BLM AIR RESOURCES TECHNICAL REPORT FOR OIL AND GAS DEVELOPMENT IN NEW MEXICO, OKLAHOMA, TEXAS AND KANSAS

BLM AR TECH RPT 2019

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1. INTRODUCTION

The purpose of this document is to collect, present, discuss and summarize technical information on air quality, air quality related values, greenhouse gas emissions and climate change relative to air resources with the BLM New State Office Planning areas (New Mexico, Oklahoma, Texas and Kansas). Much of the information contained in this document is directly related to air quality in the context of oil and gas development; other information is generalized air quality that can be applied to other development scenarios and assessments. This information can then be incorporated by reference into the site-specific National Environmental Policy Act (NEPA) documents (Environmental Assessment (EA), Application for Permit to Drill (APD), etc) as necessary. In addition, data is included in the appendices which can be incorporated into the site-specific analysis included in the APD EAs.

Because the Bureau of Land Management (BLM) manages extensive land holdings in New Mexico, far more of its activities are centered there. The BLM has jurisdiction over mineral rights on federal lands managed by other agencies and on split estate lands in Kansas, Texas and Oklahoma. Wherever possible, information for those states is included.

In December 2019, an update to this document was completed that incorporates the latest available air quality data, and information about regulatory changes that have occurred since March 2018 and new scientific data that is relevant to air quality, greenhouse gases and climate change. New information was added about Kansas, Texas and Oklahoma air quality data to comprehensively address air quality in all areas where the BLM New Mexico State Office has jurisdiction.

1.1 AIR RESOURCES

Air quality, greenhouse gases and climate are components of air resources which may be affected by BLM applications, activities, and resource management. Therefore, the BLM must consider and analyze the potential effects of BLM and BLM-authorized activities on air resources as part of the planning and decision-making process. In particular, the activities surrounding oil and gas development are likely to have impacts related to air resources.

1.2 AIR QUALITY

The Clean Air Act, as amended, is the primary authority for regulation and protection of air quality in the United States. The Federal Land Policy and Management Act (FLPMA) also charges BLM with the responsibility to protect air and atmospheric values. Additionally, each state, tribe or local government holds additional authority for regulating air quality within their unique jurisdiction.

1.3 CLASS I AREAS AND THE CLEAN AIR ACT

All areas of the United States not specifically classified as Class I by the Clean Air Act are considered to be Class II for air quality. Class I areas are afforded the highest level of protection by the Clean Air Act and include all international parks, national wilderness areas and national memorial parks >5,000 acres, and national parks >6,000 acres in size which were in existence on August 7, 1977. Moderate amounts

of air quality degradation are allowed in Class II areas. While the Clean Air Act allows for designation of Class III areas where greater amounts of degradation would be allowed, no areas have been successful in receiving such designation by the EPA. Air quality in a given area is determined by levels and chemistry of atmospheric pollutants, dispersion meteorology, and terrain.

Regulation and enforcement of the NAAQS has been delegated to the states by the EPA. New Mexico Ambient Air Quality Standards (NMAAQS) are also shown, see Table 1. Oklahoma, Kansas and Texas do not have state standards for criteria pollutants that differ from the NAAQS.

The regulatory authority for air quality in Kansas is the Kansas Department of Health and Environment, Bureau of Air. The state does not have any ambient air quality standards that differ from the NAAQS, see Table 1, (KDHE BoA 2019).

The regulatory authority for air quality in Oklahoma is the Oklahoma Department of Environmental Quality, Air Quality Division. Oklahoma's ambient air quality standards are identical with the NAAQS, see Table 1, (ODEQ AQD 2019).

The regulatory authority for air quality in Texas is the Texas Commission on Environmental Quality (TCEQ), Air Division. The state does not have any ambient air quality standards that differ from the NAAQS, see Table 1, (TCEQ 2019a).

2 CRITERIA AIR POLLUTANTS

The U.S. Environmental Protection Agency (EPA) has the primary responsibility for regulating atmospheric emissions, including six nationally regulated air pollutants defined in the Clean Air Act. These pollutants, referred to as "criteria pollutants," include carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM_{10} & $PM_{2.5}$), sulfur dioxide (SO_2) and lead (Pb). The Clean Air Act charges EPA with establishing and periodically reviewing National Ambient Air Quality Standards (NAAQS) for each criteria pollutant. Table 1 shows the current NAAQS for each pollutant. Regulation and enforcement of the NAAQS has been delegated to the states by the EPA. New Mexico Ambient Air Quality Standards (NMAAQS) are also shown. Oklahoma, Kansas and Texas do not have state standards for criteria pollutants that differ from the NAAQS.

Table 1. National Ambient Air Quality Standards, NAAQS

	Primary Standards		Secondary Standards		New Mexico AAQS
Pollutant	**Level**	**Averaging Time**	**Level**	**Averaging Time**	
Carbon Monoxide (CO)	9 ppm (10 mg/m^3)	8-hour [(1)]	None		8.7ppm

	35 ppm (40 mg/m^3)	1-hour [1]		13.1 ppm
Lead (Pb)	0.15 µg/m^3	Rolling 3-Month Average[2]	Same as Primary	None
Nitrogen Dioxide (NO2 or NOx)	53 ppb	Annual (Arithmetic Average)	Same as Primary	50ppb
	100 ppb	1-hour [3]	None	100ppb (24-hour)
Particulate Matter (PM_{10})	150 µg/m^3	24-hour [4]	Same as Primary	*
Particulate Matter ($PM_{2.5}$)	12.0 µg/m^3	Annual [5] (Arithmetic Average)	15.0 ug/m^3 (Annual) [5] (Arithmetic Average)	*
	35 µg/m^3	24-hour [6]	Same as Primary	*
Ozone (O_3)	0.070 ppm	8-hour [7]	Same as Primary	None
Sulfur Dioxide (SO2 or SOx)	75 ppb	1-hour[8]	0.5 ppm [1] (3-hour)	0.02 ppm (annual)** 0.10 ppm (24-hour)**

Source: EPA 2019a

*The New Mexico Environmental Improvement Board (EIB) repealed the Total Suspended Particle (TSP) New Mexico Ambient Air Quality Standard (NMAAQS) in 20.2.3 NMAC, Ambient Air Quality Standards effective Nov. 30, 2018.

** For additional standards of air quality related to sulfur compounds in specific areas like Chino mines company smelter furnace stack at Hurley and the Pecos-Permian basin intrastate air quality control region, see NMAC 20.2.3 and also Table 5 of this report.

[1] Not to be exceeded more than once per year.

[2] Not to be exceeded.

[3] To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 100 ppb (effective January 22, 2010).

[4] Not to be exceeded more than once per year on average over 3 years.

[5] To attain this standard, the 3-year average of the weighted annual mean PM2.5 concentrations from single or multiple community-oriented monitors must not be exceeded.

[6] To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed 35 µg/m^3 (effective December 17, 2006).

(7) To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.070 ppm.

(8) To attain this standard, the 3-year average of the 99th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 75 ppb.

2.1 OZONE (O_3) AND VOLATILE ORGANIC COMPOUNDS (VOCS)

The current NAAQS for ozone is the three-year average of the annual fourth-highest daily maximum 8-hour average ozone concentration, which for simplicity is sometimes referred to as the "design value." Between 1997 and 2008, the NAAQS for ozone was 0.080 ppm. To attain this standard, the design value for ozone at any monitor in the U.S. could not exceed 0.084 ppm. In 2008, the NAAQS for ozone was lowered to 0.075 ppm. In 2015, the NAAQS for ozone was lowered to 0.070 ppm. Ground level ozone is not emitted directly into the air but is created by chemical reactions between indicators: NO_x (oxides of nitrogen) and volatile organic compounds (VOCs), in the presence of sunlight. While ozone and NO_2 are criteria air pollutants, VOCs are not. Figure 1 uses a graphical representation to show how ozone is created in the atmosphere.

VOCs are components of natural gas and may be emitted from well drilling, operations and from equipment leaks, valves, pipes and pneumatic devices. More information on VOCs during the well completion process is discussed further in the report. NOx emissions are discussed below under NO_2. Emissions from industrial facilities and electric utilities, motor vehicle exhaust, gasoline vapors, and chemical solvents are some of the major sources of NO_x and VOCs (EPA 2014a). Additionally, VOCs are emitted from a variety of sources, such as refineries, oil and gas production equipment, consumer products and natural (biogenic) sources, such as trees and plants.

Ozone is most likely to reach unhealthy levels on hot sunny days in urban environments but can still reach high levels during colder months. Ozone can also be transported long distances by wind, so even rural areas can experience high ozone levels (EPA 2019b).

People most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with certain genetic characteristics, and people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from ozone exposure (EPA 2019b).

Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and airway inflammation. It also can reduce lung function and harm lung tissue. Ozone can worsen bronchitis, emphysema, and asthma, leading to increased medical care. The environmental effects of ozone include damaging sensitive vegetation and ecosystems, including forests, parks, wildlife refuges and wilderness areas. In particular, ozone harms sensitive vegetation during the growing season (EPA 2019b).

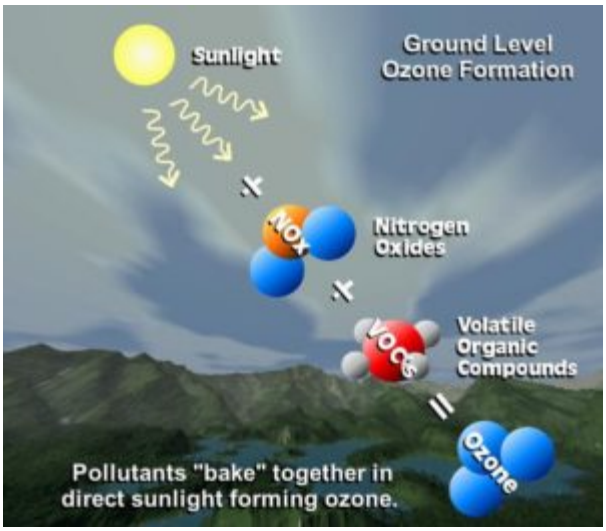


Figure 1. Ozone Formation, Courtesy of (NASA)

2.1.1 OZONE TRENDS

Nationally, ozone concentrations at urban and rural sites have decreased 31% from 1980 to 2018. Weather conditions have a significant role in the formation of ozone. Ozone is most readily formed on warm summer days when there is stagnation. Because of this role that weather plays in ozone production, EPA uses a model to account for weather-related variability of ozone concentrations and provide a more accurate assessment of the underlying trend in ozone precursor emissions. Removing the effects of weather, national ozone concentrations in rural areas have decreased approximately 19% from 2000 to 2018. In Carlsbad, NM, removing the effects of weather, ozone concentrations increased 19% between 2000 and 2018, while ozone concentrations in Farmington, NM saw decreasing and increasing trends of 51 ppb in 2009 to 64 ppb in 2018; by 2018 the concentration was approximately the same as 2000. Ozone concentrations in Tulsa, Oklahoma decreased 17% from 2000 to 2018 and in Oklahoma City decreased 10% from 2000 to 2018. Removing the effects of weather, ozone concentrations in Wichita, Kansas decreased 15% between 2000 and 2018. In Texas, ozone concentrations decreased substantially removing the effects of weather, especially in large urban areas. Houston, Longview and Dallas ozone concentrations decreased from 15-27% between 2000 and 2018, while concentrations in Austin and El Paso decreased by 7-12%. San Antonio's ozone concentrations decreased 9% between 2000 and 2018, removing the effects of weather (EPA 2018a).

2.2 NITROGEN DIOXIDE (NO2)

NO_2 is both a criteria pollutant and an indicator for the NO_x family of nitrogen oxide compounds that are ground-level ozone precursors. The nitrogen oxide family of compounds includes nitric oxide (NO), nitrogen dioxide (NO_2), nitrous acid ($HN0_2$), and nitric acid (HNO_3). The primary sources of NO_x nationally are motor vehicles and fuel combustion. The excess air required for complete combustion of fuels in these processes introduces atmospheric nitrogen into the combustion reactions at high temperatures

and produces nitrogen oxides. NO_2 has been shown to cause adverse respiratory impacts in both healthy people and those with asthma and is also an important contributor to the formation of ground-level ozone (EPA 2014b).

Nationally, NO_2 concentrations have decreased substantially (61% reduction) from 1980 to 2018. In the southwest (Arizona, New Mexico, Colorado and Utah), NO_2 concentrations have decreased 35% between 2000 and 2018; in the south (Texas, Oklahoma, Kansas, Arkansas, Louisiana and Mississippi), NO_2 concentrations have decreased 31% between 2000 and 2018. EPA expects NO_2 concentrations will continue to decrease (EPA 2016a). EPA's national and regional rules to reduce emissions of NO2 and NOx will help state and local governments meet the National Ambient Air Quality Standard (NAAQS).

2.3 CARBON MONOXIDE (CO)

Carbon monoxide is produced from the incomplete burning of carbon-containing compounds such as fossil fuels; it forms when there is not enough oxygen to produce carbon dioxide (CO_2). Nationally, 86% of CO emissions come from transportation sources. CO is associated with negative health effects to human cardiovascular, central nervous, and respiratory systems (EPA 2014c).

Nationally, CO concentrations have decreased 83% from 1980 to 2018. Monitored CO concentrations in the "southwest" region (New Mexico, Arizona, Colorado and Utah) have decreased 62% between 2000 and 2018. Monitored CO concentrations in the "south" region (Texas, Oklahoma, Kansas, Arkansas, Louisiana and Mississippi) have decreased 69% between 2000 and 2018 (EPA 2016b).

2.4 PARTICULATE MATTER (PM)

Particulate matter, also known as particle pollution or PM, is a complex mixture of extremely small particles and liquid droplets. PM is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. PM is measured and regulated according to particle size. PM_{10} refers to all particles with a diameter of 10 microns or less. $PM_{2.5}$ is made up of particles with diameters of 2.5 microns or less. Smaller particles are associated with more negative health effects, including respiratory and cardiovascular problems because they can become more deeply embedded in the lungs (EPA 2013).

Nationally, $PM_{2.5}$ concentrations have decreased 39% from 2000 to 2018. In that same time period, PM_{10} concentrations decreased 31% nationally. In the Four Corners region (New Mexico, Arizona, Colorado and Utah), $PM_{2.5}$ concentrations have decreased 23% from 2000 to 2018, and PM_{10} concentrations have decreased 28% in the same time period. For the southern region encompassing Texas, Oklahoma, Kansas, Arkansas, Louisiana and Mississippi, $PM_{2.5}$ concentrations have decreased 30% and PM_{10} concentrations have increased 18% between 2000 and 2018 (EPA 2016c & EPA 2016d).

2.5 SULFUR DIOXIDE (SO2)

Sulfur dioxide (SO_2) is one of a group of highly reactive gases known as "oxides of sulfur," commonly referred to as SO_x. The largest sources of SO_2 emissions nationwide are from fossil fuel combustion at power plants (73%) and other industrial facilities (20%). Smaller sources of SO_2 emissions include industrial processes, such as extracting metal from ore, and the burning of high sulfur-containing fuels by locomotives, large ships, and non-road equipment. SO_2 is linked with a number of adverse effects on the respiratory system (EPA 2015a).

Nationally, SO_2 concentrations have decreased 80% from 2000 to 2018, but substantial decreases (91% reduction) have occurred since 1980 due to implementation of federal rules requiring reductions in SO_2 emissions from power plants and other large sources of SO_2. In the Four Corners region, SO_2 concentrations decreased 23% between 2000 and 2018. In the southern region of Texas, Oklahoma, Kansas, Arkansas, Louisiana and Mississippi, SO_2 concentrations decreased 76% between 2000 and 2018 (EPA 2015b).

2.6 LEAD

With the elimination of lead from gasoline and regulation of industrial sources, levels of lead in the atmosphere decreased 98% nationwide between 1980 and 2018. Lead concentrations decreased 93% nationally between 2000 and 2018. While still regulated as a criteria pollutant, the major sources of lead pollution are lead smelters and leaded aviation gasoline. In 2014, EPA proposed to retain the NAAQS for lead without revision (EPA 2014d).

2.7 MONITORING DATA AND DESIGN VALUES

Criteria pollutants are monitored for throughout various parts of the country. Monitors measure concentrations of pollutant in the atmosphere and the results are often presented in parts per million (ppm) or micrograms/cubic meter ($\mu g/m^3$). EPA and states periodically analyze and review monitor locations, discontinuing monitoring at locations where pollutant concentrations have been well below the standards and adding monitors in areas where pollutant concentrations may be approaching air quality standards. *Instantaneous on-demand* monitored outdoor air quality data collected from state, local and tribal monitoring agencies can be obtained from EPA's Air Data webpage and interactive tool (EPA 2017a).

Another type of monitoring data is *annual average concentration(s)* measured at air monitors which are then translated to annual design values to be consistent with the individual NAAQS in Table 1. A design value is a statistic that describes the air quality status of a given location relative to the level of the National Ambient Air Quality Standards (NAAQS). Design Values are normally updated annually and posted to the EPA's Air Quality Design Value website. The most recent, 2018 Design Values for the measured criteria pollutants of the counties in the major Oil and Gas (O&G) basins of New Mexico are provided in Tables 2 and 3.

Table 2. 2018 Design Values, Eddy and Lea Counties

Pollutant	2018 Design values	Averaging Time	NAAQS	NMAAQS[5]
O_3	0.074 parts per million (ppm) (Eddy County), 0.070 ppm (Lea County)	8-hour[1]	0.070 ppm	–
NO_2	5 parts per billion (ppb) (Eddy County), 5 ppb (Lea County)	Annual[2]	53 ppb	50 ppb
NO_2	23 ppb (Eddy County), 34 ppb (Lea County)	1-hour[3]	100 ppb	–
$PM_{2.5}$[4]	7.6 micrograms per cubic meter (µg/m^3) (Lea County)	Annual[4]	12 µg/m^3	–
$PM_{2.5}$	16 µg/m^3 (Lea County)	24-hour[3]	35 µg/m^3	–

Source: EPA 2019c

1 Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years.

2 Not to be exceeded during the year.

3 98th percentile, averaged over 3 years.

4 Annual mean, averaged over 3 years.

5 The New Mexico Ambient Air Quality Standards (NMAAQS) standard for total suspended particulates, which was used as a comparison for PM_{10} and $PM_{2.5}$, was repealed as of November 30, 2018.

Note: While there are no NAAQS for hydrogen sulfide (H_2S), New Mexico has set 1/2-hour standards for H_2S at 0.100 ppm within Pecos-Permian AQ Control Region and 0.030 ppm, for municipal boundaries and within five miles of municipalities with populations greater than 20,000 in areas of the state outside of the area within 5 miles of the Pecos-Permian AQ Control Region (See Table 5).

Table 3. Design Values for Rio Arriba, Sandoval, and San Juan Counties

Pollutant	2018 Design Concentrations	Averaging Time	NAAQS	NMAAQS[7]
O_3	Rio Arriba County: 0.067 ppm Sandoval County: 0.068 ppm San Juan County: 0.070 ppm, 3 stations; Bloomfield at 0.069 ppm, Navajo Dam at 0.070 ppm, Shiprock at 0.070 ppm	8-hour [1]	0.070 ppm	–
NO_2	San Juan County: 3 stations; Bloomfield at 10 ppb, Navajo Dam at 6 ppb, Shiprock at 3 ppb	Annual [2]	53 ppb	50 ppb
NO_2	San Juan County: Bloomfield at 34 ppb	1-hour [3]	100 ppb	–
SO_2	San Juan County: 2 ppb	1-hour [5]	75 ppb	–
$PM_{2.5}$	San Juan County: Invalid monitor data	Annual [4,6]	60 µg/m^3	–
$PM_{2.5}$	San Juan County: Invalid monitor data	24-hour [3,6]	35 µg/m^3	–

Source: EPA 2019c

1 Annual fourth highest daily maximum 8-hour concentration, averaged over 3 years.

2 Not to be exceeded during the year.

3 98th percentile, averaged over 3 years.

4 Annual mean, average over 3 years.

5 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years.

6 $PM_{2.5}$ monitor stations currently show installed locations in the planning area (San Juan County), however the monitor status of these stations show invalid data and cannot be used to represent design values.

7 The NMAAQS standard for total suspended particulates, which was used as a comparison with PM_{10} and $PM_{2.5}$, was repealed as of November 30, 2018.

Note: While there are no NAAQS for H_2S, New Mexico has set a 1-hour standard for H_2S at 0.010 ppm for all areas of the state outside of the area within 5 miles of the Pecos-Permian AQ Control Region.

2.8 GENERAL CONFORMITY AND NON-ATTAINMENT

If the concentration of one or more criteria pollutants in a geographic area is found to exceed the regulated or 'threshold' level for one or more of the NAAQS, the area may be classified as a **nonattainment** area. Areas with concentrations of criteria pollutants that are below the levels established by the NAAQS are considered either **attainment** or unclassifiable areas.

To eliminate or reduce the severity and number of NAAQS violations in non-attainment areas, and to achieve expeditious attainment of the NAAQS, the EPA promulgated the Conformity Rule (40 CFR 6, 51, 93). The Conformity Rule applies to federal actions and environmental analyses in non-attainment and maintenance areas completed after March 15, 1994. This rule contains a variety of substantive and procedural requirements to show conformance with both the NAAQS and state implementation plans.

Section 176(c) of the CAA prohibits federal agencies from taking actions in non-attainment and maintenance areas unless the emissions from the actions conform to the state implementation plan or tribal implementation plan for the area. Federal actions must be evaluated for conformity to the local state implementation plan if the project 1) is located within an EPA-designated non-attainment or maintenance area, 2) would result in emissions above major source threshold quantities of criteria pollutants, 3) is not a listed exempt action, and 4) has not been accounted for in an EPA-approved state implementation plan.

EPA's conformity rule requires that all federal actions in a non-attainment area must demonstrate conformity with the State Implementation Plan (SIP) for the pollutant in question. If the agency can demonstrate that emissions for the action will fall below certain established levels, known as de minimis, then no further analysis is necessary. In order to establish de minimis, an emissions inventory for the project is required. In the case of ozone, the emissions inventory would include NOx and VOCs. If emissions are projected to be above de minimis levels further analysis should be coordinated with the EPA and/or state agency.

Non-attainment areas in New Mexico are as follows:

- **O_3 Non-attainment Area in Dona Ana County (Sunland Park, New Mexico, located southwest of the CFO planning area, south of Las Cruces)** In 1995, the EPA declared a 42 square-mile region in the southeast corner of the County on the border of Texas and Mexico as a marginal nonattainment area for the 1-hour ozone standard. The nonattainment area included the City of Sunland Park, Santa Teresa, and La Union, New Mexico. The 1-hour ozone standard was revoked by EPA in 2004 with the adoption of the new 8-hour ozone standard. Due to the revocation of the 1979 1-hour ozone standard and based on monitoring data, Sunland Park was designated attainment for the 1997 8-hour ozone standard (0.080 ppm).

  In October 2015 the EPA again lowered the NAAQS for ozone from 0.075 ppm to 0.070 ppm. Due to the lowering of the federal standard, Governor Martinez recommended that a portion of Sunland Park, NM be designated as nonattainment of the new 8-hour ozone standard. On June 4, 2018 the EPA designated this area as nonattainment with an effective date of August 3, 2018 (FR 2018).

  NMED is working on the planning elements required for a marginal nonattainment classification, in the form of a State Implementation Plan revision that outlines the strategies and emissions

control measures that are expected to improve air quality in the Sunland Park area that has been designated nonattainment, by May 8, 2021. These strategies and emissions control measures would aim to reduce the amount of nitrogen oxides and volatile organic compounds emitted to the atmosphere. They may rely on current or upcoming federal rules, new or revised state rules, and other programs, such as the New Mexico VW mitigation plan projects (NMED 2019a).

NMED is also currently developing an Emissions Inventory for the nonattainment area to be submitted to EPA by August 3, 2020. In addition, the department must review its nonattainment permitting rules (NNSR) and adopt revisions, if required, to comply with federal law by August 3, 2021. The emissions inventory and NNSR review require revisions to New Mexico's State Implementation Plan (SIP) and will be subject to public review and hearing requirements (NMED 2019b).

- **O_3 Design Value Exceedance in Eddy County (Carlsbad, New Mexico)** In July 2019 new design values for NAAQS were published by the EPA for various counties throughout the United States. Two monitors, 2811 Holland St and Carlsbad Caverns National Park in Eddy County, Carlsbad-Artesia, NM show 8-hour ozone exceedances, 74 ppb and 71 ppb respectively (EPA 2019c).

  The New Mexico Environment Department (NMED) is required by State Statute to plan for ozone mitigation in areas where monitors indicate ozone levels within 95% of the ozone standard. The areas discussed above in Carlsbad, NM have not been formally declared non-attainment by the EPA through the state's recommendation.

  The Ozone Attainment Initiative is a project authorized by State Statute, 74-2-5.3 New Mexico Statutes Annotated 1978. This statute directs the New Mexico Environment Department to develop plans that may include regulations more stringent than Federal rules for areas of the state in which ambient monitoring shows ozone levels at or above 95% of the NAAQS. The 2015 8-hr primary National Ambient Air Quality Standard (NAAQS) for ozone is 0.070 ppm (or 70 ppb). Ninety-five percent (95%) of the ozone NAAQS is 0.067 ppm (67 ppb). This form of the standard requires averaging of three years of monitoring data for the fourth highest 8-hour average, using the most recent year's data to determine the "design value". For New Mexico, the following monitors show 3-year averages (2016 – 2018) of ozone levels at or above 95% of the NAAQS:

  - La Union (68 ppb) – Doña Ana County
  - Chaparral (71 ppb) – Doña Ana County
  - Desert View (74 ppb) – Doña Ana County
  - Santa Teresa (74 ppb) – Doña Ana County
  - Solano (67 ppb) – Doña Ana County
  - Holland St (71 ppb) – Eddy County
  - Carlsbad (74 ppb) – Eddy County
  - Hobbs (70 ppb) – Lea County
  - Coyote Ranger Station (67 ppb) – Rio Arriba County
  - Bernalillo (68 ppb) – Sandoval County

- Bloomfield (69 ppb) – San Juan County
- Navajo Lake (70 ppb) – San Juan County
- Substation (69 ppb) – San Juan County
- Los Lunas (67 ppb) – Valencia County

(NMED 2019c)

- **PM_{10} Non-attainment Area in Anthony, New Mexico (located west of the CFO planning area, south of Las Cruces)** The State of New Mexico submitted the Anthony PM_{10} state implementation plan to the regional EPA headquarters on November 8, 1991. This area was designated nonattainment for PM10 by the US Environmental Protection Agency (EPA) in 1991.The non-attainment area is bounded by Anthony Quadrangle, Anthony, New Mexico-Texas. SE/4 La Mesa 15-minute Quadrangle, N32 00 - W106 30/7.5, Sections 35 and 36, Township 26 South, Range 3 East as limited by the New Mexico-Texas state line on the south. The site is located in Doña Ana County, which submitted a Natural Events Action Plan for PM_{10} exceedances to the EPA in December 2000 (NMED 2019d).

