Colorado Regulation 7 Oil & Gas Audit

Program Audit Checklist

Facility Name:	
Auditor:	
Date:	
Audit Period:	

Regulatory References

The following regulations and guidance documents are applicable to this program audit. Click any link to view the full text.

Regulation / Guidance Document
Colorado Regulation 7 — Full Text (CDPHE)
CDPHE Oil and Gas GHG Intensity Program
CDPHE Oil and Gas Regulation Overview
CDPHE Reducing Methane Emissions from Oil and Gas Operations
Colorado GHG Pollution Reduction Roadmap
AQCC Meeting Materials and Rulemaking Records
CDPHE Oil and Gas Compliance and Recordkeeping Resources

Instructions: Review each audit item and record findings in the Status and Notes columns. Use C (Compliant), NC (Non-Compliant), NA (Not Applicable), or NR (Needs Review) for the status. Document specific findings, evidence reviewed, and any corrective actions needed in the Notes column.

Leak Detection and Repair (LDAR)

Audit Item	Expected Finding	Status	Notes / Evidence
LDAR program and inspection frequency	LDAR program covers all applicable components at well production facilities, compressor stations, and processing plants. Inspections are conducted using OGI (IR camera) or Method 21 at frequencies meeting or exceeding Reg 7 requirements: monthly for facilities with emissions ≥12 tpy VOC in the nonattainment area, quarterly for most other facilities, and at minimum frequencies for lower-emission facilities. AVO (audio, visual, olfactory) inspections supplement instrument-based surveys. *» Ref: Reg 7, Part D, Section II.E*		
Leak repair timeliness	Identified leaks are repaired within 15 days of discovery per Reg 7 Part D, Section II.E. First attempt at repair is made within 5 days. If repair cannot be completed within 15 days, a delay of repair is documented with justification, estimated repair date, and interim emission reduction measures. Delay of repair records are maintained. *» Ref: Reg 7, Part D, Section II.E (15-day/5-day repair)*		

Audit Item	Expected Finding	Status	Notes / Evidence
LDAR recordkeeping	Records maintained for each LDAR inspection include: date, time, inspector identity, instrument used and calibration status, components surveyed, leaks identified (location, component type, estimated emission rate), repair dates, and verification that repair was effective. Records are retained for a minimum of five years and are available for CDPHE inspection. » *Ref: Reg 7, Part D, Section II.E (5-year retention)*		
Alternative monitoring technologies	If using alternative monitoring technologies (continuous monitoring systems, aerial surveys, drone-mounted OGI), the operator has obtained CDPHE approval through an alternative monitoring plan per Reg 7 requirements. Approval documentation is on file. Technology meets performance criteria specified in the approval. » *Ref: Reg 7, Part D, Section II.E.4.f (APMPLS); CDPHE alternative plans*		

Storage Tank Emissions Management

Audit Item	Expected Finding	Status	Notes / Evidence
STEM plan	Storage Tank Emissions Management (STEM) plan per Reg 7 Part D, Section II.C exists for each applicable tank battery. STEM plan identifies all storage vessels, estimated uncontrolled emissions, control equipment, and compliance pathway (control device, vapor recovery, or tank design). STEM plan is current and reflects actual operations. » *Ref: Reg 7, Part D, Section II.C*		
Storage tank control requirements	Storage tanks with uncontrolled VOC emissions ≥2 tpy (statewide threshold) route emissions to a control device achieving ≥95% destruction/removal efficiency or to a vapor recovery unit. Tanks in the nonattainment area meeting lower thresholds also comply. Thief hatches and other openings are properly sealed. » *Ref: Reg 7, Part D, Section II.C (≥2 tpy VOC statewide)*		
Auto-gauging and loadout controls	Where required, auto-gauging systems are installed to minimize manual tank gauging emissions. Loadout operations use vapor-tight connections and route displaced vapors to a control device or VRU. Truck loading operations comply with Reg 7 loading loss requirements. » *Ref: Reg 7, Part D, Section II.C-D*		
Tank inspection and maintenance	Storage tanks, seals, hatches, pressure/vacuum relief devices, and closed vent systems are inspected at required frequencies. Deficiencies are documented and repaired promptly. Annual or more frequent inspections of control device connections and tank integrity are conducted. » *Ref: Reg 7, Part D, Section II.C (ongoing integrity)*		

