



Seasonal Readiness

The season changes. The mission doesn't.

October 2026 edition · Winter Diesel and Cold-Weather Operations

PP-SEASON-2026-10-13 | Verified: Oct 13, 2026, 12:20 AM MT | Edition 1

QUESTION THE HYPE. KEEP IT FLOWING.

SOURCED. NOT SOLD.

Bottom line. Colorado's commercial chain-carry season is already in force and runs through May 31. Diesel enters winter expensive and tight: EIA reports U.S. retail diesel averaged \$6.2900/gal in September, and the Rocky Mountain on-highway average was \$6.2670/gal for the week of October 5, up \$2.5960/gal from a year earlier. Colorado also cuts the distributor fuel-loss allowance for tax periods starting January 1, 2027.

1. What changes and when

Colorado CMV Must Carry Law (Sept. 1 to May 31). Vehicles with a GVWR or GCWR of 16,001 lb or more used in commerce must carry chains or approved traction devices on seven corridors: I-70 west of MP 259 (Morrison); CO 9, MP 63-97; US 40 west of MP 256; US 50 west of MP 225; US 160 west of MP 304; US 285 west of MP 250; and US 550, MP 0-130. Pickups pulling trailers that meet the weight threshold (hot-shot setups) are covered. CDOT's August 2026 fact sheet lists these fines: not carrying, \$100 plus a \$32 surcharge; not chaining when the law is called, up to \$500 plus \$78; stuck and blocking a lane, \$1,000 plus \$156. The Colorado State Patrol page lists the surcharges as \$79 and \$157. CMVs must stay in the right lane through May 31, and oversize/overweight loads face I-70 winter travel restrictions from Dec. 1 to Mar. 31.

Light-duty traction law. Colorado HB26-1237, signed May 5, 2026, removes the four- and all-wheel-drive references from the state traction-device statute. Two-wheel-drive service pickups now face the same tire or traction-device requirement when CDOT activates the traction law. In Utah, HB 196 (effective May 7, 2025) lets UDOT activate the traction law on a forecast and applies it statewide, with fines of up to \$750.

Winter diesel. ASTM D975 sets no fixed cloud point. It says low-temperature properties "should be agreed upon between the fuel supplier and purchaser," and its Appendix X5 gives monthly 10th-percentile minimum temperatures by state for October through March. We found no public, verified switch date for Mountain West terminals. CHS, a regional supplier, advises planning for seasonal blending by October and switching once overnight lows approach 32°F. It also notes that each 10% of #1 diesel blended in lowers cloud point by about 3°F. *Interpretation:* get the terminal's winter cloud point and CFPP from your supplier in writing, then compare them with the X5 value for each county you serve.

Colorado fuel tax, Jan. 1, 2027. HB26-1289 (signed June 3, 2026) reduces the distributor allowance for losses in transit and unloading from 2% and repeals the 0.5% deduction for collection costs and bad debt, for tax periods beginning on or after Jan. 1, 2027. The enrolled text is inconsistent on the new rate. One section reads 1.5%, while the conforming language and the legislative declaration say 1%. Confirm the final figure with the Colorado Department of Revenue before you reprice.

2. Operational readiness checklist

Interpretation: practices drawn from the cited public sources, not regulatory requirements unless a rule is named.

DISPATCH

- Check every route and unit against the seven must-carry corridors, including trailer-pulling pickups that meet the weight threshold.
- Enroll trucks in CDOT in-cab alerts and COtrip. Write detour and hold plans for closures at I-70 Floyd Hill, Eisenhower Tunnel, Vail Pass, and Glenwood Canyon.
- Rank critical accounts (hospitals, generators, livestock, keep-full) and front-load deliveries ahead of forecast storms.
- Don't plan around federal HOS relief. FMCSA emergency declarations are event-driven, may not cover your state, and never cover routine deliveries.

DRIVERS

- Inspect chain kits against the CDOT approved-device rules (for example, no cables on single-drive-axle combinations) and practice a chain-up before the first storm.
- Review 49 CFR 392.14: drivers must slow down in snow or ice and stop when conditions become dangerous enough.
- Review the adverse-driving exception in 49 CFR 395.1(b)(1). It allows up to two extra hours, but only for conditions as defined in § 395.2, not for storms that were known at dispatch.
- Carry spare fuel filters and drain fleet water separators. Fuel in idle equipment outdoors gets colder than fuel in a tank (CHS).