  The NMED Air Quality Bureau developed a fugitive dust rule in conjunction with the mitigation plan to detail mandatory measures to abate certain controllable sources in Doña Ana and Luna Counties. A public hearing was held on September 28, 2018 in Las Cruces and the board adopted the rule on October 26, 2018. Mitigation plans are required by the EPA in areas where recurring natural events (in this case, high winds resulting in blowing dust) cause exceedances of the health based national standards for particulate matter. Some of the required elements of a mitigation plan include:
  - Steps to identify and study sources of dust;
  - Mandatory or voluntary control measures to abate sources of dust that cause or contribute to exceedances of the standards to better protect public health;
  - Public education and notification programs aimed at reducing individuals' exposure to unhealthy levels of particulate matter in the air before, during, and after high wind events; and·
  - Public review and periodic evaluation of the mitigation plan

  (NMED 2019e)
- **SO_2 Maintenance Area in Grant County (located west of the CFO planning area, at the Arizona border):** This maintenance area is located at the Phelps Dodge Chino Copper Smelter in Grant County. The maintenance area is defined as a 3.5-mile-radius region around the smelter. The maintenance area also includes high elevation areas within an 8-mile radius. The state submitted a state implementation plan to the regional EPA headquarters in August 1978. The New Mexico Air Quality Bureau submitted a re-designation plan to the EPA in February 2003. The re-designation plan was approved by the EPA in September 2003 (NMED 2019e).

- **TEXAS NONATTAINMENT AREAS:** There are currently nine key non-attainment areas in Texas, one for PM_{10} (El Paso), three for ozone (Houston-Galveston area, Dallas-Fort Worth area, and Bexar County in San Antonio) and several counties not meeting the SO_2 2010 standard and therefore designated in part as nonattainment (Anderson, Freestone, Panola, Rusk and Titis counties), (EPA 2019d).

The Houston-Galveston-Brazoria area has several areas in nonattainment status. The following counties are currently not meeting the 8-hour 2015 O_3 standard of 0.070 ppm (70 ppb), (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery and Waller). There are various designations of severity of the 2015 O_3 nonattainment ranging from Marginal to Severe. De minimis values for both NOx and VOC in this area are 25 tons/year (EPA 2019d).

The Dallas-Ft Worth area has several areas as well in nonattainment status. The following counties are currently not meeting the 8-hour 2015 O_3 standard of 0.070 ppm (70 ppb), (Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise). There are various designations of severity of the 2015 O_3 nonattainment ranging from Marginal to Severe. De minimis values in this area are 100 tons/yr for NOx and 50 tons/yr for VOC (EPA 2019d). De minimis values in this area are 100 tons/yr for NOx and 50 tons/yr for VOC.

KANSAS

There are currently no non-attainment areas for any criteria pollutant in the state of Kansas.

OKLAHOMA

There are currently no nonattainment areas in the state of Oklahoma.

3 NATIONAL EMISSIONS INVENTORY DATA (NEI) DATA

The NEI data presents the emissions of each criteria pollutant by national, state, county and tribal areas for major source sectors. National emissions trends are reported in the 2014 NEI Report (EPA 2017b). The NEI data is updated every three years with new emission inventory data incurring a 2-3 year data gathering period for final use. The most recent NEI Inventory is for 2014 and 2017 data is expected to be available for use sometime in the spring of 2020. Emissions data is expressed in tons per year (tpy) or total volume of pollutant released to the atmosphere. Emissions data is useful in comparing source categories to determine which industries or practices are contributing the most to the general level of pollution in an area.

Details of the anthropogenic sectors mentioned in the report are:

(1) Electricity generation is fuel combustion from electric utilities;

(2) Fossil fuel combustion is fuel combustion from industrial boilers, internal combustion engines, and commercial/institutional or residential use;

(3) Industrial processes include manufacturing of chemicals, metals, and electronics, storage and transfer operations, pulp and paper production, cement manufacturing, petroleum refineries, and oil and gas production;

(4) On-road vehicles category includes both gasoline- and diesel-powered vehicles for on-road use;

(5) Non-road equipment includes gasoline- and diesel-powered equipment for non-road use, as well as planes, trains, and ships;

(6) Road dust includes dust from both paved and unpaved roads. Presentation of emissions data by source sector provides a better understanding of the activities that contribute to criteria pollutant emissions.

NEI data, by pollutant (CO, NOx, PM10 & PM2.5, SO_x and well as VOCs), for the Major Sources within New Mexico, Kansas, Oklahoma and Texas can be found in Appendix A. Additionally, a graphical displaying the major sources are including in Appendix D. Please note that Major source data in Appendices A and D for CO is displayed and reported for 2011 NEI data. The other pollutants show 2014 NEI data.

3.1 2014 NATIONAL EMISSIONS INVENTORY NEI DATA

3.1.1 VOC EMISSIONS

The 2014 NEI for the entire state of New Mexico estimates VOC emissions from biogenic sources account for 82% of total VOCs in the state. VOCs from fire account for 2% and industrial processes account for 12% of total VOCs. According to the 2014 NEI, Texas biogenic emissions account for 72% of total VOC emissions, while industrial processes account for 17% of VOC emissions. VOC emissions from fire account for 2% of Texas VOC emissions, mobile sources account for 3% of total VOC emissions, and solvents account for 4% of total VOC emissions. In Oklahoma, biogenic emissions are estimated to be 69% of total VOC emissions, industrial processes account for 14%, fire accounts for 7% of total VOC emissions, and mobile sources account for 4% of total VOC emissions. In Kansas, biogenics account for 64% of total VOC emissions, fire accounts for 9% of VOC emissions, industrial processes account for 14% of VOC emissions, mobile sources account for 5% of VOC emissions, and solvents account for 6% of VOC emissions (EPA 2017b).

3.1.2 NOX EMISSIONS

The 2014 National Emissions Inventory data for the Farmington area (San Juan County), indicates that fuel combustion accounts for 56% of total NOx emissions, industrial sources account for 34% of total NOx emissions, and mobile sources account for 9% of total NOx emissions in the area (EPA 2017b).

The 2014 National Emissions Inventory data for the state of New Mexico indicate mobile sources account for 44%, fuel combustion accounts for 22%, industrial processes account for 19%, biogenics account for 13% and fire accounts for less than 1% of total NO_x emissions in the state. For Texas, the 2014 National Emissions Inventory data indicate mobile sources account for 47%, fuel combustion accounts for 19%, industrial processes account for 25%, biogenics account for 8% and fire accounts for less than 1% of total NO_x emissions in the state. In Oklahoma, mobile sources account for 35%, fuel combustion accounts for 29%, industrial processes account for 24%, biogenics account for 10% and fire accounts for 2% of total Oklahoma NO_x emissions. In Kansas, mobile sources account for 41%, fuel

combustion accounts for 20%, industrial processes account for 20%, biogenics account for 16% and fire accounts for 3% of total Kansas NO_x emissions (EPA 2017b).

3.1.3 CO EMISSIONS

For San Juan County, New Mexico (Farmington area), the 2014 National Emissions Inventory data indicate fires contribute 32%, mobile sources contribute 18%, fuel combustion contributes 15%, industrial processes contribute 21% and biogenics contribute 13% of total CO emissions in the county (EPA 2017b).

For New Mexico, the 2014 National Emissions Inventory data indicate mobile sources account for 34%, industrial processes account for 8%, fuel combustion accounts for 5%, fire accounts for 14% and biogenics account for 37% of total state CO emissions. The 2014 National Emissions inventory data for Texas indicate mobile sources account for 50%, fuel combustion accounts for 6%, industrial processes account for 5%, fire accounts for 14% and biogenics account for 21% of total Texas CO emissions. In Oklahoma, mobile sources account for 38%, fuel combustion accounts for 6%, industrial processes account for 7%, fire accounts for 36% and biogenics account for 11% of total CO emissions in the state. In Kansas, mobile sources account for 38%, fuel combustion accounts for 6%, industrial processes account for 9%, fire accounts for 33% and biogenics account for 13% of total CO emissions in the state (EPA 2017b).

3.1.4 PM2.5 AND PM10

For the Farmington area (San Juan County), the 2014 National Emissions Inventory data show that most particulate matter emissions are from dust ($PM_{2.5}$: 5,062 tons, 56%; PM_{10}: 48,187 tons, 87%) (EPA 2017b).

According to the 2014 National Emissions Inventory, for the entire state of New Mexico, dust accounts for 68% and fire accounts for 12% of $PM_{2.5}$ emissions statewide. For PM_{10}, dust accounts for 91% and fire accounts for 2% of emissions in New Mexico. For Texas, the 2014 National Emissions Inventory data indicate that dust accounts for 45%, fire accounts for 13%, agriculture accounts for 18%, mobile sources account for 6%, fuel combustion accounts for 6% and industrial processes accounts for 6% of statewide $PM_{2.5}$ emissions. Dust accounts for 75%, agriculture accounts for 16% and fire accounts for 3% of Texas PM_{10} emissions. In Oklahoma, fire accounts for 27%, dust accounts for 37%, agriculture accounts for 21%, fuel combustion accounts for 5%, industrial processes account for 4% and mobile sources account for 3% of Oklahoma $PM_{2.5}$ emissions. Dust accounts for 69%, agriculture accounts for 21% and fire accounts for 6% of Oklahoma PM_{10} emissions. In Kansas, dust accounts for 25%, agriculture accounts for 41%, fire accounts for 21%, mobile sources account for 4%, industrial sources account for 3% and fuel combustion accounts for 4% of Kansas $PM_{2.5}$ emissions. Agriculture accounts for 42%, dust accounts for 49% and fire accounts for 6% of Kansas PM_{10} emissions (EPA 2017b).

3.1.5 SO2 EMISSIONS

In the Farmington area nearly all SO_2 emissions come from fuel combustion (5,038 tons; 93%), while 4% of SO_2 emissions come from fires and 3% from industrial sources, according to the 2014 National Emissions Inventory (EPA 2017b).

The 2014 National Emissions Inventory data indicate industrial sources account for 46%, fuel combustion accounts for 44%, fires account for 5%, and mobile sources account for 4%, of New Mexico SO_2 emissions. Fuel combustion accounts for 78% and industrial processes account for 20% of Texas SO_2 emissions. Fuel combustion accounts for 73%, industrial processes account for 22% and fire accounts for 4% of Oklahoma SO_2 emissions. Fuel combustion accounts for 79%, fire accounts for 8% and industrial processes account for 11% of Kansas SO_2 emissions (EPA 2017b).

3.1.6 PB EMISSIONS

According to the 2014 National Emissions Inventory, aircraft account for 77% of the lead emissions in New Mexico. In Texas, 79% of the lead emissions are from aircraft. In Oklahoma, 47% of lead emissions are from aircraft and 29% are from waste disposal. In Kansas, 81% of lead emissions are from aircraft (EPA 2017b).

4 HAZARDOUS AIR POLLUTANTS

Currently there are 187 specific pollutants and chemical groups known as hazardous air pollutants (HAPs). The list has been modified over time. HAPs are chemicals or compounds that are known or suspected to cause cancer or other serious health effects, such as compromises to immune and reproductive systems, birth defects, developmental disorders, or adverse environmental effects and may result from either chronic (long-term) and/or acute (short-term) exposure. CAA Sections 111 and 112 establish mechanisms for controlling HAPs from stationary sources, and the EPA is required to control emissions of the 187 HAPs. The U.S. Congress amended the Federal Clean Air Act in 1990 to address a large number of air pollutants that are known to cause or may reasonably be anticipated to cause adverse effects to human health or adverse environmental effects.

Ambient air quality standards do not exist for HAPs, however the Clean Air Act requires control measures for HAPs. Mass-based emissions limits and risk based exposure thresholds have been established as significance criteria to require maximum achievable control technologies (MACT) under the EPA promulgated National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for 96 industrial source classes. NESHAPs are issued by EPA to limit the release of specified HAPs from specific industrial sectors. These standards are technology based, meaning that they represent the MACT that are economically feasible for an industrial sector.

NESHAPs for Oil and Natural Gas Production and Natural Gas Transmission and Storage were published by EPA on June 17, 1999. These NESHAPs were directed toward major sources and intended to control benzene, toluene, ethyl benzene, mixed xylenes (BTEX) and n-hexane. An additional NESHAP for Oil and

Natural Gas Production Facilities directed toward area sources was published on January 3, 2007 and specifically addresses benzene emissions from triethylene glycol dehydrations units. The EPA issued a final rule revising the NESHAP rule effective October 15, 2012. The final rule includes revisions to the existing leak detection and repair requirements and established emission limits reflecting maximum achievable control technology for currently uncontrolled emission sources in oil and gas production and natural gas transmission and storage (Fed. Reg. 77(159): 49490-49600, August 16, 2012).

The EPA rules that are most likely to have applicability to oil and gas operations are as follows (in addition to the New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAPs) common/general provisions):

- NSPS Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
- NESHAP Subpart HH - National Emission Standard for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities
- NESHAP Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
- NSPS OOOO Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution –
- NSPS OOOOa Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced after September 18, 2015: New Source Performance Standards (NSPS)- Originally this rule and its draft was promulgated to regulate VOC and GHG emissions (methane) from specific sources within the oil and natural gas industry which would have included new, modified, and reconstructed compressors, pneumatic controllers, pneumatic pumps, well completions, fugitive emissions from well sites and compressor stations, and equipment leaks at natural gas processing plants. In September of 2018 and August of 2019 the EPA proposed changes to the rule to modify, amend and/or rescind requirements for the 2012 and 2016 NSPS for the Oil and Gas Industry.

The CAA defines a major source for HAPs to be one emitting 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs. Under state regulations, a construction or operating permit may be required for any major source though some exceptions apply. In New Mexico, these regulations are 20.2.70 and 20.2.73 NMAC, in Texas the regulation is 30 TAC 122, in Kansas, the regulation is K.A.R. 28-19-500 and in Oklahoma, the regulation is OAR 252-100-7. Within its definition of a major source in the above referenced regulations the state of New Mexico includes the following language:

> *…hazardous emissions from any oil or gas exploration or production well (with its associated equipment) and hazardous emissions from any pipeline compressor or pump station shall not be aggregated with hazardous emissions from other similar units, whether or not such units are in a contiguous area or under common control, to determine whether such units or stations are major sources…*

In other words, in determining a major source, each oil and gas exploration and production well must be considered singularly. Kansas, Texas and Oklahoma regulations include similar language.

The state of New Mexico incorporates federal NESHAPs for pollutants through updates to 20.2.78 NMAC, which adopts 40 CFR Part 61, and federal NESHAPs for source categories through updates to 20.2.82 NMAC, which adopts 40 CFR Part 63. Similarly, Texas incorporates federal NESHAPs for both 40 CFR 61 and 40 CFR 63 through updates to 30 TAC 113. Kansas incorporates federal NESHAPs by adopting 40 CFR 61 through updates to K.A.R. 28-19-735 and incorporates NESHAP source categories at 40 CFR 63 through updates to K.A.R. 28-19-750. Oklahoma incorporates both 40 CFR 61 and 40 CFR 63 through O.A.R. 252-100-41-2 and Appendix Q.

4.1 NATIONAL AIR TOXICS ASSESSMENT (NATA)

Every four years, the EPA's Office of Air Quality and Planning Standards produces a National Air Toxics Assessment (NATA). The most recent NATA for 2014 data was published August 2018. NATA is a first-pass, screening tool intended to evaluate the human-health risks posed by air toxics across the United States. Data is provided at the national, state, county, and census-tract level. NATA uses methods consistent with the general risk assessment framework used throughout EPA.

The NATA risk assessment uses emissions data compiled for a single year as inputs to air quality models, which incorporate meteorological data for the same year to estimate ambient air concentrations of certain air toxics. Modeled concentrations are then combined with census data and other information to calculate exposure concentrations of the air toxics. NATA then provides quantitative estimates of potential cancer risk and five classes of non-cancer hazards (grouped by organ/system: immunological, kidney, liver, neurological, and respiratory) associated with chronic inhalation exposure to real-world toxics.

NATA potential cancer risk values represent statistical probabilities of developing cancer over a lifetime. NATA non-cancer hazards are expressed as a ratio of an exposure concentration (EC) to a reference concentration (RfC) associated with observable adverse health effects (i.e., a hazard quotient). "For a given air toxic, exposures at or below the RfC (i.e., HQs are 1 or less) are *not* likely to be associated with adverse health effects. As exposures increase above the RfC (i.e., HQs are greater than 1), the potential for adverse effects also increases" (EPA 2017c).

NATA can answer many questions including the following:

- Which air toxics pose the greatest potential risk of cancer or adverse non-cancer effects across the entire United States?
- Which air toxics pose the greatest potential risk of cancer or adverse non-cancer effects in certain areas of the United States?
- Which air toxics pose less, but still significant, potential risk of cancer or adverse non-cancer effects across the entire United States?
- When risks from long-term inhalation exposures to all outdoor air toxics are considered together, how many people could experience a lifetime cancer risk greater than levels of concern (e.g., 1-in-1 million or 100-in-1 million)?
- When considering potential adverse non-cancer effects from long-term exposures to all outdoor air toxics together for a given target organ or system, how many people could experience

exposures that exceed the reference levels intended to protect against those effects (i.e., a hazard quotient greater than 1) (EPA 2017c).

You can use NATA as a tool to identify places of interest for further study, to get a starting point for local assessments, and to inform monitoring programs. For example, communities use NATA to find out what data and research is needed to better assess their local risk from air toxics. Communities have found that using NATA helps inform and empower citizens to make local decisions about their community's health.

It is important to note that NATA focuses solely on exposures from inhalation of outdoor ambient air. The NATA framework does not address inhalation from indoor ambient air, estimate human exposure to chemicals via ingestion or through dermal contact, or account for exposures that may take place via other mechanisms. In addition, owing to the nature of the models used, the NATA Technical Support document highlights that NATA results should not be used:

- as a definitive means to pinpoint specific risk values within a census tract;
- to characterize or compare risks at local levels (such as between neighborhoods);
- to characterize or compare risks between states;
- to examine trends between or otherwise compare NATAs;
- as the sole basis for developing risk reduction plans or regulations;
- as the sole basis for determining appropriate controls on specific sources or air toxics; or
- as the sole basis to quantify benefits of reduced air toxic emissions (EPA 2017c).

In addition, although NATA reports results at the census tract level, average risk estimates are far more uncertain at this level of spatial resolution than at the county or state level. To analyze air toxics in smaller areas, such as census blocks or in suspected "hotspots," other tools such as site-specific monitoring and local-scale assessments should be used (EPA 2017c). NATA results are best used to focus on patterns and ranges of risks across the country.

For the purposes of NEPA disclosure, project level implementation and mitigation thresholds, the BLM assesses an upper limit of a one per million cancer risk for lifetime exposure (chronic) level. Chronic indicators, known as Reference Concentrations (RfC) are defined by EPA as the daily inhalation concentrations at which no long-term adverse health impacts are expected. Short-term (1-hour) HAPs concentrations will be compared to acute Reference Exposure Levels (RELs). RELs are defined as concentrations at or below which no adverse health effects are expected. No RELs are available for ethylbenzene and n-hexane; instead, the available Immediately Dangerous to Life or Health divided by 10 (IDLH/10) values are used. The National Institute for Occupational Safety and Health (NIOSH) determines these IDLH values which are approximately comparable to mild effects levels for 1-hour exposures. The primary air toxics of concern for oil and gas operations are the BTEX compounds (benzene, toluene, ethylbenzene, and xylene), formaldehyde, and n-hexane.

Table 4. NATA data for the United States, New Mexico and Seven (7) Counties in New Mexico

Location	Population	Total Cancer Risk (per million)	Total Hazard Quotients				
			Immunological	Kidney	Liver	Neurological	Respiratory
United States	312,572,412	31.6890	0.0248	0.0107	0.0149	0.0419	0.4366
New Mexico	2,059,163	24.2145	0.0108	0.0047	0.0088	0.0254	0.3162
Chaves Co.	65,645	**25.8797**	0.0094	0.0017	0.0070	**0.0260**	**0.3392**
Eddy Co.	53,828	**27.9988**	**0.0117**	0.0016	0.0069	0.0214	**0.3479**
Lea Co.	64,727	**24.6598**	**0.0122**	0.0017	0.0071	0.0193	0.2993
McKinley Co.	71,492	15.9305	0.0036	0.0008	0.0056	0.0190	0.2048
Rio Arriba Co.	40,246	16.5184	0.0039	0.0005	0.0056	0.0193	0.2002
Sandoval Co.	131,561	23.0073	**0.0114**	**0.0053**	**0.0094**	**0.0259**	0.2999
San Juan Co.	130,044	22.5893	0.0081	0.0020	0.0072	**0.0264**	**0.3714**

Source: (EPA 2017c)
Seven counties in table are: Chaves, Eddy, Lea, McKinley, Rio Arriba, Sandoval, and San Juan counties), where parcels are regularly nominated for BLM NM Quarterly Oil and Gas Lease Sales.
Data for the United States, New Mexico, and seven (7) counties in New Mexico. Total cancer risks and five total hazard quotients (immunological, kidney, liver, neurological, and respiratory) values are reported. Total Cancer Risk and Hazard Quotients at the county level in **bold** are those that are greater than the values for the State of New Mexico.

Total cancer risk for the State of New Mexico (24.21) was less than the United States (31.69) (Table 4). In addition, all five (5) non-cancer hazard quotient values were consistently lower in the State of New Mexico than the national values (immunological: 0.01; kidney: 0.005 ; liver: 0.009; neurological: 0.03; and respiratory: 0.32) than the United States (immunological: 0.02, kidney: 0.01; liver:0.01; neurological: 0.04; and respiratory: 0.44).

At the county level, all seven (7) counties (Chaves, Eddy, Lea, McKinley, Rio Arriba, Sandoval, and San Juan) had cancer risk values and total hazard quotients less than the United States, with all total hazard quotients reported being less than one (<1.0). (*However, one census tract in San Juan County, tract 35045000609, located SSW of Aztec, NM, although still less than one, <1.0, was greater than the United States total respiratory hazard quotient).

Detailed county and census-tract level results are reported in Appendix B, grouped according to BLM District Office/Field Office boundaries - with Pecos District counties (Chaves, Eddy, and Lea) grouped together, and Rio Puerco Field Office and Farmington Field Office counties (McKinley, Rio Arriba, Sandoval, and San Juan) grouped together.

4.2 HYDROGEN SULFIDE (H_2S)

H_2S is a colorless flammable gas with a rotten egg smell which is a naturally occurring byproduct of oil and gas development in some areas, including the New Mexico portion of the Permian Basin. Hydrogen sulfide is both an irritant and a chemical asphyxiant with effects on both oxygen utilization and the central nervous system. Its health effects can vary depending on the level and duration of exposure.

Effects may range from eye, nose and throat irritation to dizziness, headaches and nausea. High concentrations can cause shock, convulsions, inability to breathe, extremely rapid unconsciousness, coma and death. Effects can occur within a few breaths, and possibly a single breath.

H_2S was originally included in the list of Toxic Air Pollutants defined by Congress in the 1990 amendments to the Clean Air Act. It was later determined that H_2S was included through a clerical error and it was removed by Congress from the list. H_2S was addressed under the accidental release provisions of the Clean Air Act. Congress also tasked EPA with assessing the hazards to public health and the environment from H_2S emissions associated with oil and gas extraction. That report was published in October 1993 (EPA 1993).

EPA found that while there was a potential for human and environmental exposure from routine emissions of H_2S from oil and gas wells, there was insufficient evidence to suggest that these exposures were a significant threat. H_2S is present in some oil and gas production zones. Flaring is used to reduce the H_2S emissions and the CFO has developed a series of standard conditions of approval for high H_2S areas in order to mitigate the risk of H_2S exposure (Lusk 2010).

Hydrogen Sulfide was added to the Emergency Planning and Community Right-to-Know Act list of toxic chemicals in 1993. In 1994, EPA issued an administrative stay of reporting requirements for H_2S while further analysis was conducted. The administrative stay was lifted recently, and TRI reporting due in July 2013 for calendar year 2012 emissions required reporting of H_2S.

While there are no national ambient air quality standards for H_2S, a number of states, especially those with significant oil and gas production, have set standards at the state level. Table 2 summarizes these standards for states under BLM New Mexico State Office jurisdiction.

Table 5. State Ambient Air Quality Standards for H2S

State	Standard	Averaging time	Remarks
Kansas	None		
Oklahoma	200 ppb* (0.2 ppm)	24 hr	
New Mexico	0.010 ppm** (10 ppb)	1 hr[1]	Statewide except Pecos-Permian Basin Intrastate Air Quality Control Region***
	0.100 ppm	½ hr[2]	Pecos-Permian Basin Intrastate Air Quality Control Region

	(100 ppb)		
	0.030ppm (30 ppb)	½ hr	Within municipal boundaries and within five miles of municipalities with population >20,000 in Pecos-Permian Basin AQ Control Region
Texas	0.08ppm (80 ppb)	½ hr	If downwind concentration affects a property used for residential business or commercial purposes
	0.12 ppm (120 ppb)	½ hr	If downwind concentration affects only property not normally occupied by people

Source (Skrtic 2006) *parts per billion **parts per million *** The Pecos-Permian Basin Intrastate Air Quality Control Region is composed of Quay, Curry, De Baca, Roosevelt, Chaves, Lea, and Eddy Counties in New Mexico.

1 Pecos-Permian basin intrastate air quality control region has a ½ hour standard of 0.10 ppm.

2 Not to be exceeded more than once per year.

The New Mexico Environment Department (NMED) has no routine monitors for H_2S. However, a one-time study done in 2002 (Skrtic 2006). sheds some light on the levels which can be expected near oil and gas facilities. These readings are averaged over 3-minute periods so are not comparable with the standard which has longer averaging periods. The monitoring data is presented in Table 3.

