding costs and financial implications for the oil and gas industry, as well as other businesses, Colorado property owners, local communities and the State. To this end, the CPA will submit as part of its Rebuttal Statement an economic impact study commissioned by CPA members which will examine the financial implications of certain of the Draft Rules. The CPA intends to present as witnesses the authors of this study.

2. Following full consideration of the economic impacts of the Draft Rules, the CPA recommends that the Commission next address the following issues and rules in order:

Protection of Wildlife Resources – 1200-series

Surface Water Drinking water Supply Areas – 317B

Visual Impact Mitigation, Odors and Dust – 804, 805

Recordkeeping – 205, 206, 210

3. Once these initial priority issues have been heard and considered, the CPA recommends that the Commission utilize the remainder of the hearing time to proceed through the Draft Rules in numerical order.

4. The CPA remains concerned that the schedule adopted by the Commission will not allow Parties the requisite time to fully present, and for the Commission to fully examine, the Draft Rules and their attendant issues and impacts. CPA members believe their witnesses and exhibits easily would require several days of hearing in order to allow

the Commission to be able to fully and responsibly hear and understand the pertinent evidence.

Respectfully Submitted this 27th day of May, 2008.

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- and -

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**Attorneys for Colorado Petroleum
Association**

CERTIFICATE OF SERVICE

I, hereby certify that on this 27th day of May, 2008, I mailed via U.S. Mail, postage pre-paid, one original of the above and foregoing COLORADO PETREOLEUM ASSOCIATION'S REQUEST TO COMMISSION'S REQUEST REGARDING ORDER OF PRESENTATION FOR RULEMAKING HEARING, addressed to the following:

Patricia Beaver, Hearing Manager tricia.beaver@state.co.us
Docket No. 0803-RM-02
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

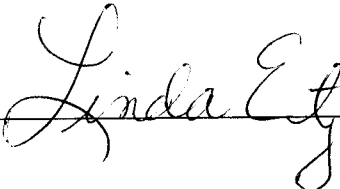
With electronic copies sent to:
Marc.fine@state.co.us and all of the Parties
listed on the Party List found at the OGCC
website.



A handwritten signature in cursive script, reading "Linda Ely", is written over a horizontal line.

I also hereby certify that on this 27th day of May, 2008, I mailed via U.S. Mail, postage pre-paid, two (2) true and correct copies of the above and foregoing COLORADO PETREOLEUM ASSOCIATION'S RESPONSE TO COMMISSION'S REQUEST REGARDING ORDER OF PRESENTATION FOR RULEMAKING HEARING, addressed to the following:

Kelly Rees kelly.rees@state.co.us
Colorado Department of Law
1525 Sherman Street, 5th Floor
Denver, CO 80203



A handwritten signature in cursive script, reading "Linda Ely", is written over a horizontal line.

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