PLANTS AND BULK STORAGE

- Record the cloud point or CFPP of every winter receipt. Additives usually lower CFPP and LTFT but not cloud point (NREL).
- Store biodiesel blends 5-10°F above their cloud point. Heat and insulate aboveground lines, pumps, and dispensers; underground storage normally stays above 45°F (NREL).
- Drain water from tank bottoms before the first hard freeze. *Interpretation:* treat with cold-flow improver while the fuel is still above its cloud point. Once wax has formed, additives can't reverse it.
- Assemble a gelled-fuel response kit: spare filters, a heated space or approved heater, and emergency de-gel product. Write a call script for customers, and tell them to change filters after a gelling event because crystals can persist (CHS).

ACCOUNTING

- With diesel above \$6.0000/gal, the same gallons carry larger receivables. Review credit limits and terms before peak-season volume arrives.
- Update Colorado tax workpapers and pricing for the Jan. 1, 2027 loss-allowance change, and note the repeal of the 0.5% collection deduction.
- Decide ahead of time who pays chain-law citations, and tell customers in advance how winter-blend and additive charges will appear on invoices.

3. Regulatory and supply dates in the window

Date	Item
Sept. 1, 2026 to May 31, 2027	Colorado must-carry law and CMV right-lane restriction (CDOT, CSP)
Oct. 6, 2026	EIA October STEO: retail distillate expected above \$6.0000/gal in October and diesel to average about \$4.5000/gal in 2027; U.S. distillate stocks below the 2021-2025 average throughout the forecast
Dec. 1, 2026 to Mar. 31, 2027	Oversize/overweight winter travel restrictions on I-70 (CDOT)
Jan. 1, 2027	Colorado HB26-1289 loss-allowance cut and repeal of the 0.5% collection deduction take effect
Event-driven	FMCSA emergency declarations. Last winter's heating-fuels declaration No. 2025-013 (Dec. 23, 2025, extended to Feb. 28, 2026) covered 10 Midwest states, not Colorado, Wyoming, or Utah, and relieved only § 395.3.

4. What went wrong in recent seasons

Cold took out Colorado's only refinery (2022-23). Extreme cold damaged equipment at Suncor's Commerce City refinery, which shut down on Dec. 24, 2022, with a staged restart that Suncor expected to run through Q1 2023. The governor's emergency order said the plant supplied roughly 50% of Colorado's diesel, and the order suspended truck weight and hours-of-service limits. EIA reported that Colorado retail gasoline rose \$1.3900/gal to \$4.1000/gal by Feb. 20, 2023. The Colorado Wyoming Petroleum Marketers Association warned that some stations would bag pumps. *Interpretation:* a secondary supply agreement and access to an alternate terminal belong in the winter plan.

Unchained trucks closed I-70 (2024-25). CDOT counted more than 200 spinout closures of I-70 between Glenwood Springs and Georgetown, up 40% from the prior winter. The Colorado State Patrol had written 425 traction and road-blocking citations by mid-March, and 338 of them went to commercial vehicles (Colorado Sun). CDOT reported more than 1,300 must-carry citations for the season (Land Line).

Heating-fuel strain drew HOS waivers (2025-26). FMCSA issued a Midwest heating-fuels declaration on Dec. 23, 2025, and extended it twice, to Feb. 28, 2026. A separate Northeast declaration followed a late-January storm. Neither covered Mountain West states. In January 2025, by contrast, a declaration covered all 48 contiguous states. *Interpretation:* relief depends on where the storm hits, so Mountain West carriers should plan to operate under standard HOS limits.

5. Three deeper reads

1. [CDOT Must Carry Law In-Depth Fact Sheet \(Aug. 2026\)](#): corridors, approved devices by axle setup, fines, and chain stations.
2. [NREL Biodiesel Handling and Use Guide, 6th ed.](#): cloud point, CFPP, additives, and storage temperatures for blends.
3. [EIA Short-Term Energy Outlook, October 2026](#): distillate price and inventory outlook and the Winter Fuels Outlook.

Sources: CSP chain law · HB26-1237 · HB26-1289 enrolled text · HB26-1289 status · Utah HB 196 · ASTM D975-24 (NCWM) · CHS freeze warning · EIA weekly diesel · 49 CFR 392.14 · 49 CFR 395.1 · FMCSA Decl. 2025-013 · NEFI, Jan. 2026 · Jan. 2025 declaration · EIA on Suncor · CPR · Longmont Leader · Colorado Sun · Land Line

Also from Pipeline Punks: the **Compliance Deadline Radar** (rules and dates). Sign up or pick your briefs at truenorthstrategyops.com/pipeline-punks, or email jacob@truenorthstrategyops.com.



Pipeline Punks · *Question the hype. Keep it flowing.*

Published by True North Data Strategies LLC · *Turning Data into Direction*

Jacob Johnston | 719-204-6365 | jacob@truenorthstrategyops.com

Sourced. Not sold. | Verified sources. Labeled claims. Clearly disclosed sponsorships.