Table 6. Summary of Monitoring Data From New Mexico Study

Facility type	H_2S concentration measured at monitoring site (ppb)	
	Range	Average
Indian Basin Hilltop, no facility	5 – 8	7
Indian Basin Compressor Station	3 – 9	6
Indian Basin Active Well Drilling Site	7 – 190	114
Indian Basin Flaring, Production, and Tank Storage Site	4 – 1,200	203
Marathon Indian Basin Refining and Tank Storage Site	2 – 370	16
Carlsbad City Limits, near 8 to 10 wells and tank storage sites	5 –7	6
Carlsbad City Limits, Tracy-A	5 – 8	7
Compressor station, dehydrators – Location A	4 –5	4
Compressor station, dehydrators – Location B	2 – 15,000	1372
Huber Flare/Dehydrating Facility	4 – 12	77
Snyder Oil Well Field	2 – 5	4
Empire Abo Gas Processing Plant	1 – 1,600	300
Navajo Oil Refinery	3 – 14	7 - 8

Source: Skrtic 2006

In Oklahoma, routine monitoring downwind of two refineries in Tulsa showed H_2S levels that were within state standards but above normal background levels. In Texas, which has 12 routine monitors, H_2S levels generally ranged from 0.1 to 5 ppb. One monitor at a compressor station, however, showed frequent levels in excess of the state standard of 0.8 ppm (Skrtic 2006).

5 METHODOLOGY AND ASSUMPTIONS FOR ANALYSIS OF AIR RESOURCES

Air resource impacts can be analyzed on a number of different levels. First and most basic is to compare monitored pollutant levels with National Ambient Air Quality Standards. This generally applies only to criteria pollutants and provides a basis for determining whether the emissions of any specific pollutant are significant in a local area. Secondly, and necessary before further analysis can be done is an estimate of actual emissions, or an emissions inventory. This may be done for all emissions in a geographic area and for a project to provide a comparison. The EPA completes a National Emissions Inventory (see Section 3.1) at the county level every three years which provides a baseline for determining whether project emissions will cause a substantial increase in emissions or materially contribute to potential adverse cumulative air quality impacts. Finally, if impacts are anticipated to be significant, it may be necessary to apply air quality modeling to analyze the extent and geographic distribution of impacts.

Traditional air quality modeling generally falls into three categories. 1) Near-field dispersion modeling is applied to criteria pollutants, HAPs and AQRVs where a small to medium number of sources are involved to cover an area within 50km of a proposed project. 2) Far-field or transport modeling is used to provide regional assessments of cumulative and incremental impacts at distances greater than 50km. 3) Photochemical modeling is necessary for large scale projects with a large number of sources or with complex issues including ozone and secondary particulate impacts. An Air Quality Memorandum of Understanding (MOU) signed by the Department of Agriculture, Department of the Interior, and Environmental Protection Agency contains an Appendix which describes the air quality models available and their advantages, disadvantages and applications. The MOU and Appendix are included as Appendix E of this document. As of July 25, 2019 the Air Quality MOU was terminated (See Appendix E). We retain information related to the Air Quality MOU for historical purposes.

5.1 EMISSION INVENTORIES, STUDIES AND MODELING

An emissions inventory is a database that lists, by source, the amount of air pollutants discharged into the atmosphere during a year or other time period. Governments use emission inventories to help determine significant sources of air pollutants and to target regulatory actions. Emissions inventories are an essential input to mathematical models that estimate air quality. The effect on air quality of potential regulatory actions can be predicted by applying estimated emissions reductions to emissions inventory data in air quality models.

Emission trends over time can be established with periodic updates of the emissions inventory. Inventories also can be used to raise public awareness regarding sources of pollution. An emissions

inventory includes estimates of the emissions from various pollution sources in a geographical area. It should include all pollutants associated with the air quality problems in the area. For example, an emissions inventory to support the management of ground-level ozone should include sources of NOx and VOCs (EPA 2018b). Emission inventories are performed to determine the current state of the atmosphere, contribute to determining a future state of the atmosphere, aid decision makers in policy and regulatory guidance, and determine emission controls. The most recent emission inventory relative to BLM New Mexico operations was performed in 2017 for base year 2014. Other emission inventories, studies and modeling years include 2005, 2007, 2009 and 2013.

2014 Emissions Inventory

The Western States Air Resources Council -Western Air Regional Partnership (WESTAR-WRAP) conducted an oil and gas emissions inventory report for base year 2014 to further clarify the contributions of oil and gas activities to human-caused emissions within the Permian and San Juan Basins (Ramboll Environ 2017). The inventory included the counties of Chaves, Eddy, Lea and Roosevelt for the Permian Basin. The inventory included data from not only the New Mexico counties of McKinley, Rio Arriba, Sandoval and San Juan and Valencia but Archeleta and LaPlata Colorado. For purposes of our analysis, we only bring forth emissions from Rio Arriba, San Juan, McKinley and Sandoval counties for reporting and comparison in Table 7.

The results indicate there are non-point sources, including fugitive components, pneumatic devices, pumps, and well blowdown events that may not be reported through the state and federal inventories. These nonpoint sources could represent greater criteria, HAPs, and GHG emissions within these basins, in particular VOC and NOx emissions that contribute to ozone formation. It is therefore believed that the National Emissions Inventory (NEI) data related to Petroleum and Related Industries is underreported in terms of VOC and NOx emissions. Table 7 provides a comparison of 2014 NEI and WESTAR-WRAP datasets. As shown in the table, a comparison of datasets indicates that oil and gas development-related NOx and VOC emissions may be underreported by approximately 58 and 7 percent, respectively for the counties of Chaves, Eddy, Lea and Roosevelt.

Table 7. NEI Human-Caused Emissions Compared to WESTAR-WRAP 2017 Inventory (2014 Data)

County (Chavez, Eddy, Lea and Roosevelt)	**NOX**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
2014 NEI – All sources	29,482	50,227	115,793	42,085	6,021	1,886
2014 NEI – Petroleum and Related Industries	12,261	–	107,705	–	–	–
WESTAR-WRAP 2014 Oil and Gas Sources	30,351	–	121,644	–	–	–
County (San Juan, Rio Arriba, McKinley, Sandoval)	**NOX**	**CO**	**VOC**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
2014 NEI–all sources	70,255	166,934	93,763	118,725	18,899	6,602
2014 NEI–petroleum and related industries	25,011	–	66,385	–	–	–
WESTAR-WRAP 2014 Oil and Gas Sources	44,433		86,173	–	–	–

Sources: (EPA 2014e); (Ramboll Environ 2017).

Notes: Values include Tier 1 summaries for each county, including combustion, industrial, on-road/nonroad, and miscellaneous sectors. Biogenic sources are not included.

-Only precursor pollutants to ozone formation compared in this analysis (NOx and VOC).

In the NM Permian Basin, non-point and point sources of oil and gas are shown to contribute 11,790 and 18,561 tons per year respectively of the 30,351 total tons per year of man-made NOx emissions. The inventory revealed that the major oil and gas sources (point and non-point sources) of NOx emissions are attributed to: Point Source Compressor Engines 33%, Midstream Unclassified Sources 29%, Drill rigs 16%, artificial lifts 13%, Fracing 4%, non-point heaters 3% as well as other sources totaling approximately 2% of non-point and point emission sources.

In the NM Permian Basin, non-point and point sources of oil and gas are shown to contribute 110,480 and 11,164 tons per year respectively of the 121,644 total tons per year of man-made VOC emissions. The inventory revealed that the major oil and gas sources of VOCs emissions are attributed to: Oil Tanks 58%, Midstream Unclassified Sources 7%, Venting-blowdowns 7%, pneumatic devices 7%, oil well truck loading 6% as well as other sources representing approximately 15% of non-point and point VOC emission sources.

In the NM San Juan Basin, non-point sources of oil, gas and CBM wells are shown to contribute 33,435 tons per year of the 44,433 total tons per year of man-made NOx emissions. These major categories of non-point NOx emissions are attributed to: nonpoint compressor engines 88%, water pump engines 6.9%, non-point heaters 2.4%, artificial lift devices 1.9%, as well as other sources representing approximately 0.8% of non-point NOx emission sources.

In the NM San Juan Basin, non-point sources of oil, gas and CBM wells are shown to contribute 79,363 tons per year of the 86,173 total tons per year of man-made VOC emissions. These major categories of non-point VOCs emissions are attributed to: pneumatic devices 32%, non-point compressor engines 18.5%, non-point fugitives 14.8%, pneumatic pumps 12.7%, dehydrators 9.7% as well as other sources representing approximately 12.3% of non-point VOC emission sources (Ramboll Environ 2017).

2008 Ozone Study

In 2013, the Western Regional Air Partnership (WRAP) completed a regional technical analysis for ozone (WestJump) that includes information about ozone impacts and sources that contribute to the formation of ozone for calendar year 2008. The analysis demonstrated that the largest contributor to ozone concentrations in the western U.S. was international transport and stratospheric ozone. State-to-state ozone transport was important, as well. For example, New Mexico sources significantly contribute to elevated ozone concentrations in Texas, Arizona and Colorado. Texas is a significant contributor to elevated ozone in Oklahoma, Louisiana, New Mexico, Missouri and Arizona. Kansas sources significantly contribute to elevated ozone in Missouri and Texas, while Oklahoma sources significantly contribute to elevated ozone in Missouri, Texas and New Mexico (ENVIRON International Corporation, Alpine Geophysics, LLC and University of North Carolina 2013).

The WestJump analysis also provides information about $PM_{2.5}$ impacts and contributing sources for calendar year 2008. Interstate transport is significant for $PM_{2.5}$. New Mexico significantly contributes to annual $PM_{2.5}$ exceedances in Arizona; Texas significantly contributes to exceedances in Arkansas,

Missouri, Mississippi, Illinois and Alabama; Oklahoma significantly contributes to exceedances in Arkansas and Missouri, and Kansas significantly contributes to exceedances in Iowa, Missouri, Illinois, Arkansas and Wisconsin. For the 24-hour $PM_{2.5}$ standard, New Mexico significantly contributes to exceedances in California, Texas and Oklahoma significantly contribute to exceedances in Iowa, and Kansas significantly contributes to exceedances in Iowa and Wisconsin (ENVIRON International Corporation, Alpine Geophysics, LLC and University of North Carolina 2013).

2007 Emissions Inventory

An emissions inventory conducted for the Carlsbad Field Office for calendar year 2007 and including Chaves, Lea, and Eddy counties (Applied Enviro Solutions 2011) shows that VOC emissions from biogenic (natural) sources are far greater than those from anthropogenic (human) sources and account for 91% of VOCs inventoried. Point source emissions (which might include such industrial sources as power plants, gas plants and oil refineries) account for 40% of anthropogenic VOC emissions in the area, solvent use accounts for 15%, and fire (including wildland, structure, and open burning) accounts for 8%. Oil and gas area sources produce only 1.4% of VOCs in the area while pipeline transport of oil and gas accounts for 1.7%.

The 2007 emissions inventory for Chaves, Eddy, and Lea Counties shows that anthropogenic sources account for 65% of CO emissions and biogenic sources 35%. Of the anthropogenic emissions 47% are from on road mobile sources, 24% from industrial point sources, 14% from non-road mobile sources, 9% from fire, and 2% each from oil and gas area sources and waste disposal burning (Applied Enviro Solutions 2011) NO_x emissions in the Carlsbad area are largely anthropogenic (88%). Of the total human-caused NOx emissions, industrial point sources account for 84%, on-road mobile sources account for 7%, oil and gas area sources account for 5%, non-road mobile sources account for 2%, and residential heating with natural gas and propane account for 1% (Applied Enviro Solutions 2011).

A 2007 emissions inventory for Chaves, Eddy, and Lea Counties shows that the bulk of emission for both PM10 and PM2.5 are from dust from unpaved roads (88 and 65% respectively). For PM10, the next three highest categories are point sources at 2.8%, tilling and harvesting 2.6% and paved roads 2.4%. Oil and gas area sources account for only 0.1% of PM10 emissions. For PM2.5, the next three highest categories are point sources at 17%, fire at 4.3% and tilling and harvesting at 2.8%. Oil and gas area sources account for 0.8% of PM2.5 emissions in this area (Applied Enviro Solutions 2011).

The Carlsbad area, the 2007 emissions inventory does not differentiate SO_2 from SO_x but it can be assumed that the percentage of emissions by category is similar. In this region, oil and gas area sources account for 74% of all SO_x emissions with most of the remainder, 25% accounted for by industrial point (Applied Enviro Solutions 2011).

2005 Emissions Inventory

An emissions inventory conducted for the Four Corners region for calendar year 2005, including counties in northwestern New Mexico, southwestern Colorado, southeastern Utah and northeastern Arizona,

estimates VOC emissions from biogenic sources account for 55% of total VOCs (Environ 2009). In this study, biogenic VOC emissions were calculated not measured. Oil and gas area and point sources accounted for 28% of VOCs inventoried.

The top three sources of NO_x emissions in the Farmington area in 2005 were electricity generation (72,668 tons; 33%), oil and gas (68,830 tons; 31%) and on-road mobile sources (39,340 tons; 18%) (Environ 2009).

2005 Four Corners Air Quality Task Force (FCAQTF) Photochemical Modeling

In 2009, a photochemical modeling analysis was completed for the Four Corners Air Quality Task Force (FCAQTF). Potential ozone impacts and the usefulness of certain mitigation measures were analyzed. This modeling showed that the Four Corners region would continue to meet the current ozone standard in 2018 with continued oil and gas development and population growth. The analysis showed that emissions reductions would be required for both power plants and oil and gas sources in order to achieve measurable reductions in ozone concentrations. The best achievable ozone reductions from the modeling scenarios implementing control measures to reduce emissions were on the order of 5 (Environ 2009).

The modeling analysis completed for FCAQTF also used source apportionment modeling, which indicated that, in general, transport from outside the region and naturally occurring VOCs from vegetation were large contributors to 2005 ozone levels. However, it was also shown that on days with high ozone concentrations, oil and gas sources and electricity generation units (EGUs) both contributed significantly to the total modeled ozone concentrations.

5.2 PECOS DISTRICT OFFICE (PDO) ATMOSPHERIC AND PHOTOCHEMICAL GRID MODELING

An Air Resources Technical Support Document (ARTSD) URS Group Inc. (URS) 2013 was prepared to report the potential air quality impacts resulting from the RFD scenario. This effort included atmospheric dispersion and photochemical grid modeling to predict concentrations of specific pollutants in and around the CFO (in which most of the Pecos District oil and gas activity occurs). The results of ARTSD analysis indicate that air quality impacts from the RFD scenario, while noticeable, are generally acceptable. Most predicted criteria pollutant concentrations are well below the NAAQS throughout the extensive modeling domains included in this analysis. While no exceedances of NAAQS were predicted from the modeling of federal wells associated with the RFD scenario (6,400 wells), consideration of the entire RFD scenario (16,000 wells) and other reasonably foreseeable future actions (i.e., cumulative impacts) in the ARTSD included predictions of pollutant concentrations approaching or exceeding the NAAQS (for ozone, $PM_{2.5}$ and potentially SO_2) and indicate the need for additional ambient monitoring data, refined modeling, and consideration of additional mitigation measures. Most of the areas where NAAQS would be exceeded are out of the CFO region (URS Group Inc. (URS) 2013)

5.3 AIR QUALITY MODELING FOR TEXAS

Numerous reports on air quality modeling projects done by and for the TCEQ, including modeling done for the Dallas and Houston non-attainment areas can be accessed on the Air Division website (TCEQ 2019b). The TCEQ has convened advisory groups in southeastern Texas and Dallas-Fort Worth to assist the agency in addressing photochemical modeling issues.

6 CALCULATORS OIL AND GAS DEVELOPMENT

Emissions calculators were developed by air quality specialists at the BLM National Operations Center in Denver, Colorado. The calculators use an Excel spreadsheet for computation and are based on emissions factors from EPA and the American Petroleum Institute (API). The calculators were quality assured and improved by the URS Corporation under contract with the BLM. Methodology for computing greenhouse gases is documented in ***The Climate Change Supplementary Information Report for the Montana, North Dakota and South Dakota Bureau of Land Management*** (URS Corporation (2010). More recently, Kleinfelder West, Inc. developed a calculator for a representative oil and gas well in the western United States (Kleinfelder West, Inc. 2013). Other air pollutant computations have not yet been described in a published document but are based on methods recommended in the EPA publication AP-42 *Compilation of Air Pollutant Emissions Factors* (EPA 1995 & EPA 2006).

The calculators account for a number of variables, including access and construction requirements, equipment and other infrastructure needs, and expected production volumes. Because the algorithms used by the calculators to quantify emissions are based on averages and numerous assumptions must be made about construction, the calculators provide an approximation of emissions levels. Actual project emissions may be greater or less than those projected by the calculators. Emissions for oil and gas development assume that wells will be hydraulically fractured; if a well is not fractured, emissions will be less than calculated.

The BLM in NM has modified the calculators and assumptions for use in analyzing a single well and to more closely represent oil and gas wells in the state of New Mexico; specifically, the San Juan and Permian Basins. However, it must be understood that the calculators were originally designed to make estimations of emissions at the RMP level which would result in some averaging and smoothing of assumptions. At the single well level, the uncertainty in emissions projections increases substantially.

The BLM has determined that well production typically declines over time and has assumed that declining production would result in reduced emissions over time. A production history may vary from a straight line to a hyperbolic curve. The object of decline curve analysis is to model the production history. Assuming a certain abandonment pressure or gas rate, the decline curve is used to determine the productive life of the well. Well life can vary from a few years to many decades depending on the reservoir and the year it was drilled. Production is also dependent on the price of oil and gas. Since initial development in the San Juan Basin in the 1920s, all reservoirs have had significant reservoir pressure declines. Subsequent infill drilling will encounter reduced pressure reservoirs with limited well life spans compared to wells drilled earlier in the development of the field.

It should be noted that the calculations are based on recently drilled wells and tend to overestimate the average emissions over the lifetime of the well. It is not possible to estimate the lifespan of an individual well, nor is the calculator able to incorporate the decline curve into results, so we have computed one-time (construction, completion, workover and reclamation) emissions and annual (operations and maintenance) emissions. However, the annual emissions do not take into account the declining production rates over the lifetime of the well.

6.1 ASSUMPTIONS

As mentioned above, the calculators account for a number of variables or inputs that are used to calculate the overall emissions of the different stages of oil and gas development. At the time of an Application for Permit to Drill, not all of these variables may be known. In order to populate the calculators with the different variables, the BLM Carlsbad Field Office (CFO) and the Farmington Field Office (FFO) each developed a set of assumptions pertaining to development in their respective areas. These assumptions address variables such as well depth, production, road development/maintenance, travel to and from well sites, construction times, and need for workovers. The following sections summarize the assumptions made for each field office area in order to populate the calculators.

6.1.1 ASSUMPTIONS - FARMINGTON FIELD OFFICE

There are several geologic formations within the FFO boundary that are known to produce natural gas. The Fruitland is the shallowest routinely produced formation at approximately 2,000 ft. deep. The Dakota is the deepest formation routinely produced at approximately 6,000 ft. deep. The Mancos Shale formation is approximately 2,500 feet deep. Several formations produce various amounts of water during the production phase of the well. The preferred method of disposing of the produced water is via an injection well drilled into the geologically isolated Entrada formation, which is approximately 7,500 ft. deep. Although wells are not drilled to these precise depths, these generalized depths were used for the purpose of estimation in the emissions calculator.

Between 2015 and 2030, it is estimated that most of the oil and gas drilling in FFO will be within the Mancos Shale formation. The formation is thought to contain gas on the northern end (southern Colorado and northwestern New Mexico) and oil on the southern end (towards Gallup and Grants, NM). Due to unfavorable natural gas prices in the near-term, no gas well development in the Mancos Shale formation is expected until at least 2019. Starting in 2019, it is estimated that approximately 100-200 gas wells could be drilled per year. It is likely that central collection and shipping facilities for oil will be developed, too. Oil well development in the Mancos Shale formation is expected to proceed at 100-200 wells per year, although little development is currently occurring due to unfavorable oil prices. Recent oil well drilling has used horizontal rather than vertical wells.

BLM specialists and engineers were consulted to develop a range of values to insert into the calculator to estimate the emissions from construction, completion, interim reclamation, annual operation, and final reclamation. Pad construction, interim reclamation, and final reclamation processes are generally

the same across the basin. The range of values was designed to address the requirements of about 95% of the wells developed in the San Juan Basin. Unforeseen or unpredictable events may cause approximately 5% of wells to fall outside of the range.

The calculator includes construction of a "frac pond", as future wells in the region will most likely be accomplished with hydraulic fracturing. The calculator has options for diesel-fired or natural gas-fired drill rigs. More commonly in 2014 in the region, drill rigs were diesel-fired. Many of the well pads have associated man camps where drilling personnel are housed during well drilling. Since most pads will now accommodate more than one well, the man camps allow employees to avoid commuting during the time the wells on the pad are drilled.

The ancillary activities associated with the production phase of a well such as workovers, road maintenance, and road traffic are somewhat difficult to predict. Calculations for Mancos Shale drilling recently have assumed one well workover per year. Existing gas wells in the FFO area do not require workover on a regular schedule. Three to six years between workovers is typical, and the nature of the work required during a workover is variable.

FFO and the oil and gas industry have established a road committee to identify collector roads (main travel corridors) and have established procedures to maintain collector roads as necessary. However, no regular maintenance schedule exists. Most new wells are drilled along existing resource roads that are not covered by the road committee and are maintained as needed. Although road maintenance within the FFO varies, a reasonable assumption is that the resource roads will be maintained once a year. The average length of new road required to drill a new well during the past two years has been 800 ft. Emissions are calculated based on this average assuming that an 800 ft. resource road is maintained once a year and the maintenance work would require about 6 hours of work.

The majority of producing wells in the San Juan Basin utilize remote telemetry powered by solar panels to transmit well production data to centralized office locations. While the frequency of well site visits is not predictable, the need for well site visits during the production phase of the well is greatly reduced by the telemetry systems. Typically, a field technician will drive a light truck and will visit multiple wells per trip along an established service route. To estimate the miles required for each site visit, an additional 4.5 miles of travel along an existing driving route was added to the typical 800 ft. of new road for a total of 5 miles. Emissions are calculated for weekly visits during the year for a light truck. For various servicing needs, heavy duty vehicles over 8,500 lbs. gross vehicle weight rating (EPA 2015c) are required on-site during drilling and workovers. Heavy duty vehicles typically do not visit multiple sites per day. Emissions are calculated for driving 50 miles round trip for five trips per year.

The average San Juan Basin gas well produces at a rate of 100 mcfd (thousand cubic feet per day). For analysis purposes, the initial production rate is assumed to be 100 mcfd. The volume of gas and oil is normally the greatest following the completion of the well. Oil and gas production rates decline as a function of time, reservoir pressure drop, or the changing relative volumes of the produced fluids.

The FFO RMP (U.S. Department of Interior, Bureau of Land Management 2003) addressed air quality based on the Air Quality Modeling Analysis Technical Report prepared by Science Applications International Corporation (SAIC 2003). The 2003 FFO RMP modeling is considered here because it was used to characterize air quality for the purpose of land use planning, and this environmental assessment tiers to the 2003 FFO RMP. The 2003 SAIC modeling was based on the highest level of oil and gas development proposed based on the RFD and identified a potential for exceeding the NAAQS for NO_2. The alternative selected for the RMP proposed a lower level of development than that modeled. Lower levels of development and NO_x limits placed on engines have resulted in lower impacts than were modeled.

6.1.2 ASSUMPTIONS – CARLSBAD FIELD OFFICE

The CFO area of responsibility contains 28 different geologic zones that produce oil, natural gas and water. The complex geology, variety of drilling techniques used (horizontal, vertical), uncertainty of production, and variation of the drilling time and equipment required makes it difficult to approximate the emissions for a proposed well. In order to provide a basis for extrapolation, the CFO selected a random sample of seventy wells out of a population of 1836 wells drilled within the last 4 years (2007-2010). These recently drilled wells were selected to incorporate the latest technology, the latest trends in oil and gas development, and the most recent production data. This sample of newer wells will overestimate average annual production (and therefore emissions) as production drops with the age of the well. The sample size was selected to ensure that it was representative of 95% of the recently drilled wells.

The 70 wells were reviewed to ensure accurate production data was available and to eliminate older wells that had been re-drilled into a new formation. Sixty-eight wells remained after the review. This was still a sufficient sample size to ensure statistical accuracy, so no additional wells were selected. The annual production values for oil, gas, and water, length of road constructed, well pad size and travel distances to reach the well from the nearest town were calculated for each well. The lowest, highest, and mean values were then calculated for each parameter and used to create three emissions scenarios (maximum, minimum, and average). These values represent the maximum, minimum and average emissions for 95% of the new wells in the CFO. Unforeseen or unpredictable events may cause 5% of wells to fall outside of the range. Because the minimum scenario has no production, it can be used to estimate the emissions from a salt-water disposal well.

Other values required for the calculator were conservatively estimated by BLM resource staff. It is not possible to predict the exact amount of time or equipment required for the development and operation of a well in the Permian Basin due to the varied geological formations, numerous operators and other variables. Therefore, BLM specialists and engineers were consulted to develop a range of values to insert into the calculator to estimate the emissions from construction, completion, interim reclamation, annual operation, and final reclamation. The range was designed to include the requirements of 95% of the wells that may be developed in the Permian Basin. Where no information was available, the default

values from the calculator were used. The calculator will be updated as additional information becomes available.

The ancillary activities associated with the production phase of a well such as workovers, road maintenance, and road traffic are difficult to predict. Oil and gas wells in the CFO do not require workover on a regular basis and when these activities occur, they generally are not reported to the BLM. Three to six years between workovers is routine, and the nature of the work required during a workover is variable. It is assumed that any gas released during the completion process will be flared. The calculator assumes 100 percent combustion efficiency.

The emissions calculator can be used to estimate PM as a result of construction and drilling activities related to pad building and road traffic. The amount of PM emissions depends on the length, surface condition; soil types traversed, and soil moisture conditions of the road to the site. Because site visit frequencies vary and are difficult to predict, varying numbers of site visits were input into the calculator, which had almost no impact on the total tons of PM emitted. Most gas wells in the Permian Basin utilize remote telemetry powered by solar panels to transmit well production data to centralized office locations. The need for well site visits during the production phase at these wells is greatly reduced. Oil wells require site visits, and the frequency of well visits is not predictable.

While the frequency of well site visits is not predictable, the need for well site visits during the production phase of the well is greatly reduced by the telemetry systems. Typically, a field technician will drive a light truck and will visit multiple wells per trip along an established service route. It was estimated that an average trip distance consists of two miles 3 times per week. This information is used in calculating the annual operation emissions. Heavy trucks are required on site less often than light trucks for various servicing needs. Heavy trucks typically do not visit multiple sites per day. Distances to the wells were determined from the statistical sample including the total distances traveled on dirt and paved roads to reach the well from the nearest town (Carlsbad, Artesia, Hobbs, etc.). Emissions include maintenance and inspection of the well. Reclamation of the well site and road will be conducted when the well has finished producing and is plugged and abandoned. Emissions from reclamation of the well pad and road are also estimated.

