

**COLORADO COURT OF APPEALS**

2 East 14th Avenue  
Denver, CO 80203

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Appeal from Larimer County District Court  
The Honorable Gregory M. Lammons  
Case No. 13CV31385

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**Appellant:**

**CITY OF FORT COLLINS, COLORADO**

**v.**

**Appellee:**

**COLORADO OIL AND GAS ASSOCIATION**

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**Attorneys:**

SULLIVAN GREEN SEAVY LLC  
Barbara J. B. Green, Atty. Reg. #15022  
John T. Sullivan, Atty. Reg. #17069  
3223 Arapahoe Avenue, Suite 300  
Boulder, Colorado 80303  
Telephone Number: (303) 440-9101  
Facsimile Number: (303) 443-3914  
E-mail: [barbara@sullivangreenseavy.com](mailto:barbara@sullivangreenseavy.com)  
[john@sullivangreenseavy.com](mailto:john@sullivangreenseavy.com)

Carrie M. Daggett, Atty. Reg. #23316  
John R. Duval, Atty. Reg. #10185  
Fort Collins City Attorney's Office  
300 La Porte Avenue  
P. O. Box 580  
Fort Collins, CO 80522-0580  
Telephone Number: (970) 221-6520  
Facsimile Number: (970) 221-6327  
Email: [cdaggett@fcgov.com](mailto:cdaggett@fcgov.com)  
[jduval@fcgov.com](mailto:jduval@fcgov.com)

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Case Number: 2014CA001991

**DEFENDANT-APPELLANT CITY OF FORT COLLINS' REQUEST FOR  
ORAL ARGUMENT**

Defendant-Appellant City of Fort Collins, Colorado (the "City" or "Fort Collins") by and through its undersigned attorneys, Carrie M. Daggett and John R. Duval of the Fort Collins City Attorney's Office, and Barbara J. B. Green and John T. Sullivan of Sullivan Green Seavy LLC, submits its request for oral argument pursuant to C.A.R. 34(b)(2). Fort Collins believes that oral argument is appropriate in this case because the appeal involves important matters at the intersection of Colorado laws governing oil and gas development and operations and a local government's authority to regulate the impacts of such development and operations in order to protect the health, safety, and welfare of its citizens.

Dated this 10th day of April, 2015.

SULLIVAN GREEN SEAVY LLC

By: /s/ John T. Sullivan  
Barbara J. B. Green, No. 15022  
John T. Sullivan, No. 17069

CITY OF FORT COLLINS

By: /s/ John R. Duval  
Carrie M. Daggett, No. 23316, City Attorney  
John R. Duval, No. 10185, Deputy City Attorney

ATTORNEYS FOR DEFENDANT  
CITY OF FORT COLLINS

## **CERTIFICATE OF SERVICE**

I do hereby certify that on this 10th day of April, 2015, a true and correct copy of the foregoing pleading was served electronically via ICCES to the following persons:

Mark J. Mathews (mmathews@bhfs.com)  
Wayne F. Forman (wforman@bhfs.com)  
Michal D. Hoke (mhoke@bhfs.com)  
Justin L. Cohen (jcohen@bhfs.com)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
410 Seventeenth Street, Suite 2200  
Denver, Colorado 80202-4437

Amicus Curiae Citizens for a Healthy Fort Collins, Sierra Club, and Earthwork  
Kevin Lynch (klynch@law.du.edu)  
Brad Bartlett (bbartlett@law.du.edu)  
Environmental Law Clinic  
University of Denver Sturm College of Law  
2255 E. Evans Avenue, Suite 335  
Denver, CO 80208

Amicus Curiae City of Boulder  
Thomas A. Carr (carrt@bouldercolorado.gov)  
Office of the City Attorney  
P.O. Box 791  
Boulder, CO 80306

Amicus Curiae County of Boulder  
Jeffrey P. Robbins (robbins@grn-law.com)  
Goldman, Robbins & Nicholson P.C.  
P.O. Box 2270  
Durango, CO 81302

Amicus Curiae Colorado Municipal League  
Geoffrey T. Wilson (gwilson@cml.org)  
1144 Sherman Street  
Denver, CO 80203-2207

Amicus Curiae Congressman Jared Polis  
Courtney J. Krause (Courtneyjkrause@gmail.com)  
1212 Elm Street  
Denver, CO 80220

Amicus Curiae Conservation Colorado  
Michael Freeman (mfreeman@earthjustice.org)  
Earthjustice  
633 17th Street, Suite 1600  
Denver, Colorado 80202-3625

Amicus Curiae Northwest Colorado Council of Governments  
Torie Jarvis (qqwater@nwccog.org)  
PO Box 2308  
Silverthorne, CO 80498

Amicus Curiae National Association of Royalty Owners – Colorado Chapter:  
Thomas W. Niebrugge (tniebrugge@lindquist.com)  
Lindquist & Vennum LLP  
600 17th St., Suite 1800 South  
Denver, Colorado 80202

Amicus Curiae American Petroleum Institute  
Richard C. Kaufman (rkaufman@rcalaw.com)  
Allison P. Altaras (aaltaras@rcalaw.com)  
Ryley Carlock & Applewhite  
1700 Lincoln Street, Suite 3500  
Denver, Colorado 80203

Amicus Curiae Colorado Concern, Denver Metro Chamber of Commerce,  
Colorado Competitive Council, Colorado Motor Carriers Association, and  
Colorado Farm Bureau  
Jason R. Dunn (jdunn@bhfs.com)  
Brownstein Hyatt Farber Schreck, LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO 80202-4432

/s/ Mary Keyes

Mary Keyes

Sullivan Green Seavy LLC