

# Clean Energy & Sustainability

## NEWSLETTER



Fall 2025

## Colorado's Producer Responsibility Program for Statewide Recycling Act

Contact a DGS attorney in the [Clean Energy & Sustainability Group](#) if you have any questions about the contents of this newsletter or if we can assist you with any legal needs.

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by [Lindsay Dofelmier](#) and [John Jacus](#)

Colorado's Producer Responsibility Program for Statewide Recycling Act, HB22-1355 (the "Act"), establishes a mandatory extended producer responsibility ("EPR") framework for packaging materials and paper products.<sup>[1]</sup> This framework shifts the cost of recycling packaging and paper products from local governments and consumers to the producers that introduce these materials into the marketplace by requiring the producers to fund a statewide recycling system to recycle those materials. [Read more...](#)

## The Trump Administration's Progress to Site Data Centers on Federal Lands: Initial Steps but Work Remains

by [Katie Schroder](#)

In July 2025, President Trump issued an [executive order](#) setting forth a presidential priority "to facilitate the rapid and efficient buildout" of data centers and associated infrastructure, including power generation sources and associated transmission lines. To further this goal, the order directs the utilization of "federally owned land and resources for the expeditious and orderly development of data centers." Additionally, the order calls for the identification of Brownfield and Superfund sites for data center development. [Read more...](#)

# A Foster Home for Orphaned Wells? States Explore Geothermal Energy Generation on Existing Oil & Gas Infrastructure

by [Brian Annes](#) and [John Siragusa](#)

Recent years have seen an explosion of interest in “deep” geothermal development – projects targeting energy extracted from heat sources hundreds of meters below the surface and available 24/7 as a baseload power source. As geothermal innovators seek to prove viability of their technologies and heat resources, driving down the per megawatt cost to be comparable to existing energy sources, legislatures in North Dakota and New Mexico have stepped in this year to encourage the use of existing infrastructure and know-how from the oil and gas sector for geothermal energy development. [Read more...](#)

## Current Developments, Highlights & News to Explore

by [Mave Gasaway](#)

- Last month, Deloitte released its [2026 Renewable Energy Industry Outlook](#)
- Potential New FERC Regulations on Interconnection of AI Data Centers
- Litigation Update – Trump Blocks on Wind Industry
- EPA Seeks to Dismantle "Solar for All," Litigation Ensues

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## ContourGlobal Closes its First U.S. Renewable Tax Equity Investment & Project Financing Valued at More Than \$350M

Recently, Davis Graham represented ContourGlobal as local counsel alongside Norton Rose Fulbright US LLP, in its first U.S. renewable tax equity investment and project financing valued at more than \$350M USD, called Black Hollow Sun. Black Hollow Sun is ContourGlobal’s two-phase solar project in Weld County, Colorado. Phase one of the project is already operational and delivering electricity to Platte River Power Authority, 13 a community-owned utility serving Fort Collins, Loveland, Estes Park, and Longmont. Phase two is expected to be completed by the end of 2026 and will become the largest photovoltaic installation in Northern Colorado, capable of producing enough clean electricity to power more than 73,000 homes per year. ContourGlobal is an independent power generation company based in London that owns, develops, and operates a diversified portfolio of renewable, thermal, and hybrid power assets,

including wind, solar, and hydro power plants and battery energy storage systems. They produce mature and cost-effective electricity generation and storage technologies, and they currently have assets across the Americas, Europe, and Africa. [Read more...](#)

## About Davis Graham's Clean Energy & Sustainability Practice

For more than 100 years, Davis Graham & Stubbs LLP has been synonymous with sophisticated legal experience in the energy sector. Our Clean Energy & Sustainability Group offers comprehensive support for clean energy projects, including financing, site acquisition/control, permitting, environmental compliance, and contracts. We manage projects relating to wind, solar, geothermal, hydrogen, biomass, renewable energy storage, and carbon capture, and sequestration. We provide guidance on federal, state, and local regulatory compliance, interconnection agreements, power purchase agreements and tax incentives. In addition, we advise on ESG, sustainability practices, and compliance with the 2030 UN Sustainable Development Agenda. Our multidisciplinary approach and proximity to key renewable ventures ensure clients receive expert counsel in planning, financing, and expanding their clean energy operations.