County roads in the CFO have established procedures for maintenance but no regular maintenance schedule exists. Most new wells are drilled along oil and gas lease roads that are only maintained by oil and gas operators as needed. Therefore, road maintenance within the CFO is not predictable. The average length of new road required to drill a new well during the past four years based on the random sample has been 570 ft. Emissions are calculated based on this average assuming that a 570 ft. resource road is maintained once a year.

Maximum, minimum and average emissions for construction, completion/recompletion, workover, annual operations, annual road maintenance, and reclamation have been calculated and are presented in project APD EAs. Note that these estimates are based on hypothetical scenarios and it is unlikely that the maximum emissions scenario would ever occur.

6.2 VOCS AND WELL DRILLING OPERATIONS

Specifically, VOCs are emitted during well drilling and operations as exhaust from internal combustion engines. VOCs may be emitted from hydraulically fractured oil and gas wells during the fracturing and re-fracturing of the wells. In the hydraulic fracturing process, a mixture of water, chemicals and proppant is pumped into a well at extremely high pressures to fracture rock and allow oil and gas to flow from the geological formation. During one stage of well completion, fracturing fluids, water and reservoir gas come to the surface at high velocity and volume (flowback). This flowback mixture contains VOCs, methane, benzene, ethylbenzene and n-hexane; some or all of the flowback mixture may be vented, flared or captured. The typical flowback process lasts from 3 to 10 days, so there is potential for significant VOC emissions from this stage of the well completion process. Most new oil and gas wells drilled today use the hydraulic fracturing process.

6.3 WELL COUNTS

The number of active wells can vary greatly from year-to-year as well counts are not static or logarithmic by nature. Well count data can be obtained from many sources such as state oil and gas commission databases, university and research databases, proprietary databases, as well as public federal databases. The sources reporting well counts may also differ in reporting methods. Reporting of well counts may include various types of wells such as active, new, temporarily abandoned, and inactive (shut in or temporarily abandoned). For the purposes of this report, the BLM uses the Petroleum Recovery Research Center, AFMSS and state oil and gas well count reporting.

There are currently approximately 16,139 oil and gas wells on federal mineral estate in the counties within FFO (San Juan, Rio Arriba, Sandoval, and McKinley) that are categorized as active, new or temporarily abandoned (Petroleum Recovery Research Center 2015). If oil and gas wells with private (fee), state-owned, or Indian mineral estate in these counties are included, there is a total of 23,034 active, producing, and inactive (shut in or temporarily abandoned) wells in the area. Table 12 shows the latest oil and gas production on federal leases by state and as a percentage of U.S. production.

There are currently approximately 17,735 oil and gas wells on federal mineral estate in the counties within CFO (Eddy, Lea and Chavez) that are categorized as active, new or temporarily abandoned (Petroleum Recovery Research Center 2015). If oil and gas wells with private (fee), state-owned, or Indian mineral estate in these counties are included, there are approximately 38,501 active, producing, and inactive (shut in or temporarily abandoned) wells in the area.

BLM's Automated Fluid Minerals Support System (AFMSS) provides information about federal mineral estate in Kansas, Oklahoma and Texas for fiscal year 2014 (BLM 2014). There were approximately 338 oil and gas wells on federal mineral estate and 75,328 total oil and gas wells in Kansas (calendar year 2017) (Kansas Geological Survey 2015); 406 oil and gas wells on federal mineral estate and 180,000 total oil and gas wells in Oklahoma (calendar year 2011) (Oklahoma Corporation Commissions 2011) there

were 485 oil and gas wells on federal mineral estate and 319,604 total active oil and gas wells in Texas (calendar year 2012 (Railroad Commission of Texas 2015)).

6.4 CALCULATOR SUMMARY

The calculators may be considered a type of model in that they use emissions factors, mathematical algorithms, and assumptions to arrive at some approximation of reality. However, their primary purpose is to compute an emissions inventory which is a necessary ingredient to any modeling effort.

7 AIR QUALITY RELATED VALUES (AQRVS)

Air Quality Related Values (AQRVs) are resources sensitive to air quality and can include a wide variety of atmospheric-chemistry related indicators. Monitoring and modeling of AQRVs help to provide a level of protection to sensitive areas such as Class I parks and wilderness areas. Such resources may include visibility or a specific scenic, cultural, physical, biological, ecological, or recreation resource identified for a particular area. Congress established certain national parks and wilderness areas as mandatory Class I areas where only a small amount of air quality degradation is allowed. Defined by the Clean Air Act, Class I areas include national parks greater than 6,000 acres, wilderness areas and national memorial parks greater than 5,000 acres, and international parks. These areas must have been in existence at the time the Clean Air Act was passed by Congress in August 1977.

The goal of Class I management is to protect natural conditions, rather than the conditions when first monitored. That is, if initial monitoring in a Class I area identifies human-caused changes, appropriate actions should be taken to remedy them to move toward a more natural condition. The goal of Class I management is to protect not only resources with immediate aesthetic appeal (i.e., sparkling clean streams) but also unseen ecological processes (such as natural biodiversity and gene pools U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service 2000, [FLAG] 2000). The Federal Land Managers' Air Quality Related Values Workgroup (FLAG) issued a revised Phase 1 report in 2010 (U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service 2010, [FLAG 2010). This report was developed as a tool to provide consistent approaches to the analysis of the effects of air pollution on AQRVs. The FLAG report focuses on three areas of potential impact: visibility, aquatic and terrestrial effects of wet and dry pollutant deposition, and terrestrial effects of ozone. This report is structured to address these same three areas of potential impact.

The BLM's goals include managing the jurisdictional field offices' activities and development to protect and improve air quality and, within the scope of the BLM's authority, minimize emissions that cause or contribute to violations of air quality standards or that negatively impact AQRVs (e.g., acid deposition, visibility).

7.1 VISIBILITY

Visibility is of greatest concern in Class I areas which are afforded the highest level of air quality protection by the Clean Air Act. Visibility impairment is a result of regional haze which is caused by the accumulation of pollutants from multiple sources in a region. Emissions from industrial and natural sources may undergo chemical changes in the atmosphere to form particles of a size which scatter or absorb light and result in reductions in visibility.

In 1985, the EPA initiated a network of monitoring stations to measure impacts to visibility in Class I Wilderness Areas. These monitors are known as the Interagency Monitoring for the Protection of Visual Environments (IMPROVE) monitors and exist in some, but not all, Class I wilderness areas. Table 8 shows the Class I areas in the BLM New Mexico State Office area of responsibility and whether they have an IMPROVE monitor and, if not, which monitor is considered representative for that area. There are no Class I areas in Kansas.

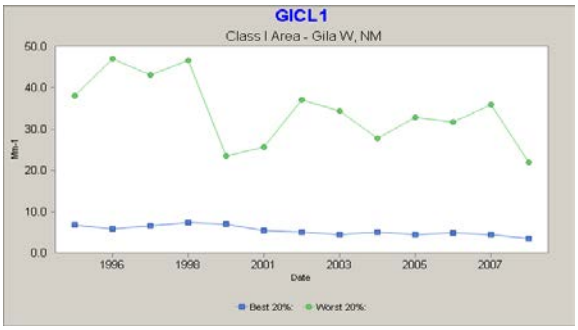
Table 8. Class I areas and IMPROVE monitors

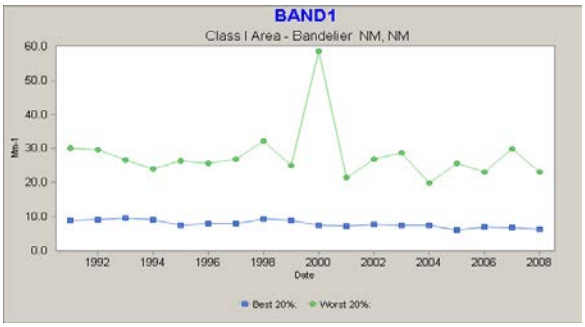
State	Class I Area	Agency	IMPROVE
New Mexico	Bandelier	National Park Service	Yes
	Bosque del Apache	Fish and Wildlife	Yes
	Carlsbad Caverns	National Park Service	Guadalupe Mtns
	Gila	Forest Service	Yes
	Pecos	Forest Service	Wheeler Peak
	Salt Creek	Fish and Wildlife	Yes
	San Pedro Parks	Forest Service	Yes
	Wheeler Peak	Forest Service	Yes
	White Mountain	Forest Service	Yes
Texas	Big Bend	National Park Service	Yes
	Guadalupe Mtns	National Park Service	Yes
Oklahoma	Wichita Mountains	Fish and Wildlife	Yes

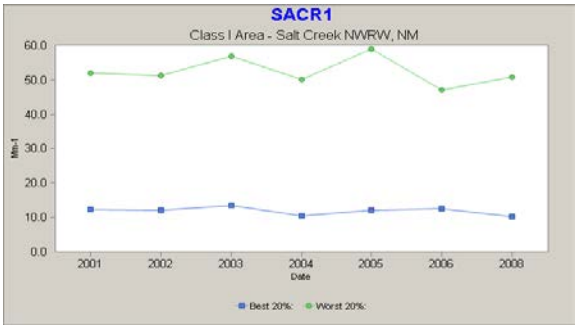
Figure 2 shows visibility extinction trends for each of the IMPROVE monitors in the BLM New Mexico State Office area of responsibility. The top line on each graph is for the 20% worst days and the bottom line is for the 20% best days. Note that peaks such as that seen for Bandelier National Monument in 2000 may be accounted for by the occurrence of large wildfires. A downward sloping line means less reduction of visibility and therefore an improvement. In most cases visibility trends have been flat or improving. Implementation of Best Available Retrofit Technology (BART) strategies as required under the federal Regional Haze Rule over the next few years should result in further improvements.

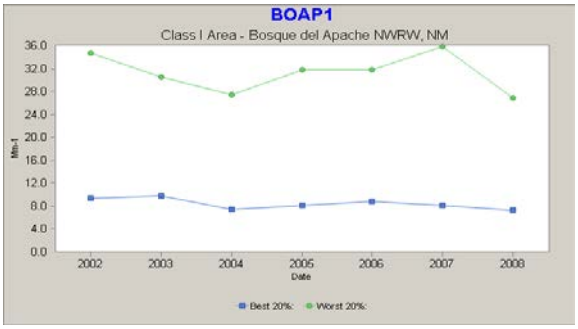
A qualitative discussion of visibility impacts from oil and gas development in the Farmington Resource Management Plan (RMP) concludes that for the scenario modeled, which projected greater development than has occurred; there could potentially be significant impacts to visibility at Mesa Verde National Park, a Class I area in southwest Colorado. Occasional impacts to San Pedro Parks (northern New Mexico) and Weminuche (southern Colorado) Wilderness areas were also thought possible.

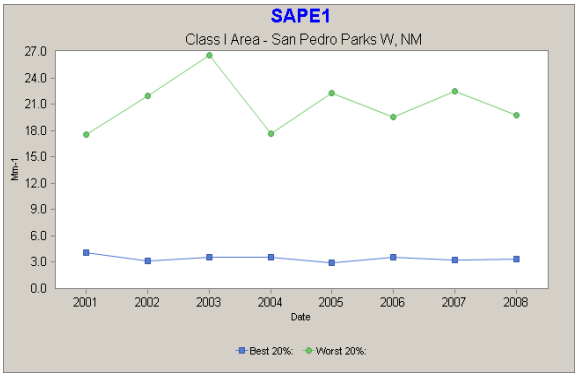
However, visibility trends shown below for San Pedro Parks, Mesa Verde, and Weminuche indicate that visibility on the best days has been flat to improving and visibility on worst days has shown little change over the period of record.

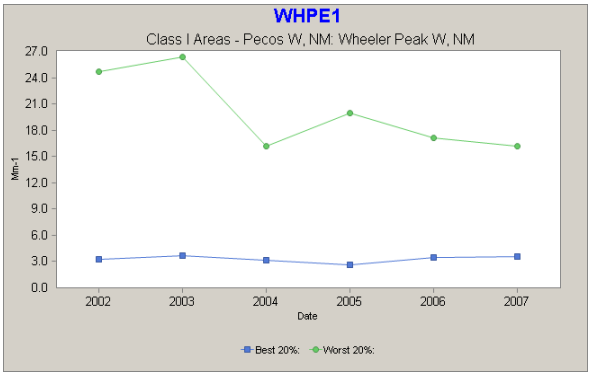


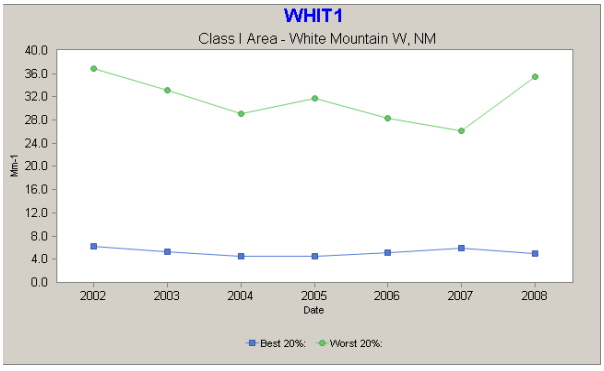


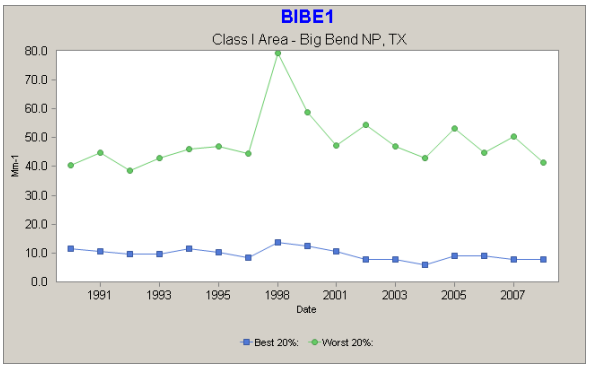












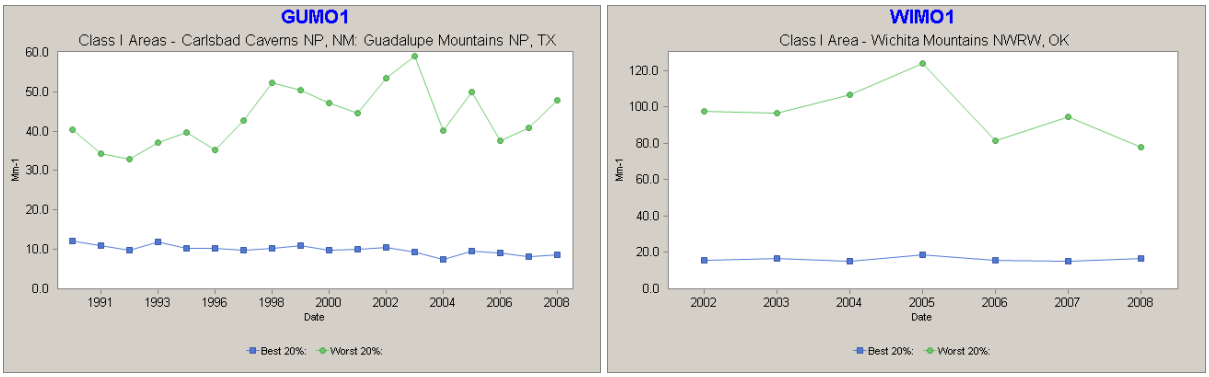


Figure 2. Visibility Extinction in Class I areas (Colorado State University 2014)

Trend lines for Class I areas affected by sources in Northwestern New Mexico (Figure 3) are similar to trend lines for Class I areas in New Mexico. While visibility on worst days at Guadalupe Mountains National Park may have diminished, a careful analysis of fire activity in the area would be necessary in order to draw conclusions about the cause of some peaks in recent years (Colorado State University 2014.

A recent study of Air Pollutant Emissions and Cumulative Air Impacts done for the Carlsbad Field Office indicates that pollutants contributing to reductions in visibility are largely coming from outside the region (Applied Enviro Solutions 2011).

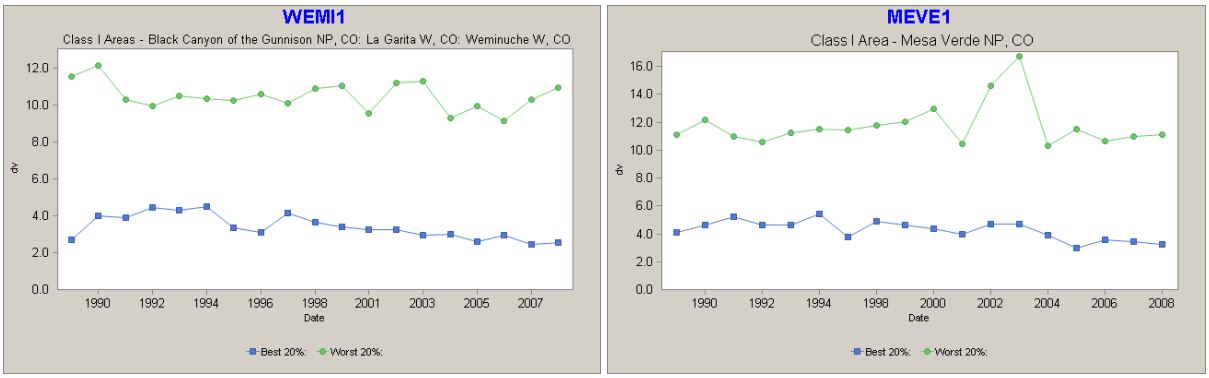


Figure 3. Visibility trends at Class I areas affected by sources in Northwestern New Mexico (Colorado State University 2014)

The WestJump analysis (ENVIRON International Corporation, Alpine Geophysics, LLC and University of North Carolina 2013) provides a wealth of information about visibility impairment at Class I areas and the source categories and states that contribute to impairment at each Class I area. There are two pie charts for each of the IMPROVE sites in New Mexico, Texas, Oklahoma and Kansas. These pie charts are presented in Appendix F. The first pie chart displays the contributions of the 17 western states by source category and species to visibility impairment for the IMPROVE site for the average of the worst 20% days. The second pie chart displays contributions by the 17 western states to visibility impairment for the IMPROVE site for the average of the worst 20% days. The pie chart data is from the CAMx 2006 36 km state-specific PM source apportionment modeling. The source category codes in the pie charts are:

- CON=controllable emissions (anthropogenic and Rx and Ag fires);
- NAT=natural emissions (biogenic, lightning, sea salt and windblown dust);
- WLF=wildfires.

The species codes in the pie charts are:

- PMC=Crustal
- PEC=elemental carbon
- PNO3=nitrate
- POM=organic PM
- PSO4=sulfate
- SSL=salt
- SSR=Rayleigh
- Soil=Soil

7.2 WET AND DRY POLLUTANT DEPOSITION

Deposition of pollutants through precipitation can result in acidification of water and soil resources in areas far removed from the source of the pollution, as well as causing harm to terrestrial and aquatic species. Some pollutants can also damage vegetation through direct or dry deposition. In general, the soils in New Mexico have a high acid neutralizing capacity and surface water is scarce, resulting in minimal impacts in this area. Also, the Acid Rain Program has resulted in greatly reduced levels of the most damaging pollutants. There are currently four wet deposition monitors in New Mexico including Gila Cliff Dwellings, Mayhill, Bandelier National Monument, and Capulin Volcano National Monument. In addition, monitors near the border at Mesa Verde and Guadalupe Mountains National Parks may shed some light on conditions in New Mexico. Data can be accessed through the National Atmospheric Deposition Network (NADP) at http://nadp.sws.uiuc.edu/NTN/ntnData.aspx. Wet deposition data is also available for monitoring sites in Kansas, Oklahoma, and Texas at this site.

The EPA has operated the Clean Air Status and Trends Network (CASTNET) since 1991 to provide data to assess trends in air quality, deposition and ecological effects due to changes in air emissions. Sites are located in areas where urban influences are minimal. There are currently no CASTNET observation sites in New Mexico but there are three in Texas and one each in Oklahoma and Kansas. There is a CASTNET site at Mesa Verde National Park in the Four Corners region. National maps of pollutant concentrations can be found at http://www.epa.gov/castnet/javaweb/airconc.html. These maps show that New Mexico and most of the western United States have much lower concentrations of all monitored pollutants than the eastern states and southern California. Nitrates are somewhat elevated in eastern Kansas and Eastern Oklahoma but this is likely associated with agricultural activities rather than oil and gas development. The maps also show that the trend over the past 20 years has been for decreases in all pollutants in most areas of the country. As an example, Figures 4 and 5 show particulate nitrate and sulfate levels for 1990 and 2014. Maps of wet deposition data from NADP monitors are also available from the National Atmospheric Deposition Program (National Atmospheric Deposition Program 2014). Total nitrogen deposition decreased by 44% from 1990 through 2014 in the eastern U.S. and decreased

by 27% in the western U.S. between 1996 through 2014; however, total nitrate concentrations measured at the eastern sites were generally two to three times higher than concentrations measured at western reference sites. Total dry and wet sulfur deposition decreased by 82% from 1990 through 2014 in the eastern U.S. and decreased by 50% from 1996 through 2014 in the west, over 3-year mean periods. These trends in deposition levels are discussed in depth in the CASTNET annual report (AMEC Environment and Infrastructure, Inc. 2014).

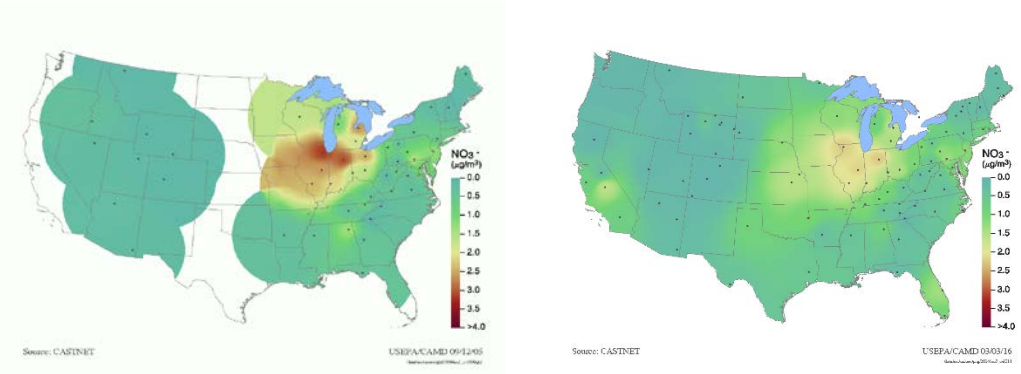


Figure 4. Particulate Nitrate 1990 (left) and 2014(right)

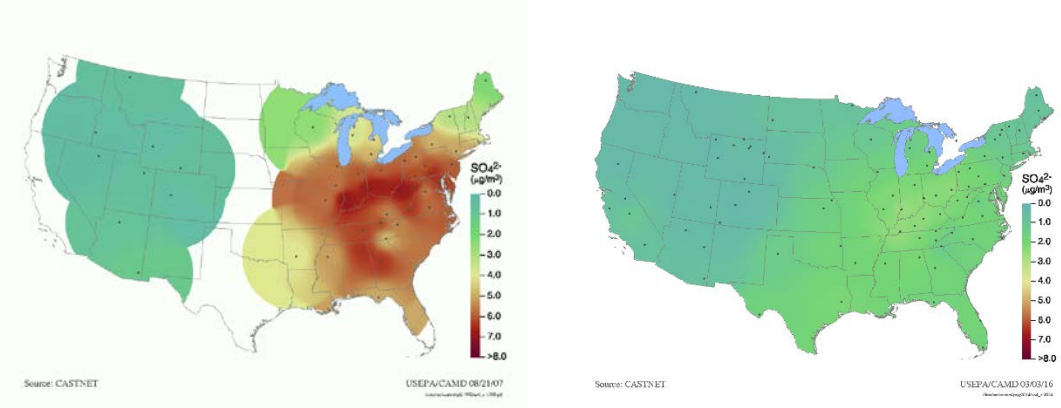


Figure 5. Particulate Sulfate 1990 (left) and 2014(right) (EPA 2015d)

The WestJump analysis (ENVIRON International Corporation, Alpine Geophysics, LLC and University of North Carolina 2013) provides information about contributing sources to wet and dry depostion at IMPROVE monitoring sites. Pie charts showing the species contributing to nitrogen and sulfur deposition at Class I areas in New Mexico, Texas, Oklahoma, Kansas, Colorado and Arizona are in Appendix G.

7.3 TERRESTRIAL EFFECTS OF OZONE

While other air pollutants may also negatively affect vegetation, ozone is recognized as the one most likely to cause damage. Visible damage to leaf cells may be present in the form of spots or dead areas,

though damage can be present long before it becomes visible. Decreased growth or altered carbon allocation may also occur. Ponderosa pine and aspen are species known to be sensitive to ozone in the atmosphere (U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service 2000)

An index has been developed to express cumulative seasonal impacts to vegetation. This is known as the W126 value. W126 is a cumulative metric that sums weighted hourly ozone concentrations during daylight hours in the summer ozone season. Figure 6 shows national W126 values for 2012 (AMEC Environment and Infrastructure, Inc. 2014). Higher W126 values were measured during 2012 in California, at high terrain sites in the west and at eastern sites with high daily 8-hour ozone concentrations. At high elevations, moderate ozone concentrations persist into the night due to lack of nighttime dry deposition and lack of fresh nitric oxide, both of which typically react with ozone at night to reduce ozone concentrations. The persistent, moderate ozone concentrations at high elevation sites result in higher W126 levels, indicative of steady ozone exposure for vegetation. In 2012, W126 values were higher than in 2011 because of higher ambient ozone concentrations measured in 2012.

