Holland & Hart



PRACTICES

Environmental
Environmental Litigation
Climate Change
Environmental Health and Safety
Environmental Transactions

INDUSTRIES

Energy and Resources
Oil and Gas
Mining
Oil and Gas Litigation
Oil and Gas Regulatory

EDUCATION

University of Texas School of Law, J.D., 2013

Middlebury College, B.A., 2007

BAR ADMISSIONS

Colorado
Texas
New Mexico

COURT ADMISSIONS

U.S. Court of Appeals for the Tenth Circuit
U.S. Court of Appeals for the District of Columbia
U.S. Court of Appeals for the Eighth Circuit

Aaron Tucker

Partner

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Aaron provides clients with effective assistance and representation on a variety of environmental compliance, enforcement, and litigation issues.

With a focus on air quality, Aaron counsels clients on permitting, compliance and enforcement, and rulemaking. He works closely with clients to provide practical guidance on navigating complex air and water quality issues that may arise during project development, operation, and closure. He also represents clients in enforcement actions before federal and state regulatory agencies, including the Environmental Protection Agency (EPA), the Colorado Department of Public Health and Environment (CDPHE), the Colorado Energy and Carbon Management Commission (CECMC), the New Mexico Environment Department (NMED) and the Texas Commission on Environmental Quality (TCEQ).

Aaron helps clients navigate regulatory and permitting requirements involving air and water quality, including the development of carbon capture, utilization, and storage (CCUS) projects. Clients look to Aaron for assistance with managing the risks, liabilities, and regulatory considerations of CCUS, including Class VI permitting for geologic sequestration.

Aaron previously worked at the Texas Commission on Environmental Quality where he represented the Office of Public Interest Counsel in various proceedings before the Commission, including rulemaking, enforcement, and contested case hearings at the State Office of Administrative Hearings over air, water, and waste permits.

EXPERIENCE

Aaron has experience with various environmental laws and regulations, including:

- Clean Air Act
- Colorado Air Quality Control Commission regulations
- Colorado Energy and Carbon Management Commission (formerly Oil and Gas Conservation Commission) regulations
- Clean Water Act
- Safe Drinking Water Act Underground Injection Control Program
- Administrative Procedures Act

- New Mexico Environment Department regulations
- Texas Commission on Environmental Quality regulations

Clients look to Aaron for assistance meeting ever-changing regulatory standards:

- Compliance with state and federal air quality regulations, including implementation of Colorado and New Mexico's oil and gas regulations
- Permitting and licensing processes for energy and natural resource facilities
- Permitting of CCUS projects, including Class VI wells
- Guidance on self-compliance environmental audits
- Development of federal and state regulations through hearings and written comments
- Negotiating settlements of violations

CLIENT RESULTS

- Represents clients in resolution of federal and state environmental enforcement actions.
- Provides strategic counsel on clients' operations for federal and state air permitting and compliance issues.
- Managed and counseled clients on environmental audits.
- Represented oil and gas midstream production company in successful appeal of two adverse Title V permitting decisions by EPA.
- Successfully represented a client in the appeal of an unfavorable greenhouse gas (GHG) determination by the Air Pollution Control Division.

PUBLICATIONS

"EPA Proposes to Hand Utah the Keys to Class VI Carbon Storage Permitting," *Environmental Law Update*, October 23, 2026

"New PM2.5 Designations Could Shape Economic Development Across the West," *Air Quality Update*, October 20, 2026

"Colorado Assumes Permitting Authority for Class VI Geologic Sequestration Wells," *Environmental Law Update*, October 19, 2026

"EPA Eases Clean Air Rules for Faster Construction and Data Center Development," *Air Quality Update*, May 14, 2026

"Supreme Court Declines to Limit Environmental Citizen Suits," *Environmental Update*, July 10, 2025

"New Mexico Stiffens Penalties for Air Quality Violations and Tightens Environmental Audit Policy," *Air Quality Update*, September 16, 2024

"EPA Imposes Stringent Greenhouse Gas Rule for Fossil Fuel-Fired Power Plants," *Air Quality Update*, April 25, 2024

"EPA Tightens the Annual $PM_{2.5}$ Standard, Creating Compliance Challenges Across the West," *Air Quality Update*, February 9, 2024

"Colorado Legislative 2024 Preview: Energy and Environmental Issues," *Government Affairs Update*, January 5, 2024

"New Mexico Announces New Crack Down on O&G Operations," *Oil and Gas Legal Update*, October 26, 2023

"EPA Doubles Down on Enforcement to Address Climate Change," *Holland & Hart Environmental Update*, October 19, 2023

"Tenth Circuit Ruling on Temporary Emissions in Colorado Will Have Widespread Impacts on Air Permitting in Western States," *Holland & Hart Legal Update*, September 22, 2023

"GHG Standards for the Power Sector: Is Third Time the Charm or Is It Déjà Vu?," *Holland & Hart Legal Update*, May 15, 2023

"EPA Super Sizes Proposal to Crack Down on Methane from Oil and Gas Sector," *Holland & Hart Client Alert*, December 7, 2022

"Bipartisan Infrastructure Bill Invests Billions in CCUS," *Holland & Hart News Update*, November 19, 2021

SPEAKING ENGAGEMENTS

"Emerging CCUS and Hydrogen Trends," Co-Presenter, *2023 Environment & Natural Resources Summit*, October 27, 2023

RECOGNITION

- *Best Lawyers: Ones to Watch in America*™, Environmental Law, 2023-2025
- *Chambers USA,* Environment, Up and Coming, 2025, 2026

PROFESSIONAL AND CIVIC AFFILIATIONS

- Colorado Bar Association, Environmental Section, Member 2019-present
- Institute for Energy Law Young Energy Professional Advisory Board Member