Pneumatic Controllers and Compressors

Audit Item	Expected Finding	Status	Notes / Evidence
Pneumatic controller requirements	All pneumatic controllers at upstream facilities comply with Reg 7 requirements: controllers placed in service after February 1, 2009 are low-bleed (≤6 scfh); at processing plants, controllers installed after January 1, 2018 are zero-bleed. Per the February 2025 AQCC rule, all natural gas-driven pneumatic controllers are being phased out statewide on an accelerated timeline (more stringent than the federal March 2029 deadline). Phase-out schedule compliance is tracked. » *Ref: Reg 7, Part D, Section II.C; Feb 2025 AQCC amendments*		
Pneumatic controller inventory and reporting	Complete inventory of all pneumatic controllers is maintained with: location, type (continuous bleed high/low, intermittent, zero-emission), manufacturer, bleed rate, and date installed. Pneumatic controller reporting forms are submitted to CDPHE as required. Changes to inventory are updated promptly. » *Ref: Reg 7, Part B, Section III.C.4*		
Compressor emission controls	Wet seal centrifugal compressors reduce emissions by ≥95% (Reg 7 Part D, Section II.B). Reciprocating compressor rod packing is replaced every 26,000 operating hours or 36 months, whichever comes first. Compressor station fugitive emissions are addressed through the LDAR program. » *Ref: Reg 7, Part D, Section II.B*		
Engine and turbine emissions	Stationary engines and turbines at oil and gas facilities meet Reg 7 emission limits for NOx, CO, and VOC. Engines are tested or monitored at required intervals. Engine emission records including manufacturer data, operating hours, and test results are maintained. » *Ref: Reg 7, Part D, Sections II.A-B (combustion equipment)*		

GHG Intensity and Emissions Reporting

Audit Item	Expected Finding	Status	Notes / Evidence
GHG intensity verification program	If operating in the upstream segment, facility participates in the GHG intensity verification program per Reg 7 Part B, Section VIII. Measurement-informed methane emissions inventory is prepared. GHG intensity is calculated per 1,000 barrels of oil equivalent (BOE). Intensity meets the declining annual limit (starting at 11 tons CO_2e/1,000 BOE in 2025 for large operators, decreasing through 2030). » *Ref: Reg 7, Part B, Section VIII.F-G*		
Annual emissions inventory report (ONGAEIR)	Oil and Natural Gas Annual Emissions Inventory Report is submitted to CDPHE by June 30 annually for the prior calendar year. Report includes emissions of VOC, NOx, CO, methane, and other pollutants from all sources. Report uses required methodology and emission factors. State default intensity verification factor (1.164 for		

Audit Item	Expected Finding	Status	Notes / Evidence
	2025) is applied unless an operator-specific program is approved. » *Ref: Reg 7, Part D, Section V (due June 30)*		
Midstream GHG reduction planning	If operating midstream facilities (compressor stations, processing plants), GHG reduction plan is developed per the December 2024 midstream rule (Reg 7 Part B, Section VII). Plan addresses emissions from fuel combustion equipment (engines, turbines, heaters). Steps to reduce emissions commenced by February 14, 2025. Company is on track for the 2030 sector-wide emissions limit. » *Ref: Reg 7, Part B, Section VII (Dec 2024 rule)*		
Emission control device (ECD) monitoring	Emission control devices (flares, enclosed combustors, VRUs) are monitored per Reg 7 ECD requirements. Continuous pilot monitoring or equivalent is in place. ECD performance tests are conducted as required. Uptime records demonstrate the ECD is operating at required levels. Any deviations are documented and reported. » *Ref: Reg 7, Part D, Section II.B.2.h*		

Air Monitoring, Permits, and Recordkeeping

Audit Item	Expected Finding	Status	Notes / Evidence
Pre-production and facility air monitoring	Where required by Reg 7 Part D, Section III (effective July 2024 with 2025 revisions), air quality monitoring is conducted at or near well production facilities during pre-production and early production. Monitoring plan is approved by CDPHE. Monitoring data is submitted on monthly reporting forms. Data quality meets CDPHE guidance. » *Ref: Reg 7, Part D, Section III (eff. July 2024)*		
APEN and permit compliance	Air Pollutant Emission Notices (APENs) are current for all applicable sources. Permit conditions are documented and tracked. Any changes to emissions that trigger permit modifications or new APENs are addressed within required timeframes. Permit conditions align with actual operations. » *Ref: Reg 3, Section II (APEN); Reg 7, Part D*		
Disproportionately impacted community (DIC) requirements	Facilities located near disproportionately impacted communities (as mapped by CDPHE's November 2024 DIC map) comply with any additional requirements including enhanced monitoring, notification, or emission controls. DIC status of facility locations is assessed using the current CDPHE map. » *Ref: SB 21-272; CDPHE DIC Map (Nov 2024); Reg 7 (Apr 2025 revisions)*		
Record retention and availability	All Reg 7 compliance records are retained for a minimum of five years including: LDAR inspection records, STEM plans, emissions calculations, ECD performance data, monitoring data, training records, and annual reports. Records are		

Audit Item	Expected Finding	Status	Notes / Evidence
	organized and available for CDPHE inspection upon request. » *Ref: Reg 7, Part D (5-year retention); CDPHE inspection authority*		

Corrective Actions Summary

#	Finding	Corrective Action	Responsible	Due Date
1				
2				
3				
4				
5				

Audit Sign-Off

Auditor Name:

Auditor Signature:

Date Completed:

Reviewed By:

Review Date:

Status Key: C = Compliant | NC = Non-Compliant | NA = Not Applicable | NR = Needs Review