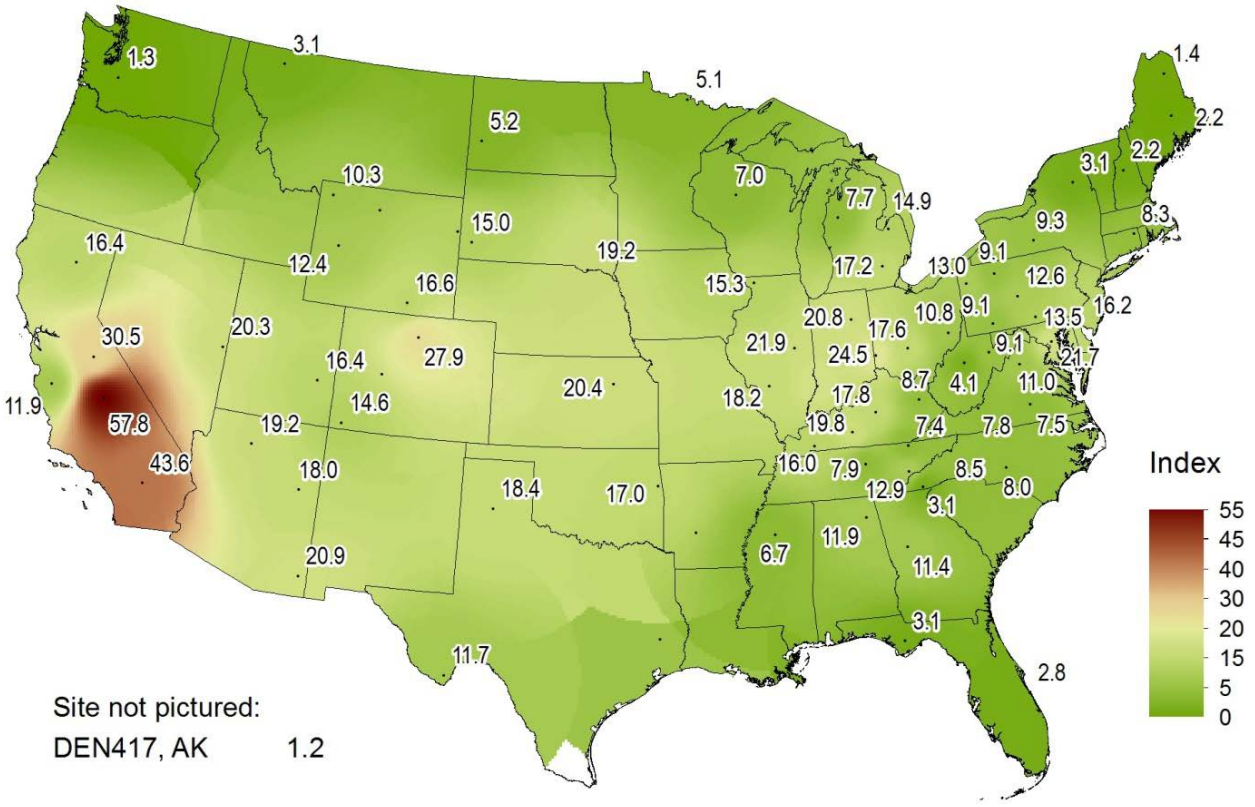


Figure 6. W126 values for 2012 in ppm-hour (AMEC Environment and Infrastructure, Inc. 2014)

7.4 VISIBILITY AND DEPOSITION MODELING

Visibility—Visibility modeling was performed using the CFO Reasonable Foreseeable Development (RFD) potential oil and gas well development scenario and with mitigation using EPA's on-the-books emission controls and additional management controls. This analysis tiers to the modeling that was performed in

the ARTSD for the CFO for results of visibility impairment indicating that for the Carlsbad region, visibility impacts on CCNP at the project level are minimal and not expected to be of concern for the CCNP (Engler and Cather 2012 & URS 2013). The visibility screening analysis followed the recommendations in the FLAG Phase I Report – Revised Guidelines (FLAG 2010). The analysis relies on a 0.5 and 1.0 delta-deciview (change in visibility) threshold, calculated for base year 2008, base case 2017, and future RFD years. Non-project, cumulative emissions are driving the overall visibility impacts. A refinement of the cumulative emissions would reduce the number of days of total visibility impacts and would likely be closer to baseline and future visibility impacts. Any refinement down to a smaller scope of development or project-specific level would likely reduce the number of days of total visibility impacts that would be likely closer to matching actual base and future visibility impacts/baseline conditions (URS 2013). Further refinement of the URS 2013 visibility modeled results was performed to show relative impacts. The results indicate that there are no days in which the threshold is exceeded at the project level for the Carlsbad Caverns National Park (CCNP).

Deposition—Deposition modeling was performed using the CFO RFD potential oil and gas well development scenario and with mitigation using EPA's on-the-books emission controls and additional management controls. This analysis tiers to the modeling that was performed in the ARTSD for results of nitrogen and sulfur deposition impairment (Engler and Cather 2012 & URS 2013).

To assess potential nitrogen and sulfur deposition impacts in the planning area, deposition impacts were compared to the NPS screening deposition analysis thresholds (DATs), which are defined as 0.005 kilogram per hectare per year (kg/ha/yr) in the western United States for both nitrogen and sulfur. A DAT is the additional amount of nitrogen or sulfur deposition within a Class I area, below which estimated impacts from a proposed new or modified source are considered to be insignificant. The DAT is a screening threshold that was developed primarily to assess impacts from a single stationary source (FLAG 2000 & 2010). Modeling results showing deposition greater than a DAT do not strictly indicate the need for mitigation. If a DAT is exceeded, cumulative modeling may be required to demonstrate that cumulative deposition is below the level of concern (LOC). The LOC for the nitrogen and sulfur deposition values, defined by the NPS and U.S. Forest Service, is 3 kg/ha/yr for nitrogen and 5 kg/ha/yr for sulfur (Fox et al. 1989).

Results of analysis showed that the maximum annual nitrogen DAT at the project level was exceeded for CCNP but may be below the LOC at specific receptors. Cumulatively, the LOC for nitrogen was found to be below the LOC value of 3 kg/ha/yr for CCNP (Figure 7; URS 2013). Both the maximum annual sulfur DAT at the project and cumulative level (not shown) were below the DAT and LOC thresholds, respectively, for CCNP. Deposition rates that are below the level of concern are believed to cause no adverse impacts. Appendix R and Appendix S of the ARTSD provide detailed nitrogen deposition results for cumulative impacts (URS 2013). It should be noted that for a large aggregate project that includes thousands of sources (such as oil and gas development in the CFO), deposition greater than the DAT is typical. For the lease parcels identified as being within closest proximity of the CCNP, degradation of air quality related to nitrogen deposition could occur, depending on the number of sources present during development and any mitigation applied.

Area with Greatest Predicted Impact	Maximum Modeled Project Deposition (kg/ha/yr)	DAT* (kg/ha/yr %)	Background Deposition (kg/ha/yr)	Total Project Deposition (kg/ha/yr)	LOC† (kg/ha/yr %)
Class I		*0.005*			*3.0*
Salt Creek Wilderness	0.29	5,800%	2.59	2.88	93%
Carlsbad Caverns National Park	0.19	3,800%	2.59	2.77	92%
Sensitive Class II		*0.005*			*3.0*
Bitter Lake National Wildlife Refuge	0.29	5,800%	2.59	2.88	93%
Grulla National Wildlife Refuge	0.11	2,200%	2.59	2.70	90%

Figure 7. Maximum Annual Nitrogen Deposition Source: URS 2013

* The DAT is shown in italics, while the maximum modeled deposition is provided as a percentage of the DAT.

† The LOC is shown in italics, while the maximum total deposition is shown as a percentage of the LOC.

In 2016, Chevron developed a Master Development Plan in which 436 oil and gas wells were projected to be developed on over 106 well pads. Although it is not anticipated that all wells will be developed concurrently during this lease sale, similar results of AQRVs can be expected for large well development projects. The Chevron analysis extends the URS (2013) modeling that was performed and updates NO_x emissions in the project area. The results of acid deposition monitoring showed incremental exceedances of the nitrogen DAT of 0.005 kg/ha/yr in the CCNP during drilling operations but would be well below the DAT once drilling is completed (BLM 2016).

It is expected that a refined analysis may be required at the time of proposed lease development for well development that could potentially impact nitrogen deposition at the CCNP. A refined analysis of acid deposition must address the following criteria:

- Is the affected area sensitive to deposition?
- Is the affected area currently impacted by deposition?
- Have critical loads or target loads been developed for the affected area?
- Does current deposition exceed the critical load or target load?

This refined analysis should be in consultation with the NPS as prescribed in FLAG guidance (U.S. Forest Service et al. 2011). The Federal Land Managers will do their best to manage and protect resources at every area that they administer. Where possible, the most intrusive monitoring and instrumentation should be conducted adjacent to the Class I area if such areas adequately represent the area of concern. Federal Land Managers believe that the need to minimize potential impacts on a Class I area should be a major consideration in the best available control technology (BACT) determination for a project proposed near such an area. Therefore, if a source proposes to locate near a Class I area, additional costs to minimize impacts on sensitive Class I resources may be warranted, even though such costs may be considered economically unjustified under other circumstances (FLAG 2010).

8 CUMULATIVE EFFECTS

More specific information about sources in New Mexico's oil and gas producing regions which have the greatest impacts on air quality and greenhouse gases is included below. The CEQ regulations define cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions" (40 CFR 1508.7; (DOI 2008).

8.1 CURRENT AND REASONABLY FORESEEABLE CONTRIBUTIONS TO CUMULATIVE EFFECTS

A list of major sources (sources emitting more than 100 tons/year of CO, VOC, NO_x, SO_2, $PM_{2.5}$, or PM_{10}) in New Mexico, Kansas, Oklahoma, and Texas can be found in Appendix D. Any of these sources may contribute to cumulative effects within a local or regional context. All major sources in the figures represent emissions from the National Emission Inventory 2014, with the exception of CO, in which the available data is from 2011. Figures 8-13 show a map of major sources in the four-state area for pollutants of concern. These maps are also included in Appendix D.

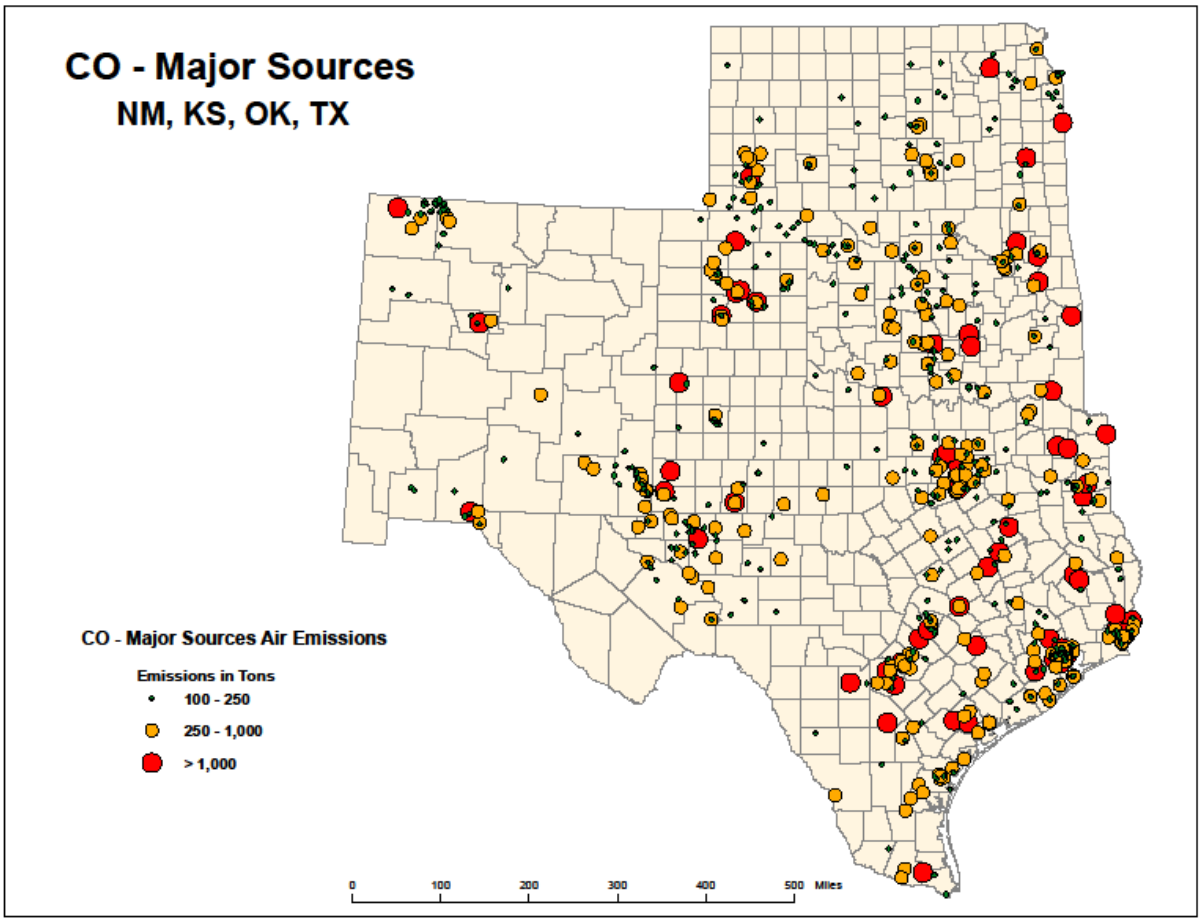


Figure 8 Major Emissions Sources (CO), New Mexico, Kansas, Oklahoma and Texas (EPA 2017b)

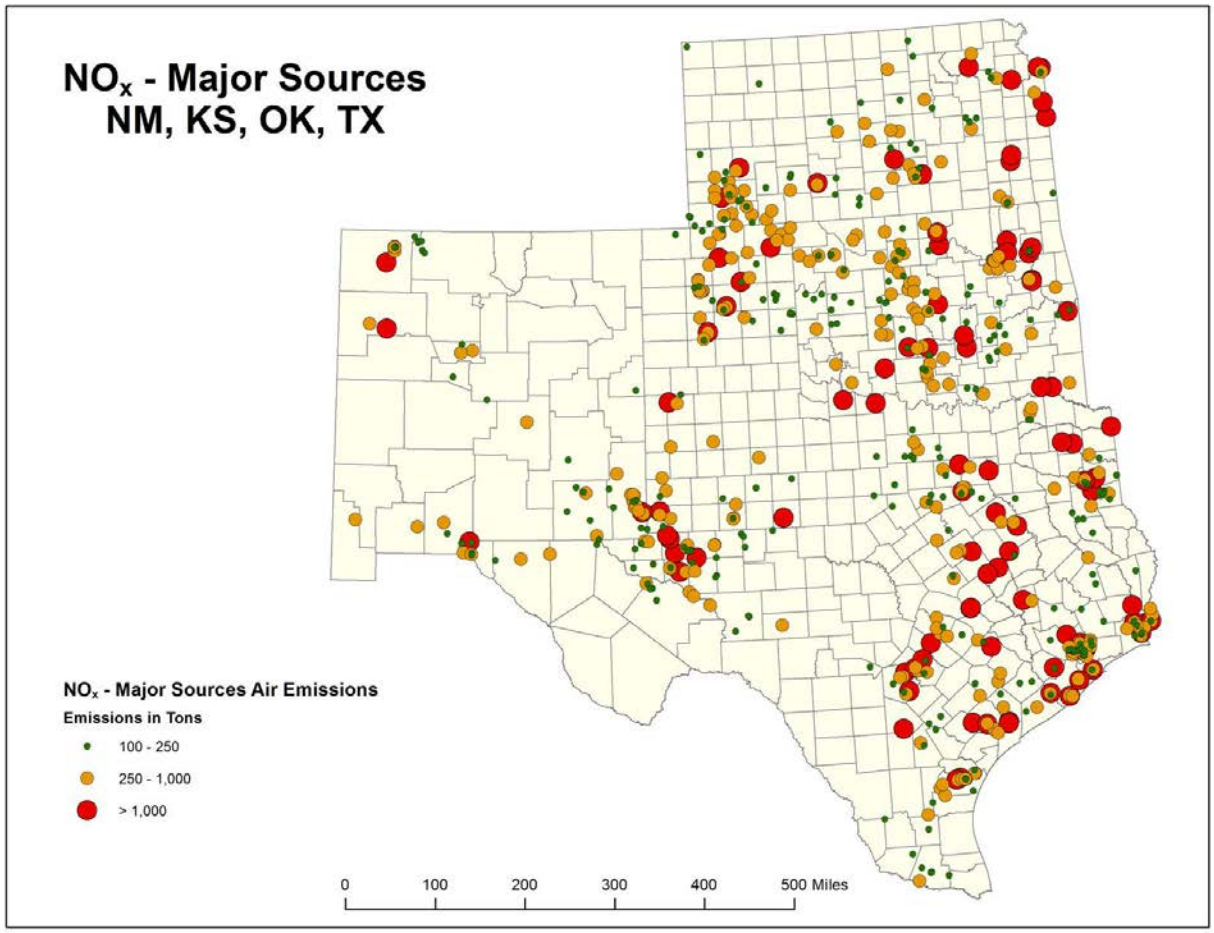


Figure 9. Major Emissions Sources (NOx), New Mexico, Kansas, Oklahoma and Texas (EPA 2017b)

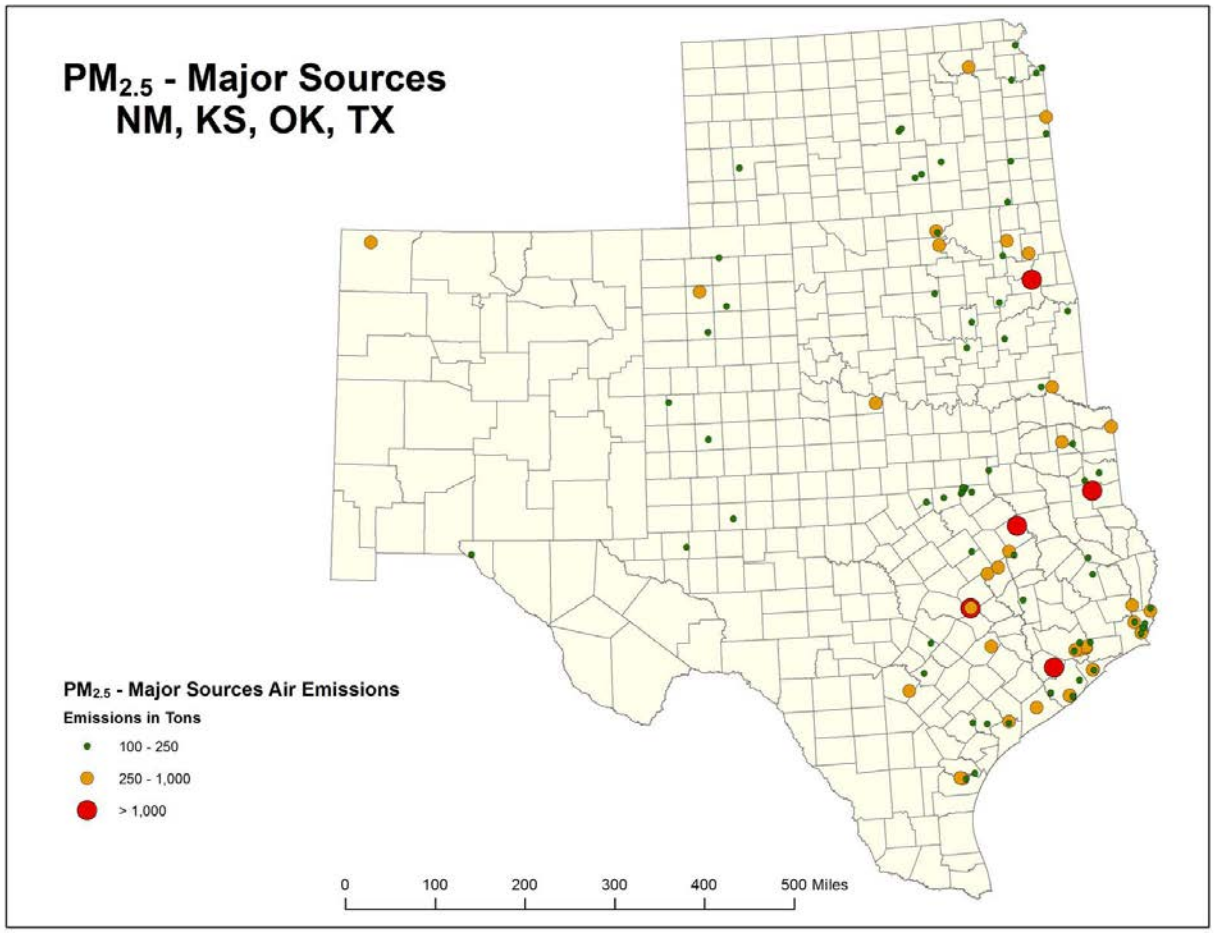


Figure 10. Major Emissions Sources (PM2.5), New Mexico, Kansas, Oklahoma and Texas (EPA 2017b)

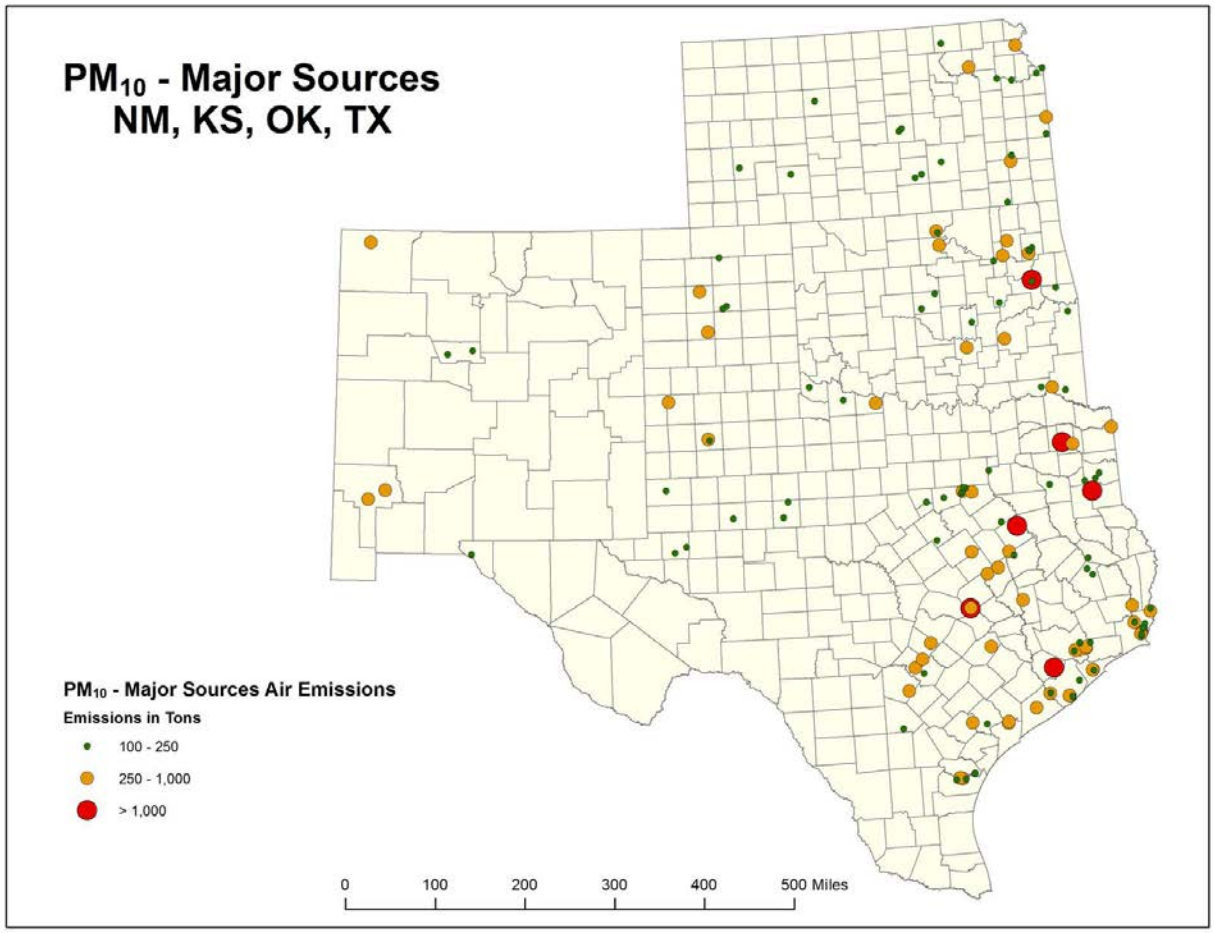


Figure 11. Major Emissions Sources (PM10), New Mexico, Kansas, Oklahoma and Texas (EPA 2017b)

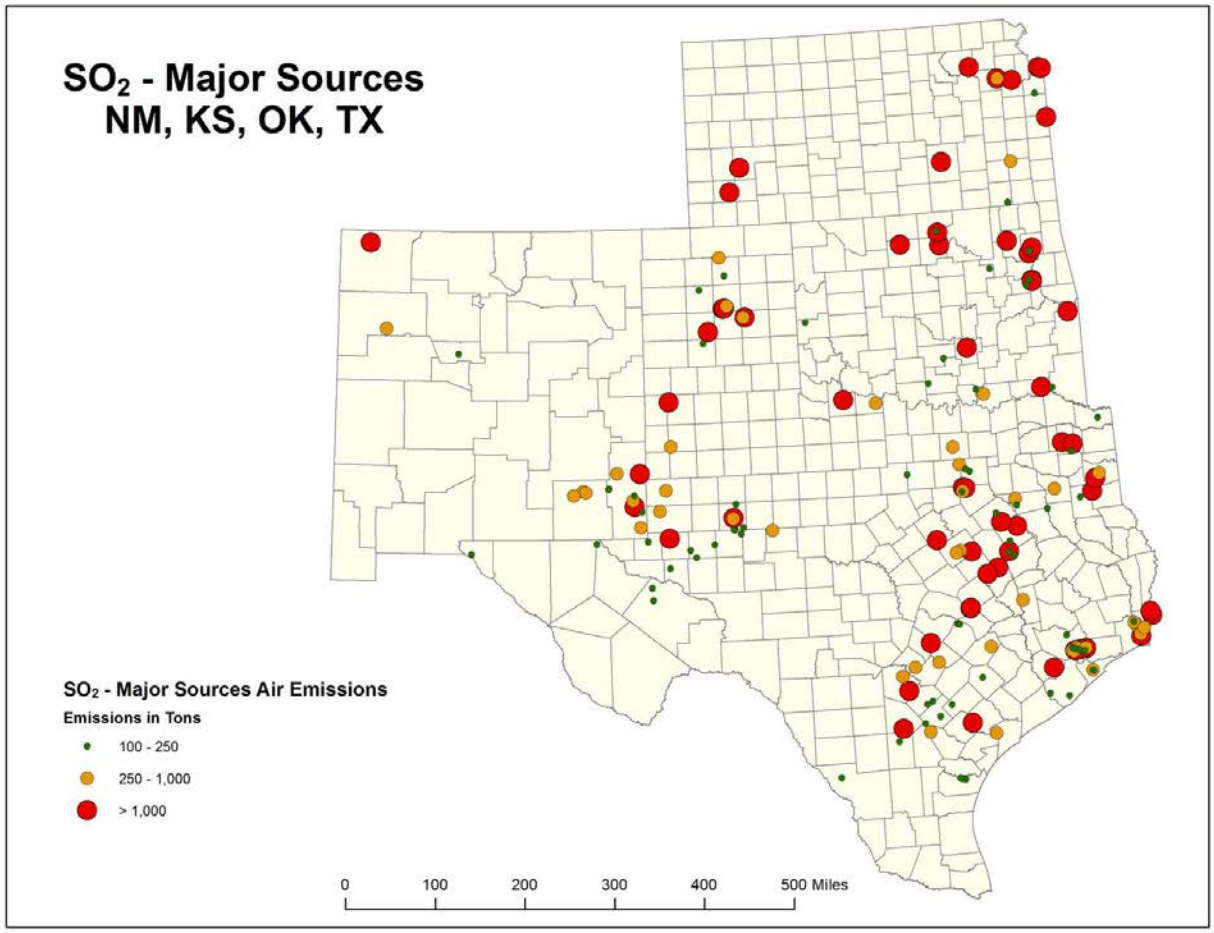


Figure 12. Major Emissions Sources (SO2), New Mexico, Kansas, Oklahoma and Texas (EPA 2017b)

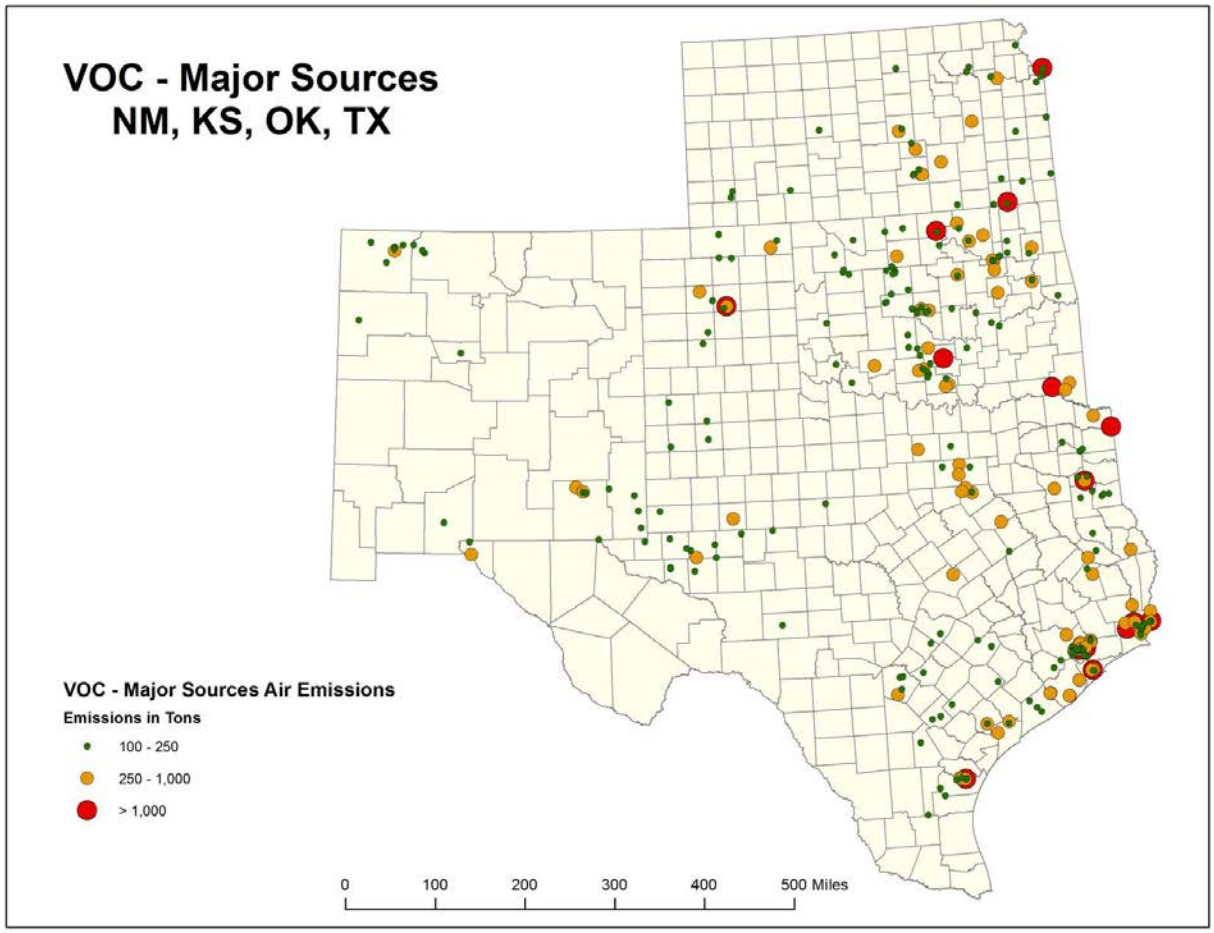


Figure 13. Major Emissions Sources (VOC), New Mexico, Kansas, Oklahoma and Texas (EPA 2017b)

9 CLIMATE, CLIMATE CHANGE & GREENHOUSE GASES

9.1 CLIMATE

Climate is the composite of generally prevailing weather conditions of a particular region throughout the year, averaged over a series of years. Climate averages for 1981-2010, known as the current normal as defined by the World Meteorological Organization, are 30-year averages of temperature and precipitation for the previous three decades and are included in Appendix C. The next set of 30-year averages will be available again in 2021 for 1991-2020.

9.2 CLIMATE CHANGE

Climate change is a statistically significant and long-term change in climate patterns. The terms climate change and “global warming” are often used interchangeably, although they are not the same thing. Climate change is any deviation from the average climate, whether warming or cooling, and can result from both natural and human (anthropogenic) sources. Natural contributors to climate change include

fluctuations in solar radiation, volcanic eruptions, and plate tectonics. Global warming refers to the apparent warming of climate observed since the early-twentieth century and is primarily attributed to human activities such as fossil fuel combustion, industrial processes, and land use changes.

Climate change may reinforce (positive feedback) or reduce (negative feedback) an expected temperature increase. A feedback is the process by which changing one quantity results in the amplification or diminishment of another. An example of a positive feedback is the reduced albedo (reflectivity) of land surfaces from the melting of snow and ice. A warming climate is also expected to increase methane release from hydrates, thereby reinforcing the warming trend. There are also feedbacks related to carbon, water, and geochemical cycles. The results of most climate feedbacks are expected to amplify warming, but the exact magnitudes of these effects are difficult to quantify (IPCC 2013).

9.3 GREENHOUSE GASES

Atmospheric concentrations of naturally-emitted GHGs have varied for millennia and earth's climate fluctuated accordingly. However, since the beginning of the industrial revolution around 1750, human activities have significantly increased GHG concentrations and introduced man-made compounds that act as GHGs in the atmosphere. The atmospheric concentrations of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) have increased to levels unprecedented in at least the last 800,000 years. From pre-industrial times until today, the global average concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by around 40%, 150%, and 20%, respectively, Intergovernmental Panel on Climate Change (IPCC) 2013. Table 9 shows the average global concentrations of CO_2, CH_4, and N_2O in 1750, 2011 and 2017. Atmospheric concentrations of GHGs are reported in parts per million (ppm) and parts per billion (ppb).

Table 9. Average global concentrations of greenhouse gases in select years (IPCC 2007, IPCC 2013 & EPA 2019f)

Greenhouse Gas	Pre-Industrial 1750	2011	2017	Increase 1750 – 2011
Carbon dioxide, CO_2	278 ppm	390.5 ppm	407 ppm[a]	46%
Methane, CH_4	722 ppb	1803 ppb	1850 ppb[b]	156%
Nitrous oxide, N_2O	270 ppb	324 ppb	330 ppb[b]	22%

[a]The atmospheric CO_2 concentration is the 2017 annual average at the Mauna Loa, HI station (NOAA/ESRL 2018a). The concentration in 2018 at Mauna Loa was 409 ppm. The global atmospheric CO_2 concentration, computed using an average of sampling sites across the world, was 405 ppm in 2017 (EPA 2019f).

[b] The values presented are global 2017 annual average mole fractions (EPA 2019f).

Human activities emit billions of tons of carbon dioxide (CO_2) every year. Carbon dioxide is primarily emitted from fossil-fuel combustion, but has a variety of other industrial sources. Methane (CH_4) is emitted from oil and natural gas systems, landfills, mining, agricultural activities, waste and other industrial processes. Nitrous oxide (N_2O) is emitted from anthropogenic activities in the agricultural, energy-related, waste and industrial sectors. The manufacture of refrigerants and semiconductors, electrical transmission, and metal production emit a variety of trace GHGs (including hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride, (SF_6). These trace gases have no natural sources and come entirely from human activities. Carbon dioxide, methane, nitrous oxide, and the trace gases are considered well-mixed and long-lived GHGs.

9.4 OTHER GASES, ATMOSPHERIC AEROSOLS AND PARTICULATES

Several gases do not have a direct effect on climate change, but indirectly affect the absorption of radiation by impacting the formation or destruction of GHGs. These gases include carbon monoxide (CO), oxides of nitrogen (NO_x), and non-methane volatile organic compounds (NMVOCs). Fossil fuel combustion and industrial processes account for the majority of emissions of these indirect GHGs. Unlike other GHGs, these gases are short-lived in the atmosphere.

Atmospheric aerosols, or particulate matter (PM), also contribute to climate change. Aerosols directly affect climate by scattering and absorbing radiation (aerosol-radiation interactions) and indirectly affect climate by altering cloud properties (aerosol-cloud interactions). Particles less than 10 micrometers in diameter (PM_{10}) typically originate from natural sources and settle out of the atmosphere in hours or days. Particles smaller than 2.5 micrometers in diameter ($PM_{2.5}$) often originate from human activities such as fossil fuel combustion. These so-called “fine” particles can exist in the atmosphere for several weeks and have local short-term impacts on climate. Aerosols can also act as cloud condensation nuclei (CCN), the particles upon which cloud droplets form.

Light-colored particles, such as sulfate aerosols, reflect and scatter incoming solar radiation, having a mild cooling effect, while dark-colored particles (often referred to as “soot” or “black carbon”) absorb radiation and have a warming effect. There is also the potential for black carbon to deposit on snow and ice, altering the surface albedo (or reflectivity), and enhancing melting. There is high confidence that aerosol effects are partially offsetting the warming effects of GHGs, but the magnitude of their effects contribute the largest uncertainty to our understanding of climate (IPCC 2013).

9.5 THE NATURAL GREENHOUSE EFFECT

The natural greenhouse effect is critical to the discussion of climate change. The greenhouse effect refers to the process by which greenhouse gases (GHGs) in the atmosphere absorb heat energy radiated by earth’s surface. Water vapor is the most abundant GHG, followed by carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and several trace gases. These GHGs trap heat that would otherwise be radiated into space, causing earth’s atmosphere to warm and making temperatures suitable for life on earth. Without the natural greenhouse effect, the average surface temperature of the earth would be

about zero degrees Fahrenheit. Water vapor is often excluded from the discussion of GHGs and climate change since its atmospheric concentration is largely dependent upon temperature rather than being emitted by specific sources.

9.6 GREENHOUSE GASES AND GWPS

Common air emissions related to oil and gas activities include carbon dioxide (CO2), methane (CH4), Nitrous Oxide (N2O), and several fluorinated species of gases such as hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Carbon dioxide is emitted from the combustion of fossil fuels (oil, natural gas and coal), solid waste, trees and wood products, and as a result of other chemical reactions (e.g., manufacture of cement). The production and transport of coal, natural gas and oil emit methane which can also be emitted from coal mining operations, naturally-occurring coal methane seepages, leaks from the oil and gas industry, livestock and other agricultural practices and by the decay of organic waste in municipal solid waste landfills. Agricultural and industrial activities emit nitrous oxide, as well as during combustion of fossil fuels and solid waste. Fluorinated gases are powerful greenhouse gases that are emitted from a variety of industrial processes and are often used as substitutes for ozone-depleting substances (i.e., CFCs, HCFCs, and halons), but typically not from oil and gas operations.

All of the different greenhouse gases have various capacities to trap heat in the atmosphere, known as global warming potentials (GWPs). Global Warming Potential (GWP), is a relative measure that compares the heat absorbing ability of a certain mass of a gas relative to the same mass of carbon dioxide (CO_2). A second metric that is gaining prominence is Global Temperature change Potential (GTP). GTP is based on the change in global mean surface temperature at a chosen point in time, relative to that caused by CO_2. A number of other metrics may also be used, but no single metric accurately compares all consequences and the choice of metric is a value judgment (IPCC 2013).

Several different time horizons can express GWPs to fully account for the gases' ability to absorb infrared radiation (heat) over their atmospheric lifetime. The BLM uses the 100-year time horizon since most of the climate change impacts derived from climate models are expressed toward the end of the century. Also, in accordance with international GHG reporting standards under the United Nations Framework Convention on Climate Change (UNFCCC) and in order to maintain consistent comparisons over the years, official GHG emission estimates for the United States are reported based on the GWP values given in the Fourth Assessment Report (AR4) of the IPCC (IPCC 2007).

Updated GWPs are reported in the Fifth Assessment Report (AR5) as the level of scientific understanding increases. The atmospheric lifetimes and GWPs for the major GHGs over the 20-year and 100-year time horizons are listed below in Table 2 for comparison. Carbon dioxide has a GWP of one, and for the purposes of analysis a GHGs GWP is generally standardized to a carbon dioxide equivalent (CO2e), or the equivalent amount of CO_2 mass the GHG would represent. In the AR5 report, methane has a current GWP estimated to be 28 and nitrous oxide has a GWP of 265 (IPCC 2013).

Table 10. Global Warming Potentials (100-year time horizon) (IPCC 2007 & IPCC 2013)

Greenhouse Gas	GWP values for 100-year time horizon	
	AR4	**AR5**
Carbon dioxide, CO_2	1	1
Methane, CH_4	25	28
Nitrous oxide, N_2O	298	265
Select Hydrofluorocarbons, HFCs	124-14,800	4-12,400
Sulfur hexafluoride, SF_6	22,800	23,500
Greenhouse Gas	**GWP values for 20-year time horizon**	
	AR4	**AR5**
Carbon dioxide, CO_2	1	1
Methane, CH_4	72	84
Nitrous oxide, N_2O	299	264
Select Hydrofluorocarbons, HFCs	437-12,000	<1-10,800
Sulfur hexafluoride, SF_6	16,300	17,500

1 For consistency with the U.S. EPA and its Inventory of Greenhouse Gas Reporting; we have represented values from AR4 of the IPCC report in this report.

9.7 CLIMATE CHANGE PROJECTIONS

Our current understanding of the climate system comes from the cumulative results of observations, experimental research, theoretical studies, and model simulations. Climate change projections are based on a hierarchy of climate models that range from simple to complex, coupled with comprehensive Earth System Models. For the Fifth Assessment Report (AR5), scientists estimated future climate impacts based on a range of Representative Concentration Pathways (RCPs) for well-mixed GHGs in model simulations carried out under the Coupled Model Intercomparison Project Phase 5 (CMIP5) of the World Climate Research Programme (IPCC 2013). The RCPs represent a range of mitigation scenarios

that are dependent upon socio-economic and geopolitical factors and have different targets for radiative forcing (RF) in 2100 (2.6, 4.5, 6.0, and 8.5 W m^{-2}). The scenarios are considered to be illustrative and do not have probabilities assigned to them.

AR5 uses terms to indicate the assessed likelihood of an outcome ranging from *exceptionally unlikely* (0 – 1% probability) to *virtually certain* (99 – 100% probability) and level of confidence ranging from *very low* to *very high*. The findings presented in AR5 indicate that warming of the climate system is unequivocal and many of the observed changes are unprecedented over decades to millennia. It is *certain* that Global Mean Surface Temperature (GMST) has increased since the late 19th century and *virtually certain* (99 – 100% probability) that maximum and minimum temperatures over land have increased on a global scale since 1950. The globally averaged combined land and ocean surface temperature data show a warming of 0.85°C (1.5°F) (IPCC 2013 & NOAA 2013). Human influence has been detected in warming of the atmosphere and the ocean, in changes in the global water cycle, in reductions in snow and ice, in global mean sea level rise, and in changes in some climate extremes. It is *extremely likely* (95 – 100% probability) that human influence has been the dominant cause of the observed warming since the mid-20th century (IPCC 2013).

Additional near-term warming is inevitable due to the thermal inertia of the oceans and ongoing GHG emissions. Assuming there are no major volcanic eruptions or long-term changes in solar irradiance, global mean surface temperature increase, for the period 2016 – 2035 relative to 1986-2005, will likely be in the range of 0.3 – 0.7°C (0.5 – 1.3°F). Global mean temperatures are expected to continue rising over the 21st century under all of the projected future RCP concentration scenarios. Global mean temperatures in 2081 – 2100 are projected to be between 0.3 – 4.8°C (0.5 – 8.6°F) higher relative to 1986 – 2005 IPCC 2013. The IPCC projections are consistent with reports from other organizations (e.g. (NASA 2013 & Joint Science Academies 2005).

Findings from AR5 and reported by other organizations (NASA 2013 & NOAA 2013) also indicate that changes in the climate system are not uniform and regional differences are apparent. Some regions will experience precipitation increases, and other regions will have decreases or not much change. The contrast in precipitation between wet and dry regions and between wet and dry seasons is expected to increase. The high latitudes are *likely* (66 – 100% probability) to experience greater amounts of precipitation due to the additional water carrying capacity of the warmer troposphere. Many mid-latitude arid and semi-arid regions will *likely* (66 – 100% probability) experience less precipitation (IPCC 2013).

9.7.1 GENERAL CLIMATE CHANGE PREDICTIONS

Climate change is a global process that is impacted by the sum total of GHGs in the Earth's atmosphere. Currently, Global Climate Models are unable to forecast local or regional effects on resources (IPCC 2013). However, there are general projections regarding potential impacts to natural resources and plant and animal species that may be attributed to climate change from GHG emissions over time; however, these effects are likely to be varied, including those in the southwestern United States (Karl

2009). For example, if global climate change results in a warmer and drier climate, increased particulate matter impacts could occur due to increased windblown dust from drier and less stable soils. Cool season plant species' spatial ranges are predicted to move north and to higher elevations, and extinction of endemic threatened or endangered plants may be accelerated. Due to loss of habitat or competition from other species whose ranges may shift northward, the populations of some animal species may be reduced or increased. Less snow at lower elevations would likely impact the timing and quantity of snowmelt, which, in turn, could impact water resources and species dependent on historic water conditions (Karl 2009).

Climate change will impact regions differently and warming will not be equally distributed. Both observations and computer model predictions indicate that increases in temperature are likely to be greater at higher latitudes, where the temperature increase may be more than double the global average. Warming of surface air temperature over land will very likely be greater than over oceans (IPCC 2013). There is also high confidence that warming relative to the reference period will be larger in the tropics and subtropics than in mid-latitudes. Frequency of warm days and nights will increase and frequency of cold days and cold nights will decrease in most regions. Warming during the winter months is expected to be greater than during the summer, and increases in daily minimum temperatures are more likely than increases in daily maximum temperatures. Models also predict increases in duration, intensity, and extent of extreme weather events. The frequency of both high and low temperature events is expected to increase. Near- and long-term changes are also projected in precipitation, atmospheric circulation, air quality, ocean temperatures and salinity, and sea ice cover.

9.7.2 REGIONAL CLIMATE CHANGE PREDICTIONS

In the region encompassing southern Colorado and New Mexico, average temperatures rose just under 0.7 degrees Fahrenheit per decade between 1971 and 2011, which is approximately double the global rate of temperature increase (Rahmstorf 2012). These rates of warming are unprecedented over the past 11,300 years (Marcott 2013). Climate modeling suggests that average temperatures in this region may rise by 4-6 degrees Fahrenheit by the end of the 21st century, with warming increasing from south to north. By 2080-2090, the southwestern U.S. will see a 10-20% decline in precipitation, primarily in winter and spring, with more precipitation falling as rain (Cayan 2013).

In a recent report, the Bureau of Reclamation (Bureau of Reclamation, Sandia National Laboratories, U.S. Army Corps of Engineers 2013) made the following projections through the end of the 21st century for the Upper Rio Grande Basin (Southern Colorado to central southern New Mexico) based on the current and predicted future warming:

- There will be decreases in overall water availability by one quarter to one third.
- The seasonality of stream and river flows will change with summertime flows decreasing.
- Stream and river flow variability will increase. The frequency, intensity and duration of both droughts and floods will increase.

Texas, Oklahoma and Kansas are part of the Great Plains region, which will see increases in temperatures and more frequent drought in the future. Temperature increases and precipitation decreases will stress the region's primary water supply, the Ogallala Aquifer. Seventy percent of the land in this area is used for agriculture. Threats to the region associated with climate change include:

- Pest migration as ecological zones shift northward;
- Increases in weeds; and
- Decreases in soil moisture and water availability (EPA 2013).

9.7.3 STATE CLIMATE CHANGE TRENDS AND PREDICTIONS

NOAA National Centers for Environmental Information released its Climate Summaries by state in 2017 with some updated 2019 information also available. The key messages, bulleted below represent climate summary information for each state within the New Mexico State Office (NMSO) jurisdiction. More detailed climate discussions for each state can be found through the State Climate Summaries (Revised 2019) webpage and documents https://statesummaries.ncics.org/ (NOAA 2019).

9.7.3.1 NEW MEXICO

- Average annual temperature has increased by almost 2°F since the 1970s, and the number of hot days and warm nights has increased. Historically unprecedented future warming is likely.
- The summer monsoon rainfall, which provides much needed water for agricultural and ecological systems, varies greatly from year to year and future trends in such precipitation are highly uncertain.
- Droughts are a serious threat in this water-scarce state. Drought intensity is projected to increase and snowpack accumulation is projected to decrease, which will pose a major challenge to New Mexico's environmental, agricultural, and human systems. Wildfire frequency and severity are projected to increase in New Mexico (Frankson, R., K. Kunkel, L. Stevens, and D. Easterling 2017a).

9.7.3.2 OKLAHOMA

- Average annual temperature has increased by less than 1°F since the early 20th century. Winter warming has been characterized by the much below average occurrence of extremely cold days since 1990. Under a higher emissions pathway, historically unprecedented warming is projected by the end of the 21st century.
- Precipitation can vary greatly from year to year in this region of transition from humid to semi-arid conditions. Heavy precipitation events are projected to increase, which may increase the risk of flooding and associated increases in soil erosion and non-point source runoff into streams and lakes.

- The agricultural economy of Oklahoma makes the state particularly vulnerable to droughts, several of which have occurred in recent years. Higher temperatures will increase the rate of soil moisture depletion, leading to an increase in the intensity of naturally occurring future droughts (Frankson, R., K. Kunkel, L. Stevens, S. Champion, and B. Stewart, 2017b).

9.7.3.3 KANSAS

- Average annual temperature has increased about 2°F since the early 20th century, with greater warming in the winter and spring than in the summer and fall. The number of very cold nights has been much below average since 1990. Under a higher emissions pathway, historically unprecedented warming is projected by the end of the 21st century.
- Precipitation has varied greatly from year to year in this region of transition from humid conditions in the east of the state to semi-arid conditions in the west. Projected increases in winter precipitation and decreases in summer precipitation may result in both beneficial and negative impacts.
- The agricultural economy of Kansas makes the state vulnerable to droughts and heat waves, several of which occurred in the 1930s, 1950s, and in recent years. Projected increases in temperatures may increase the intensity of future droughts. The frequency of wildfire occurrence and severity is also projected to increase in Kansas (Frankson, R., K. Kunkel, L. Stevens, S. Champion, and B. Stewart, 2017c).

9.7.3.4 TEXAS

- Mean annual temperature has increased by approximately 1˚F since the first half of the 20th century. Under a higher emissions pathway, historically unprecedented warming is projected by the end of the 21st century, with associated increases in extreme heat events.
- Although projected changes in annual precipitation are uncertain, increases in extreme precipitation events are projected. Higher temperatures will increase soil moisture loss during dry spells, increasing the intensity of naturally occurring droughts.
- The number of landfalling hurricanes in Texas is highly variable from year to year. As the climate warms, increases in hurricane rainfall rates, storm surge height due to sea level rise, and the intensity of the strongest hurricanes are projected (Frankson, R., K. Kunkel, L. Stevens, S. Champion, and B. Stewart, 2017d).

9.7.4 CUMULATIVE CLIMATE CHANGE SUMMARY

Existing conditions of climate change in any given location are the result of numerous complex factors, both natural and human caused. Natural factors contributing to the current condition of air resources include existing climate resulting from long-term atmospheric weather patterns, soil types, and vegetation types. Anthropogenic factors contributing to the current condition of air resources include long-term human habitation, growing human populations, transportation methods and patterns,

recreational activities, economic patterns, the presence of power plants and other industrial sources. The presence of natural resource (i.e. oil and natural gas) extraction and processing on some BLM lands also impact air quality and greenhouse gas emissions.

The IPCC concludes in AR5 that "cumulative emissions of CO2 largely determine global mean surface warming by the late 21st century and beyond." Most aspects of climate change will persist for many centuries even if emissions of CO2 are stopped. This represents a substantial multi-century climate change commitment created by past, present and future emissions of CO2 (IPCC 2013). Increasing concentrations may accelerate the rate of climate change in the future.

10 GHG ANALYSIS AND MODELING

Fossil fuel extraction; construction and operation (well development), processing and end-use production activities all contribute to air pollutants and GHG emissions in the Farmington and Carlsbad Field Office areas, especially San Juan, Northwestern Sandoval, Eddy, Lea, and Chaves counties as well as in parts of Oklahoma, Kansas and Texas. This includes midstream sources from the natural gas compressor stations and pipelines, gas plants, and petroleum refining as well as final downstream end-use by the consumer. Coal mining is also occurring in the FFO and Oklahoma Field Office (OFO) areas. Potash mining in the CFO area also contributes to air contaminant and GHG emissions.

Methodologies appropriate to GHG analysis are very different from those appropriate for air pollutant analysis. Air quality models used to predict concentrations and transport of air pollutants are not applicable to well-mixed, long-lived greenhouse gases (GHGs) which impact the atmosphere on a global scale. Global Climate Models (GCM's) cannot currently be downscaled to accurately relate GHG emissions to regional or local-scale impacts. The GHG emissions data derived from analytical tools (such as emission calculators) may be used to compare project level emissions with state, national and global emissions. However, such a comparison may not always be useful information since project level emissions are often orders of magnitude less than national level emissions. Comparisons of GHG emissions among project alternatives and an analysis of the resiliency of different project alternatives to the effects of climate change may provide more useful information. When modeling and analyzing GHG emissions, the primary sources of GHG emissions include:

- Fossil fuel combustion for construction and operation (well development) of oil and gas facilities – vehicles driving to and from production sites, engines that drive drill rigs, etc. produce CO_2 in quantities that vary depending on the age, types, and conditions of the equipment as well as the targeted formation, locations of wells with respect to processing facilities and pipelines, and other site-specific factors.
  Combustion of produced oil and gas: it is expected that development will produce marketable quantities of oil and/or gas. Combustion of the oil and/or gas would release CO_2 into the atmosphere. Fossil fuel combustion is the largest source of global CO_2.

Estimated emissions for CO_2 are obtained from the calculator (Appendix H) for the drilling and operational phases of the well, as well as for other ancillary aspects of well development. These values include emissions from combustion engines used to construct and maintain the well.

- Methane (CH_4) releases from gas well development result from venting of natural gas during the well completion process, actuation of gas operated valves during well operations, and fugitive gas leaks along the infrastructure required for the production and transmission of gas. This is a major source of global CH_4 emissions. These emissions have been estimated for various aspects of the energy sector, and starting in 2011, producers were required under 40 CFR 98, to estimate and report their CH_4 emissions to the USEPA (EPA 2019f). Estimated emissions for CH_4 are obtained from the calculator. These values include emissions from combustion engines used to construct and maintain the well (operations). No methane emissions are predicted from ancillary construction operations.

The incremental contribution to global GHGs from a proposed land management action cannot be translated into effects on climate change globally or in the area of any site-specific action. Although incremental contributions to global GHGs from a proposed land management action cannot currently be translated into effects on climate change globally or in the area of any site-specific action we can use GHG emission volumes as a proxy in determining impacts. In this way we can estimate emissions from a project or land management action and then compare those activities to the regional, national or global level of GHGs or GHGs emitted by a certain industry within a region.

The BLM has jurisdiction over federal oil and gas exploration, field operations and well site-production on Federal and Indian mineral estate. Once produced oil or gas leaves the well location (via pipeline or tanker truck), the BLM no longer has jurisdiction over these products. However, it is often necessary to estimate and analyze downstream GHG emissions more completely until the product is finally combusted (end-use).

Secretarial Order 3289, issued on September 14, 2009, established a Department-wide approach for applying scientific tools to increase understanding of climate change and to coordinate an effective response to its impacts on tribes, and on the land, water, ocean, fish and wildlife, and cultural heritage resources the Department manages. The Secretarial Order states that one must “consider and analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, and/or when making major decisions affecting DOI resources.” BLM does recognize the importance of climate change and the potential effects it could have on natural and socioeconomic environments.

For the purpose of NEPA analysis, EPA emission factors can be used to include a qualitative and quantitative analysis of possible greenhouse gas emissions that could occur as a result of reasonably foreseeable coal, oil, gas or other development connected to federal land and resource management use. Estimates are made based on readily available data and reasonable assumptions about potential future development. More detailed emissions analysis can be qualitatively discussed and calculated at a site-specific level of analysis such as those that occur at an APD stage. Estimating direct and indirect

GHG emissions attempt to provide a more complete GHG lifecycle of a well from site inspection to possible emissions through combustion.

10.1 DIRECT O&G EMISSIONS

Direct greenhouse gas emissions from speculative future oil and gas well development and production and associated activities of the proposed action are summarized in the respective NEPA document. Total carbon dioxide equivalent (CO2e), which includes direct emissions of carbon dioxide, methane and nitrous oxide with applied GWPs, from an oil or gas producing well, is calculated.

10.1.1 WELL DEVELOPMENT GHG EMISSIONS

Increased GHG emissions as a can be connected to well development. The most substantial GHGs emitted by oil and gas development and production are carbon dioxide and methane. To facilitate quantification, most analysis assumes that all wells would be developed concurrently and in the same year, though it is more likely that future potential development would not occur in this manner. Emission calculations for construction, operations, maintenance and reclamation are included in Appendix H (Calculator) section.

Construction emissions for either an oil or gas well include well pad construction (fugitive dust), heavy equipment combustive emissions, commuting vehicles and wind erosion. Emissions from operations for an oil well include well workover operations (exhaust and fugitive dust), well site visits for inspection and repair, recompletion traffic, water and oil tank traffic, venting, compression and well pumps, dehydrators and compression station fugitives. Operations emissions for a gas well include well workover operations (exhaust and fugitive dust), wellhead and compressor station fugitives, well site visits for inspection and repair, recompletions, compression, dehydrators, and compression station fugitives. Maintenance emissions for either an oil and gas well are for road travel, and reclamation emission activities. Interim and final activities include emissions from truck traffic, a dozer, blade, and track hoe equipment.

Emissions are anticipated to be at their highest level during the construction and completion phases of implementation (approximately 30 days in duration) because these phases require the highest degree of earth-moving activity, heavy equipment use, and truck traffic, compared with the operations and maintenance phases of implementation. Emissions are anticipated to decline during operations and maintenance as the need for earth-moving and heavy equipment declines.

Table 11 provides past well completion data and associated GHG emissions (CO_2e) based on APD activity from the BLM AFMSS system (BLM 2019). GHG emissions (CO_2e) are calculated for the total number of well completions using a per well emission factor based on activities during well. The emissions provide a maximum emissions scenario as the number of wells each year is multiplied by approximately 1,229 and 1,253 metric tons of CO_2e/year in the Farmington Field Office and Pecos District Office respectively, which assumes all wells are gas wells. It is likely that emissions in the Permian basin (PDO) would be

lower due to the predominant well type being oil wells. In the San Juan Basin (FFO) more gas wells have been developed, and emissions may be more representative in which we use the gas well emission factor.

Table 11. Well Completions and estimated GHG emissions based on APD Activity (BLM 2019)

Farmington Field Office	2014	2015	2016	2017	2018	BLM RFD (2018-2037)	# of Wells After 2018
# of BLM Well Completions*	94	71	15	30	33	1,980	33
Metric Tons of CO2e/year	115,603	87,317	18,447	36,895	40,584	2,435,037	40,584
Pecos District Office	**2014**	**2015**	**2016**	**2017**	**2018**	**BLM RFD (2016-2035)**	**# of Wells After 2016**
# of BLM Well Completions*	584	400	389	378	518	6,400	1285
Metric Tons of CO2e/year	731,517	501,039	487,260	473,482	648,846	8,016,624	1,609,588

FFO # of BLM federal & non-federal Wells in PDO RFD (2016-2037) is 3,200
PDO # of BLM federal & non-federal Wells in PDO RFD (2016-2037) is 16,000
*PDO BLM wells Includes completions from Carlsbad, Hobbs and Roswell Field Offices
*FFO BLM wells Includes completions from Farmington and Rio Puerco Field Offices
*Wells completed reported from BLM AFMSS 1&2 with run date June 20, 2019 (BLM 2019).

10.2 INDIRECT GHG EMISSIONS

Indirect greenhouse gas emissions are estimated based on speculative annual oil, gas, and/or natural gas liquids produced from the proposed action. Indirect GHG emissions are calculated for carbon dioxide intensity based on combustion of the product. Emission factors are applied to the per-barrel or per-cubic foot unit of the reasonably foreseeable development estimates. Emission factors used in BLM GHG Indirect Greenhouse Gas Emissions are included below.

- Oil indirect emission factor: 0.43 MT CO2 per Barrel (EIA 2006).
- Gas indirect emission factor: 0.054717 MT of CO2 per Mcf (EPA 2016e).
- Natural Gas Liquids indirect emission factor 13.7 pounds of CO2 per gallon of Prop/Buta mix (EIA 2006)

10.2.1 OIL AND GAS PRODUCTION (DOWNSTREAM EMISSIONS (END-USE))

It is important to note that the BLM does not exercise control over the specific end use of the oil and gas produced from any individual federal lease. The BLM has no authority to direct or regulate the end use of the produced oil and/or gas. As a result, the BLM can only provide an estimate of potential GHG emissions using national approximations of where or how the end use may occur because coal, oil,

condensate, and natural gas could be used for combustion of transportation fuels, fuel oils for heating and electricity generation, as well as production At this time, there is some uncertainty with regard to the actual development that may occur.

Table 12 details the latest oil and gas production volumes on federal lands within the jurisdiction of the BLM New Mexico as well as the United States and New Mexico production as a whole. A rough estimate was possible using publicly available information and common accepted estimates for CO2e.

Table 12. 2018 Oil and 2017 Gas Production (DOI 2018 & EIA 2018)

Location	Oil (bbl)[1]	% U.S. Total	Gas (MMcf)[1]	% U.S. Total
United States	4,011,521,000	100	27,291,222	100
New Mexico	248,958,000	6.21	1,196,514	4.38
Federal leases NM[2]	127,120,000	3.17	757,803	2.78
San Juan Basin	5,089,000	0.13	464,709	1.92
Permian Basin	122,032,000	3.04	293,094	1.07
Kansas	35,714,000	0.89	195,859	0.72
Federal leases KS[3]	115,000	0.003	3,859	0.01
Oklahoma	200,685,000	5.00	2,316,693	8.49
Federal leases OK[3]	560,000	0.01	14,713	0.05
Texas	1,609,075,000	40.61	6,300,292	23.09
Federal leases TX[3]	422,000	0.01	30,655	0.11

1 Reference year for oil volumes are 2018, natural gas volumes are for year 2017, as the 2018 data year was not yet available for each individual state, using the same source, EIA 2019. Preliminary federal natural gas volumes in New Mexico and Texas for 2018 show that volumes have increased from the previous years.

2 Federal leases in NM refers to the BLM O&G activity in the following counties; Eddy, Lea, Chaves, Roosevelt, McKinley, Rio Arriba, San Juan and Sandoval.

3 Federal leases in Oklahoma, Kansas, and Texas refers to BLM O&G activity in any county reporting federal leases to the ONRR.

10.3 UNCERTAINTIES OF GHG CALCULATIONS

Although a NEPA document may present a quantified estimate of potential GHG emissions associated with reasonably foreseeable oil and gas development, there is significant uncertainty in GHG emission estimates due to uncertainties with regard to eventual production volumes and variability in flaring, construction, and transportation. A rough estimate was possible using publicly available information and using estimates from future production for reasonably foreseeable development.

Also, there is uncertainty with regard to the net effects of reasonably foreseeable oil and gas development on climate – that is, while BLM actions may contribute to the climate change phenomenon, the specific effects of those actions on global climate are speculative given the current state of the science. Inconsistencies in the results of scientific models designed to predict climate change on regional or local scales limits the ability to quantify potential future impacts of decisions made at this level and determining the significance of any discrete amount of GHG emissions is beyond the limits of existing science at the present time.

10.4 REASONABLY FORESEEABLE DEVELOPMENT SCENARIOS (RFDS)

10.4.1 FARMINGTON FIELD OFFICE (FFO)

Table 13 provides the reasonably foreseeable future GHGs (CO_2e emissions) associated with end-use oil and gas combustion emissions for the 2018 Mancos Gallop RFD scenario from federal, state (fee) as well as Indian minerals in the planning area. Total cumulative well development will result in 3,200 new wells from 2018-2037. Of that number, 1,980 are federal new well development. The methodology for estimating new well development as well as the volumes for oil and gas is described in the Mancos Gallup 2018 RFD (Crocker and Glover 2018).

CO_2e emissions from downstream/end-use combustion of oil and gas products are estimated annually and cumulatively for BLM development and an all development (federal & non-federal) well production development scenario (Table 13). Under the all development scenario (includes Federal, Indian, state and fee minerals), cumulative emissions during the 20-year period is estimated to produce 398.4 MMT of CO_2e from the end-use combustion of products from 3,200 wells. The range of annual CO_2e emissions is 15.3 MMT/year in 2024 during the development of 126 additional oil and gas wells to 28.5 MMT/yr of CO_2e in 2037 when 253 annual oil and gas wells are added that year.

Over the 20-year period, cumulative federal only wells would produce 247.4 MMT of CO_2e emissions from end-use combustion of oil and gas fossil fuels from 1,980 wells. The range of annual CO_2e emissions is 9.6 MMT/year in 2024 during the development of 78 oil and gas wells to 17.3 MMT/year of CO_2e in 2037 during the development of 156 annual oil and gas wells. This would represent 0.97 percent to 1.75 percent respectively of BLM's 2020 annual future estimated GHG emissions from end-use

combustion (Table 24). It would represent a contribution of 1.11 percent to 1.99 percent respectively to BLM's annual 2030 future estimated downstream (end-use) GHG emissions (Table 24). It should be noted that Table 24 also includes emissions from coal which produces 50 to 60 percent more carbon dioxide emissions than natural gas.

Table 13. Estimated Cumulative Downstream/End Use GHG Emissions Resulting from Oil and Gas Production BLM 2018 Mancos Gallup RFD Scenario (Crocker and Glover 2018)

Federal Wells in the Planning Area (Federal development only)

Year	Number of Wells	Annual CO2e- (MMT) Oil	Annual CO2e- (MMT) Gas	Annual CO2e (MMT) Oil & Gas	CO2e % of Total RFD
2018	41	2.14	13.04	15.18	6.14
2019	48	2.34	10.77	13.12	5.30
2020	53	2.51	9.08	11.60	4.69
2021	59	2.69	7.89	10.58	4.28
2022	65	2.86	7.08	9.94	4.02
2023	72	3.02	6.68	9.70	3.92
2024	78	3.20	6.43	9.62	3.89
2025	84	3.39	6.30	9.69	3.92
2026	90	3.59	6.33	9.92	4.01
2027	96	3.80	6.47	10.28	4.16
2028	103	4.03	6.72	10.75	4.35
2029	109	4.26	7.05	11.31	4.57
2030	112	4.44	7.38	11.82	4.78
2031	120	4.70	7.81	12.52	5.06
2032	127	4.96	8.28	13.24	5.35
2033	133	5.22	8.76	13.99	5.65
2034	139	5.49	9.28	14.78	5.97
2035	145	5.77	9.82	15.59	6.30
2036	150	6.05	10.40	16.45	6.65
2037	156	6.32	10.98	17.29	6.99
TOTAL	1980	80.80	166.57	247.37	100

All Wells in the Planning Area (including Federal, Indian, state, and fee minerals)

Year	Number of Wells	Annual CO2e- (MMT) Oil	Annual CO2e- (MMT) Gas	Annual CO2e (MMT) Oil & Gas	CO2e % of Total RFD
2018	67	3.32	20.72	24.04	6.03
2019	76	3.61	17.14	20.76	5.21
2020	86	3.85	14.50	18.35	4.61
2021	96	4.10	12.65	16.75	4.20
2022	106	4.33	11.42	15.74	3.95
2023	116	4.55	10.82	15.37	3.86
2024	126	4.79	10.49	15.28	3.84
2025	136	5.06	10.36	15.42	3.87
2026	146	5.34	10.49	15.84	3.98
2027	156	5.65	10.81	16.46	4.13
2028	166	5.99	11.30	17.29	4.34
2029	176	6.34	11.91	18.25	4.58
2030	180	6.23	12.54	18.77	4.71
2031	194	6.88	13.37	20.25	5.08
2032	204	7.32	14.25	21.57	5.41
2033	214	7.73	15.13	22.86	5.74
2034	224	8.15	16.07	24.22	6.08
2035	234	8.58	16.99	25.56	6.42
2036	244	8.99	18.07	27.06	6.79
2037	253	9.39	19.14	28.53	7.16
TOTAL	3200	120.21	278.17	398.38	100

10.4.2 PECOS DISTRICT OFFICE PLANNING AREA (PDO)

Table 14 provides the reasonably foreseeable future GHGs (CO_2e emissions) associated with end-use oil and gas combustion emissions for Pecos District Office from federal, state (fee) as well as Indian minerals in the planning area. The Pecos District Office federal planning area includes oil and gas well development from Carlsbad Field Office (FO), Roswell FO as well as Hobbs FO. Total cumulative well development will result in 16,000 new wells from 2016-2035. Of that number, 6,400 are new federal well development. The methodology for estimating new well development as well as the volumes for oil and gas is described in Engler and Cather 2012 and SENM 2014.

CO_2e emissions from downstream/end-use combustion of oil and gas products are estimated annually and cumulatively for BLM development and for an all development (federal and non-federal) well

production scenario (Table 14). Under the all development scenario (includes Federal, Indian, state and fee minerals), cumulative emissions during the 20-year period is estimated to produce 5,574 MMT of CO_2e from the end-use combustion of oil and gas from 16,000 wells. The range of annual CO_2e emissions is 97.3 MMT/year in 2016 to 595.21 MMT/yr of CO_2e in 2035 when additional wells are added to production.

Over the 20-year period, cumulative federal only wells could produce 1163.64 MMT of CO_2e emissions from end-use combustion of oil and gas fossil fuels from 6,400 wells. The range of annual CO_2e emissions is 47.9 MMT/year in 2016 to 69.77 MMT/year of CO_2e in 2035. This would represent 4.83 percent to 7.05 percent respectively of fossil fuel end-use combustion (See Table 24). It would represent a contribution of 5.53 percent to 8.06 percent respectively to BLM's 2030 annual future estimated GHG emissions (Table 24). It should be noted that Table 24 also includes emissions from coal which produces 50 to 60 percent more carbon dioxide emissions than natural gas.

Table 14. Estimated Cumulative Downstream/End Use GHG Emissions Resulting from Oil and Gas Production BLM 2018 RFD PDO Scenario (Engler and Cather 2012 & SENM 2014)

Federal Wells in the Planning Area (Federal development only)

Year	Annual CO2e-(MMT) Oil	Annual CO2e-(MMT) Gas	Annual CO2e (MMT) Oil & Gas	CO2e % of Total RFD
2016	32.17	15.72	47.89	4.12
2017	32.81	16.04	48.85	4.20
2018	33.47	16.36	49.83	4.28
2019	34.14	16.69	50.82	4.37
2020	34.82	17.02	51.84	4.45
2021	35.52	17.36	52.88	4.54
2022	36.23	17.71	53.93	4.63
2023	36.95	18.06	55.01	4.73
2024	37.69	18.42	56.11	4.82
2025	38.44	18.79	57.23	4.92
2026	39.21	19.17	58.38	5.02
2027	40.00	19.55	59.55	5.12
2028	40.80	19.94	60.74	5.22
2029	41.61	20.34	61.95	5.32
2030	42.45	20.75	63.19	5.43
2031	43.29	21.16	64.46	5.54
2032	44.16	21.58	65.74	5.65
2033	45.04	22.02	67.06	5.76

2034	45.94	22.46	68.40	5.88
2035	46.86	22.91	69.77	6.00
TOTAL	781.61	382.03	1163.64	100

All Wells in the Planning Area (including Federal, Indian, state, and fee minerals)

Year	Annual CO2e-(MMT) Oil	Annual CO2e-(MMT) Gas	Annual CO2e (MMT) Oil & Gas	CO2e % of Total RFD
2016	65.10	32.22	97.32	1.75
2017	71.61	35.44	107.05	1.92
2018	78.77	38.99	117.76	2.11
2019	86.65	42.89	129.54	2.32
2020	95.31	47.18	142.49	2.56
2021	104.85	51.89	156.74	2.81
2022	115.33	57.08	172.41	3.09
2023	126.86	62.79	189.65	3.40
2024	139.55	69.07	208.62	3.74
2025	153.50	75.98	229.48	4.12
2026	168.85	83.57	252.43	4.53
2027	185.74	91.93	277.67	4.98
2028	204.31	101.12	305.44	5.48
2029	224.75	111.24	335.98	6.03
2030	247.22	122.36	369.58	6.63
2031	271.94	134.60	406.54	7.29
2032	299.14	148.06	447.19	8.02
2033	329.05	162.86	491.91	8.82
2034	361.95	179.15	541.10	9.71
2035	398.15	197.06	595.21	10.68
TOTAL	3,728.64	1,845.48	5,574.12	100

Table 15 shows historical U.S., New Mexico and BLM New Mexico federal production in the major oil and gas basins and their associated end-use combustion GHG emissions during calendar years 2014 through 2018. Production of oil and gas on federal lands has varied over the 5-year period due to market conditions, technological advances as well as pipeline and storage infrastructure availability. In 2015, total CO_2e end-use emissions resulting from oil and gas production in the U.S. was 2791.29 MMT. New Mexico, 2014 GHG emissions associated with oil and gas production end-use was 116.17 MMT, which is 4.16 percent of national emissions in 2014.

GHG emissions from O&G gas production in the BLM Pecos District Office planning area in 2014 was 40.10 MMT of CO2e, which is 1.44 percent of national O&G GHG emissions and 34.5 percent of New Mexico O&G GHG emissions from production in 2014. GHG end-use emissions from the BLM PDO planning area has increased to 48.85 MMT/year of CO_2e in 2017.

GHG emissions from O&G production in the BLM Farmington Field Office planning area in 2014 was 38.82 MMT of CO_2e, which is 1.39 percent of national O&G GHG emissions and 34.5 percent of New Mexico O&G GHG emissions from production in 2014. GHG end-use emissions from the BLM PDO planning area has decreased to 28.00 MMT/year of CO2e in 2017.

Table 15. Historical Federal oil and gas production New Mexico

Oil and Gas Production	2014	2015	2016	2017	2018
U.S. Oil Production (Mbbls)	3,196,889	3,442,188	3,232,025	3,413,376	4,011,521
New Mexico Oil Production (Mbbls)	125,021	147,663	146,389	171,440	248,958
BLM PDO Oil Production (Mbbls)	62,007	73,344	74,810	76,307	122,032
BLM FFO Oil Production (Mbbls)	5,755	8,457	6,889	5,980	5,089
U.S. Gas Production (MMcf)	25,889,605	27,065,460	26,592,115	27,291,222	30,438,588
New Mexico Gas Production (MMcf)	1,140,626	1,151,493	1,139,826	1,196,514	*
BLM PDO Gas Production (MMcf)	245,550	281,713	287,347	293,094	476,405
BLM FFO Gas Production (MMcf)	664,211	642,211	596,747	464,709	437,926
GHG Emissions					
Total U.S. O&G GHG Emissions (MMT) CO2e	2791.29	2961.11	2844.84	2961.08	
Total New Mexico O&G GHG Emissions (MMT CO2e)	116.17	126.50	125.32	139.19	
Total PDO O&G GHG Emissions (MMT CO2e)	40.10	46.95	47.89	48.85	
Total FFO O&G GHG Emissions (MMT CO2e)	38.82	38.78	35.62	28.00	

*Data total for PDO, FFO includes data from both federal and mixed exploratory land classes.
Data not released for 2018 Gas Production on EIA website as of 10/15/2019

GHG emissions from O&G gas production in the BLM Oklahoma Field Office (OFO) planning area in 2014 was 40.10 MMT of CO2e, which is 1.43 percent of national O&G GHG emissions and 3.90 percent of TX,OK, and KS O&G GHG emissions combined (See Table 16 and footnote) from production in 2014. GHG end-use emissions from the BLM BLM OFO planning area has increased to 48.85 MMT/year of CO_2e in 2017.

Table 16. Historical Federal oil and gas production (OFO) Oklahoma, Kansas and Texas

Oil and Gas Production	2014	2015	2016	2017	2018
U.S. Oil Production (Mbbls)	3,196,889	3,442,188	3,232,025	3,413,376	4,011,521
Oklahoma Oil Production (Mbbls)	149,693	165,909	154,077	163,907	200,685
Oklahoma Federal Oil Production (Mbbls)	804	1,068	831	630	560
Texas Oil Production (Mbbls)	1,158,470	1,258,637	1,165,660	1,271,144	1,609,075
Texas Federal Oil Production (Mbbls)	265	270	259	422	822
Kansas Oil Production (Mbbls)	49,846	49,513	37,942	35,826	34,714
Kansas Federal Oil Production (Mbbls)	169	154	139	127	115
BLM OFO (Kansas, Oklahoma, Texas) Oil Production (Mbbls)*	1,239	1,492	1.230	1,179	1,497
U.S. Gas Production (MMcf)	25,889,605	27,065,460	26,592,115	27,291,222	30,438,588
Oklahoma Gas Production (MMcf)	1,851,159	2,161,221	2,336,191	2,293,872	*
Oklahoma Federal Gas Production (MMcf)	16,292	19,852	17,740	14,713	12,634
Texas Gas Production (MMcf)	7,178,225	7,080,338	6,406,450	6,300,292	*
Texas Federal Gas Production (MMcf)	39,391	33,955	33,315	30,655	27,344
Kansas Gas Production (MMcf)	269,965	269,128	226,890	195,859	*
Kansas Federal Gas Production (MMcf)	4,726	4,418	4,139	3,859	3,649
BLM OFO (Kansas, Oklahoma, Texas) Gas Production (MMcf)	60,409	58,225	55,194	49,227	43,627
GHG Emissions					
Total U.S. O&G GHG Emissions (MMT) CO2e	2791.29	2961.11	2844.84	2961.08	
Total OFO (Kansas, Oklahoma, Texas) O&G GHG Emissions (MMT CO2e)	40.10	46.95	47.89	48.85	

--Using emissions factors for oil and gas production; total combined end-use production GHGs from OK, KS and TX is 1,028.41 MMT/year (Calculation not shown).

*OFO Includes federal oil and gas activity for Oklahoma, Kansas and Texas.

*Data not released for 2018 Gas Production on EIA website as of 10/15/2019

10.5 GLOBAL, NATIONAL AND STATE GHG EMISSIONS

It is useful to compare the relative and absolute contributions to climate change of different GHG emissions, as well as emissions from different regions/countries or sources/sectors. There are several different metrics that can be used for this comparison. A GHG emission inventory is used to identify and quantify the anthropogenic GHG emissions from different regions/countries or sources/sectors. Using the GWP concept, GHG emissions are often reported in terms of carbon dioxide equivalent (CO_2e). The World Resources Institute's (WRI's) Climate Analysis Indicators Tool provides data on GHG emissions from 186 countries and all 50 states. In 1990 total global GHG emissions were 33,823 million metric tons of CO_2 equivalent (MMt CO_2 Eq.); In 2013, total global GHG emissions were 48,257 million metric tons of CO_2 equivalent (MMt CO_2 Eq.), including land-use change and forestry. From 1990 to 2013, global GHG emissions have increased at an annual rate of 3.3%. Electricity generation, manufacturing/construction, and transportation account for roughly 31%, 13%, and 15% of total global GHG emissions, respectively (World Resources Institute 2017).

To meet the obligations of the UNFCCC, the U.S. Environmental Protection Agency (EPA) publishes the national GHG emissions inventory on an annual basis (EPA 2019f). The lowest GHG emissions, since reporting, 6,371 MMT of CO2e, occurred in 1991 and the peak GHG emissions occurred about 16 years later in 2007, 7,379 MMT CO2e. The largest source of GHG emissions from human activities in the United States is from burning of fossil fuels for electricity, heat, and transportation. Total U.S. emissions have increased by 1.3 percent from 1990 to 2017. The latest national GHG emissions are for calendar year 2017, in which total gross U.S. GHG emissions were reported at 6,456.7 MMt of CO_2e (See Figure 14). Emissions decreased from 2016 to 2017 by 0.5 percent due in large to a decrease in fossil fuel combustion. Fossil fuel combustion decreases were a result of: (1) a continued shift from coal to natural gas, (2) increased use of renewable energy in the electric power sector; and (3) milder weather than contributed to less overall electricity use. Relative to 1990, the baseline for the inventory, gross emissions in 2017 are higher by 1.3 percent, down from a high of 15.7 percent above 1990 levels in 2007. Figure 14 illustrates U.S. GHG emissions (MMT/yr) by gas from 1990 through 2017 (EPA 2019f).

GHG emissions can be generated from a myriad of sources. The Inventory on Greenhouse Gas Emissions produced annually by the U.S. EPA categorizes these emissions by economic sector. These five major sector categories are transportation, electricity generation, industry, agriculture and commercial & residential.

- **Transportation-** GHG emissions are a result of burning fossil fuel for use in cars, trucks ships, trains, and planes.
- **Electricity Generation**- GHG emissions in this sector are primarily from fuel methods used to generate electricity; coal, natural gas, as well as other fuels.
- **Industry-** GHG emissions from the industry sector are the result of the burning of fossil fuels for energy as well as emissions from certain chemical reactions necessary to produce goods from raw materials.
- **Commercial and Residential-** These GHG emissions are primarily from fossil fuels burned for heat and the use of certain products that contain GHGs and the handling of waste.

- **Agriculture-** GHG emissions from this sector comes from livestock such as cows, agricultural soils, and rice production.

Table 17 further breaks down GHG emissions by major source category within each major greenhouse gas and shows GHG trends from 1990-2017.

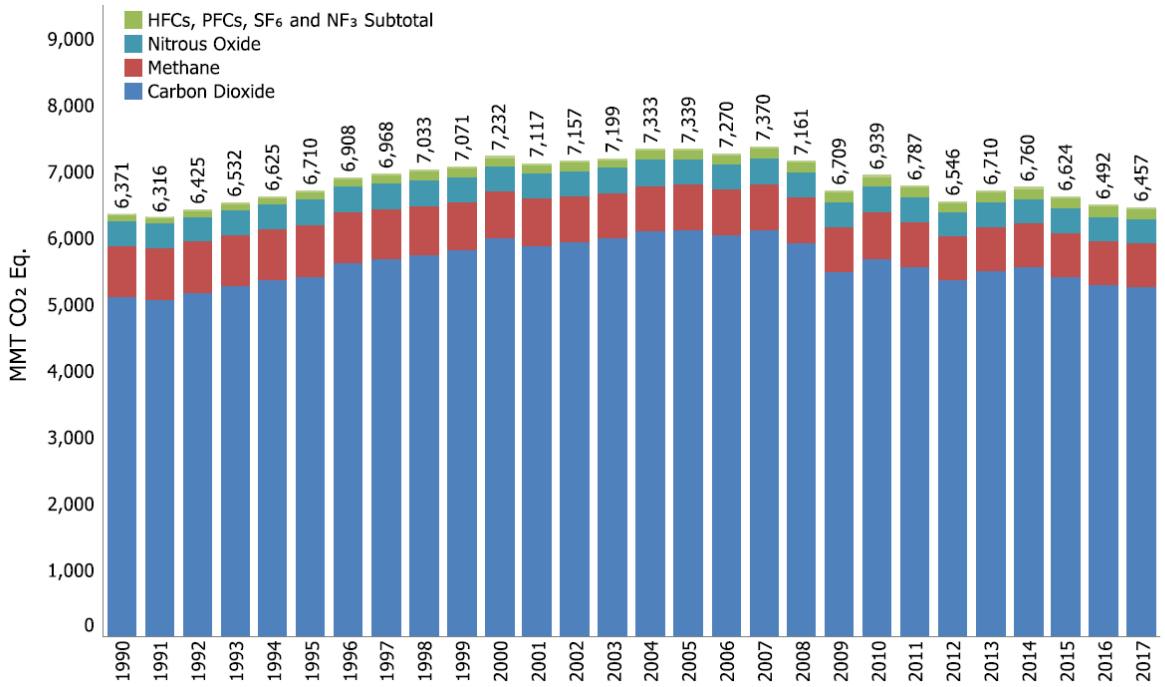


Figure 14. U.S. greenhouse gas (GHG) emissions by gas from 1990 to 2017 (EPA 2019f)

The gross emissions total presented in this report for the United States excludes emissions and removals from Land Use, Land-Use Change, and Forestry (LULUCF). The net emissions total presented in this report for the United States includes emissions and removals from LULUCF (See Table 17).

Within the CO_2 pollutant category there are 28 source categories reported in the inventory; the CH_4 pollutant category has 20 source categories and N_20 pollutant category has 16 source categories reported. Other pollutant categories reported in the annual inventory report include HFCs and PFCs (See Table 17). The largest source of GHG emission is attributed to CO_2 emissions is from Fossil Fuel Combustion (4,912 MMT of CO2); transportation (28%), electric power sector (27%), industrial (13%), residential (4.6%), and commercial (3.6%) of total GHG emissions for 2017 (6,456.7 MMT of CO2e) (EPA 2019f).

Table 17. Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO2 Eq.)

Gas/Source	1990	2005	2013	2014	2015	2016	2017
CO2	5121.2	6130.6	5522.9	5572.1	5423	5306.7	5270.7

Fossil Fuel Combustion	4738.8	5744.8	5157.4	5199.3	5047.1	4961.9	4912
Transportation	1469.1	1857	1682.7	1721.6	1734	1779	1800.6
Electric Power Sector	1820	2400	2038.3	2037.1	1900.6	1808.9	1732
Industrial	857.5	853.4	840	819.6	807.9	807.6	810.7
Residential	338.2	357.9	329.3	346.8	317.8	292.9	294.5
Commercial	226.5	226.8	224.6	232.9	245.5	232.1	232.9
U.S. Territories	27.6	49.7	42.5	41.4	41.4	41.4	41.4
Non-Energy Use of Fuels	119.6	139.6	123.5	119.9	126.9	113.7	123.2
Iron and Steel Production & Metallurgical Coke Production	101.6	68.2	53.5	58.4	47.8	42.3	41.8
Cement Production	33.5	46.2	36.4	39.4	39.9	39.4	40.3
Petrochemical Production	21.2	26.8	26.4	26.5	28.1	28.1	28.2
Natural Gas Systems	30	22.6	25.1	25.5	25.1	25.5	26.3
Petroleum Systems	9	11.6	25.1	29.6	31.7	22.2	23.3
Ammonia Production	13	9.2	9.5	9.4	10.6	10.8	13.2
Lime Production	11.7	14.6	14	14.2	13.3	12.9	13.1
Incineration of Waste	8	12.5	10.3	10.4	10.7	10.8	10.8
Other Process Uses of Carbonates	6.3	7.6	11.5	13	12.2	11	10.1
Urea Fertilization	2.4	3.5	4.4	4.5	4.7	4.9	5.1
Urea Consumption for Non-Agricultural Purposes	3.8	3.7	4.6	1.8	4.6	5.1	5
Carbon Dioxide Consumption	1.5	1.4	4.2	4.5	4.5	4.5	4.5
Liming	4.7	4.3	3.9	3.6	3.7	3.2	3.2
Ferroalloy Production	2.2	1.4	1.8	1.9	2	1.8	2
Soda Ash Production	1.4	1.7	1.7	1.7	1.7	1.7	1.8
Titanium Dioxide Production	1.2	1.8	1.7	1.7	1.6	1.7	1.7
Glass Production	1.5	1.9	1.3	1.3	1.3	1.2	1.3

Aluminum Production	6.8	4.1	3.3	2.8	2.8	1.3	1.2
Phosphoric Acid Production	1.5	1.3	1.1	1	1	1	1
Zinc Production	0.6	1	1.4	1	0.9	0.9	1
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.5
Silicon Carbide Production and Consumption	0.4	0.2	0.2	0.2	0.2	0.2	0.2
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Magnesium Production and Processing	+	+	+	+	+	+	+
Wood Biomass, Ethanol, and Biodiesel Consumption[a]	219.4	230.7	315.5	323.2	317.7	317.2	322.2
International Bunker Fuels[b]	103.5	113.1	99.8	103.4	110.9	116.6	120.1
CH4c	779.8	691.4	663	662.1	661.4	654.9	656.3
Enteric Fermentation	164.2	168.9	165.5	164.2	166.5	171.9	175.4
Natural Gas Systems	193.1	171.4	165.6	165.1	167.2	165.7	165.6
Landfills	179.6	131.4	112.9	112.5	111.2	108	107.7
Manure Management	37.1	53.7	58.1	57.8	60.9	61.5	61.7
Coal Mining	96.5	64.1	64.6	64.6	61.2	53.8	55.7
Petroleum Systems	42.1	36.7	41.6	42.1	39.5	38.2	37.7
Wastewater Treatment	15.3	15.4	14.3	14.3	14.5	14.2	14.2
Rice Cultivation	16	16.7	11.5	12.7	12.3	13.7	11.3
Stationary Combustion	8.6	7.8	8.7	8.9	8.5	7.9	7.8
Abandoned Oil and Gas Wells	6.6	6.9	7	7.1	7.1	7.2	6.9
Abandoned Underground Coal Mines	7.2	6.6	6.2	6.3	6.4	6.7	6.4
Mobile Combustion	12.9	9.6	4.5	4.1	3.6	3.4	3.2
Composting	0.4	1.9	2	2.1	2.1	2.1	2.2
Petrochemical Production	0.2	0.1	0.1	0.1	0.2	0.2	0.3

Field Burning of Agricultural Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Ferroalloy Production	+	+	+	+	+	+	+
Silicon Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	+	+	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	0.2	0.1	0.1	0.1	0.1	0.1	0.1
N2Oc	370.3	375.8	365.4	362.7	374.1	364.5	360.5
Agricultural Soil Management	251.7	254.5	265.2	262.3	277.8	267.6	266.4
Stationary Combustion	25.1	34.3	32.7	33	30.6	30.1	28.6
Manure Management	14	16.5	17.4	17.4	17.6	18.2	18.7
Mobile Combustion	42	39	22.1	20.2	18.8	17.9	16.9
Nitric Acid Production	12.1	11.3	10.7	10.9	11.6	10.1	9.3
Adipic Acid Production	15.2	7.1	3.9	5.4	4.3	7	7.4
Wastewater Treatment	3.4	4.4	4.7	4.8	4.8	4.9	5
N2O from Product Uses	4.2	4.2	4.2	4.2	4.2	4.2	4.2
Composting	0.3	1.7	1.8	1.9	1.9	1.9	1.9
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.7	2.1	2	2	2	2	1.4
Incineration of Waste	0.5	0.4	0.3	0.3	0.3	0.3	0.3
Semiconductor Manufacture	+	0.1	0.2	0.2	0.2	0.2	0.2
Field Burning of Agricultural Residues	+	0.1	0.1	0.1	0.1	0.1	0.1
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels[b]	0.9	1	0.9	0.9	0.9	1	1

HFCs	46.6	122.3	146.1	150.7	153.8	155	158.3
Substitution of Ozone Depleting Substances[d]	0.3	102.1	141.7	145.2	149.2	151.7	152.7
HCFC-22 Production	46.1	20	4.1	5	4.3	2.8	5.2
Semiconductor Manufacture	0.2	0.2	0.3	0.3	0.3	0.3	0.4
Magnesium Production and Processing	0	0	0.1	0.1	0.1	0.1	0.1
PFCs	24.3	6.7	5.9	5.6	5.1	4.4	4.1
Semiconductor Manufacture	2.8	3.2	2.9	3.1	3.1	3	3
Aluminum Production	21.5	3.4	3	2.5	2	1.4	1.1
Substitution of Ozone Depleting Substances[d]	0	+	+	+	+	+	+
SF6	28.8	11.8	6.3	6.3	5.8	6.3	6.1
Electrical Transmission and Distribution	23.1	8.3	4.4	4.6	4.1	4.4	4.3
Magnesium Production and Processing	5.2	2.7	1.3	0.9	1	1.1	1.1
Semiconductor Manufacture	0.5	0.7	0.7	0.7	0.7	0.9	0.7
NF3	+	0.5	0.5	0.5	0.6	0.6	0.6
Semiconductor Manufacture	+	0.5	0.5	0.5	0.6	0.6	0.6
Total Emissions	6371	7339	6710.2	6760	6623.8	6492.3	6456.7
LULUCF Emissions[c]	7.8	16	17.5	17.7	28.3	15.5	15.5
LULUCF CH4 Emissions	5	9	9.9	10.1	16.5	8.8	8.8
LULUCF N2O Emissions	2.8	7	7.6	7.7	11.8	6.7	6.7
LULUCF Carbon Stock Change[e]	-814.8	-756.1	-731	-687.8	-739.4	-738.1	-729.6
LULUCF Sector Net Total[f]	-807	-740	-713.5	-670	-711.1	-722.6	-714.1
Net Emissions (Sources and Sinks)	5564	6599	5996.8	6090	5912.7	5769.7	5742.6

Data obtained from Table ES-2 of US Inventory of Greenhouse Gases and Sinks (EPA 2019f).

Notes: Total emissions presented without LULUCF. Net emissions presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.
+Does not exceed 0.05 MMT CO2 Eq.
a Emissions from Wood Biomass, Ethanol, and Biodiesel Consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.
b Emissions from International Bunker Fuels are not included in totals.
c LULUCF emissions of CH4 and N2O are reported separately from gross emissions totals. LULUCF emissions include the CH4, and N2O emissions from Peatlands Remaining Peatlands; CH4 and N2O emissions reported for Non-CO2 Emissions from Forest Fires, Non-CO2 Emissions from Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH4 emissions from Land Converted to Coastal Wetlands; and N2O emissions from Forest Soils and Settlement Soils.
d Small amounts of PFC emissions also result from this source.
e LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.
f The LULUCF Sector Net Total is the net sum of all CH4 and N2O emissions to the atmosphere plus net carbon stock changes.

10.6 NATURAL GAS SYSTEMS AND PETROLEUM SYSTEMS

Within the fossil fuel combustion sector the contribution by fuel type shows that petroleum represents 44.7% of the fuel type, natural gas 29.5% and finally coal is 25.8% (Figure 15).

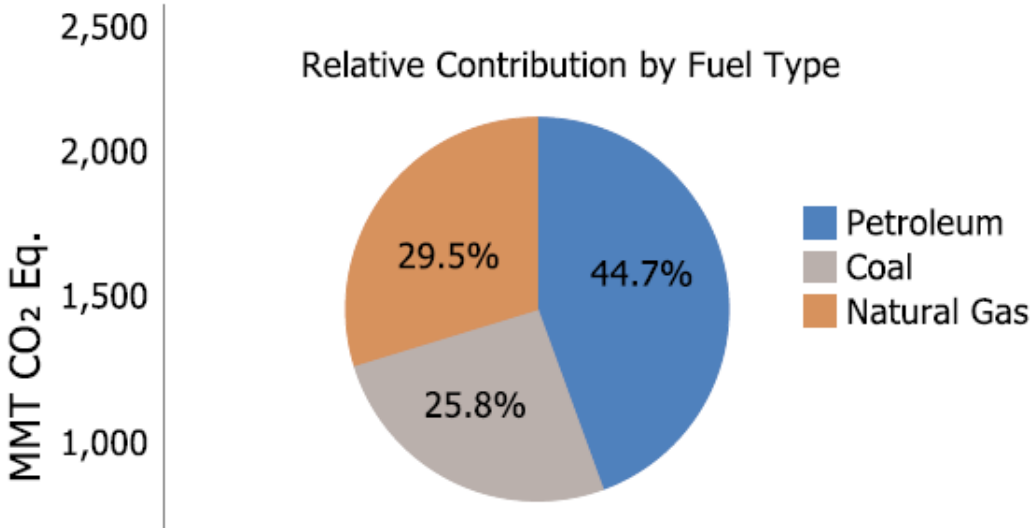


Figure 15. 2017 CO2 Emissions from Fossil Fuel Combustion by Sector and Fuel Type (MMT CO2 Eq.)

The EPA's national GHG emissions inventory describes "Natural Gas Systems" and "Petroleum Systems" as two of the major sources of U.S. GHG emissions. The inventory identifies the contributions of natural gas and petroleum systems to total carbon dioxide (CO_2) and methane (CH_4) emissions. Natural gas and petroleum systems do not produce noteworthy amounts of any other GHGs.

Natural gas systems were the second largest anthropogenic source category of CH4 emissions in the United States in 2017 with 165.6 MMT CO2 Eq. of methane (CH4) emitted into the atmosphere. Natural gas systems methane (CH4) emissions decreased by 27.5 MMT CO2 Eq. (14.2 percent) since 1990, largely due to a decrease in emissions from distribution, transmission and storage, processing, and

exploration. The decrease in distribution is largely due to decreased emissions from pipelines and distribution station leaks, and the decrease in transmission and storage emissions is largely due to reduced compressor station emissions (including emissions from compressors and leaks). Petroleum systems methane (CH4) emissions decreased by 4.4 MMT CO2 Eq. (or 10.5 percent) since 1990. This decrease is due primarily to decreases in tank emissions and associated gas venting.

Within the category of "Natural Gas Systems", the EPA identifies emissions occurring during distinct stages of operation, including field production, processing, transmission and storage, and distribution. Petroleum Systems" sub-activities include production field operations, crude oil transportation and crude oil refining. Within the Natural Gas Systems and Petroleum Systems the BLM has authority to regulate those field production operations that are related to oil and gas measurement and prevention of waste (via leaks, spills and unauthorized flaring and venting).

For natural gas, extraction accounts for 55% of total life cycle CO_2e emissions, processing accounts for 27% and transmission accounts for 18% of life cycle CO_2e emissions (U.S. Department of Energy 2011). For oil, drilling and development is responsible for 8% of the total life cycle CO_2e emissions, whereas transportation of the petroleum to refineries represents about 10% of the emissions, and final consumption as transportation fuel represents fully 80% of emissions (U.S. Department of Energy 2008).

Table 18 displays GHG emissions (CO_2, CH_4 and N_20) related to natural gas systems, petroleum systems as well as coal mining. In Table 18, CO_2 emissions listed represent non-combustion CO_2 emissions. The natural gas and petroleum subsectors that BLM regulates for onshore operations on federal mineral estate are highlighted in gray.

Table 18. 2017 Greenhouse Gas Emissions for Oil and Gas subsectors and Coal Mining (EPA 2019f)

Sector	Subsector	2017 GHG Emissions ($MMTCO_2e$)				% of U.S. Total GHGs
		CO_2	CH_4	N_20	Total GHGs	
Natural Gas Systems	Total	26.3	165.6	0.005	191.9	2.97%
	Exploration	0.5	1.2	0.0003	1.7	
	Production Field Operations	2.8	108.4	0.001	111.2	1.73%
	Onshore Production		45.1			

	Offshore Production		3.8			
	Gathering and Boosting		59.5			
	Processing	22.5	11.7	0.003	34.2	0.53%
	Transmission and storage	0.5	32.4	*	32.9	0.51%
	Distribution	*	11.9	Not occurring	0.18	0.48%
Petroleum Systems	Total	23.4	37.7	0.024	54.6	0.85%
	Exploration	1.7	0.4	0.0008	2.10	0.03%
	Production field operations	18.0	36.4	0.012	54.4	0.84%
	Crude oil transportation	**	0.2	*	0.2	0.003%
	Crude refining	3.7	0.7	0.011	4.41	0.07%
Coal Mining	--	*	60.9	*	60.9	0.94%
U.S. Total		5,270.7	656.3	360.5	6456.7 ***	100%

*Indicates values less than 0.1 TgCO2e

**Indicates values that do not exceed 0.05 TgCO2e

***Indicates that the total U.S. GHG emissions value includes U.S. emissions of three additional minor classes of GHGs not listed here.

For Natural Gas Systems Source is Table 3-64, 3-67, 3-69 from 2017 Inventory Data (EPA, 2019f)

a These values represent CH4 emitted to the atmosphere. CH4 that is captured, flared, or otherwise controlled (and not emitted to the atmosphere) has been calculated and removed from emission totals.
b Exploration includes well drilling, testing, and completions.
c Gathering and boosting includes gathering and boosting station routine vented and leak sources, gathering pipeline leaks and blowdowns, and gathering and boosting station episodic events.

+Includes Onshore 45.1 MMT, Offshore 3.8MMT, and gathering and boosting 59.5MMT

With respect to GHGs emitted by oil and gas development, carbon dioxide (CO_2) is produced during the burning of fossil fuels to run internal combustion engines which may be used in drilling, transportation, pumping and compression. Carbon dioxide may be a significant component of natural gas, especially coalbed methane, and is vented during field operations or processing. Carbon dioxide is also used in enhanced oil production processes and may be released or escape to the atmosphere during those processes. Methane (CH_4) is the primary component of natural gas and is released to the atmosphere during both oil and gas production either intentionally during production when it cannot be captured, or accidentally through leaks and fugitive emissions.

10.6.1 TRENDS

Globally, emissions of CO_2 from flaring of unused gas during oil production decreased by about a quarter between 2003 and 2011; however, flaring emissions for the U.S. are on the rise and increased by 50% in 2011 because of the significant increase in fracking for shale oil production and the flaring of co-produced natural gas (Olivier 2012). Carbon dioxide emissions from natural gas and petroleum systems increased by 27 percent from 1990 to 2017, due to increases in flaring emissions.

10.7 NATIONAL GHG EMISSIONS GHGRP (FLIGHT)

The Greenhouse Gas Reporting Program (GHGRP) is codified by regulation, (40 CFR 98) and requires reporting of greenhouse gas data and other relevant information from large GHG emission sources, fuel and industrial gas suppliers, and CO_2 injection sites in the United States. There is a total of 41 categories covered by the program. Facilities are generally required to submit annual reports under Part 98 if:

- GHG emissions from covered sources exceed 25,000 metric tons CO_2e per year.
- Supply of certain products would result in over 25,000 metric tons CO_2e of GHG emissions if those products were released, combusted, or oxidized.
- The facility receives 25,000 metric tons or more of CO_2 for underground injection.

The reported data are usually made available to the public in October of each year. It should be noted that the GHGRP does not represent total U.S. GHG emissions, but provides facility level data for large sources of direct emissions, thus representing the majority of U.S. GHG emissions. The GHGRP data collected from direct emitters represent about half of all U.S. emissions. When including greenhouse gas information reported to the GHGRP by suppliers, emissions coverage reaches approximately 85–90%. The *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2017* contains information on all GHG

emissions sources and sinks in the United States. For more information please visit the US Greenhouse Gas Reporting Program (GHGRP) https://www.epa.gov/ghgreporting.

10.7.1 COMPRESSOR ENGINES AND STATIONS (MIDSTREAM) REPORTED GHG EMISSIONS

Compressor engines link the natural gas pipeline infrastructure that transports natural gas from its source to points of consumption. Table 19 shows the greenhouse gas emissions from compressor stations and gas plants for each BLN NM state from the 2018 Greenhouse Gas Facility Level Information on Greenhouse Gases Tool (FLIGHT). Some gas plants and compressor stations' emissions may not be reported to FLIGHT because emissions from the plant or station do not exceed EPA's GHG reporting threshold.

Table 19. 2018 Midstream Greenhouse gas emissions from gas plants and compressor stations (EPA 2019e)

State	Number of reporting compressor stations	Total GHG emissions from reporting compressor stations (MMT CO_2e)	**%U.S. Total reported Compressor Station GHG Emissions**	Number of reporting gas plants	Total GHG emissions from reporting gas plants (MMT CO_2e)	**%U.S. Total reported Gas Plant GHG Emissions**
New Mexico	8	0.37	1.32	24	4.5	7.89
Texas	61	2.8	10.0	205	21.0	36.8
Oklahoma	18	0.68	2.43	50	3.3	5.79
Kansas	22	1.2	5.29	5	1.00	1.75

Emissions from natural gas processing, transmission/compression, transmission pipelines, distribution and storage and distribution in the U.S. totaled 102 million metric tons of CO_2e in 2018, which was about 1.58% of total U.S. GHG emissions reported to EPA in 2017 (EPA 2019e).

10.7.2 REFINERIES (MIDSTREAM) REPORTED GHG EMISSIONS

Crude oil produced throughout the BLM-NM area is transported by pipeline and/or tanker truck to refineries where the oil is processed into various types of fuel. Table 20 shows the greenhouse gas emissions from refineries in each BLM-NM state.

Table 20. 2018 Greenhouse gas emissions from refineries (EPA 2019e)

State	Number of Reporting Refineries	Total GHG emissions from reporting compressor stations (MMT CO_2e)	**%U.S. Total reported Refinery GHG Emissions**
New Mexico	3	1.1	0.61
Texas	29	56.0	30.94
Oklahoma	5	4.5	2.49
Kansas	3	3.0	1.66

There are three refineries New Mexico, one in Jameston (Gallup Refinery), one in Artesia and one in Lovington. In Kansas, there are three refineries, Oklahoma has five refineries and Texas has twenty-nine refineries. Transportation and processing of crude oil and petroleum products result in emissions of various hazardous air pollutants, criteria pollutants, and GHGs. In 2018, greenhouse gas emissions from refineries (total of 141 reporting) accounted for 181 million metric tons CO_2e emitted which is 5.6% of the total GHG emissions reported to EPA (EPA 2019e).

10.7.3 STATE GHGS

The predicted greenhouse gas emissions are compared to the baseline statewide greenhouse gas emissions as reported in the Inventory of New Mexico Greenhouse Gas Emissions: 2000-2013 NMED. 2016). The Inventory of New Mexico Greenhouse Gas Emissions: 2000-2013 lists total statewide gross GHG emissions in 2013 as 80.9 MMt CO_2 Eq. For 2013, New Mexico's Environment Department reported that the primary contributors to the state's GHG emissions were electricity generation (35%), the fossil fuel industry (26%), and transportation (17%) (NMED 2016). In 2012, WRI's CAIT reports that New Mexico's GHG emissions were 75.5 MMt CO_2 Eq. (World Resources Institute 2017). Electricity generation, transportation, and fugitive sources account for around 29%, 14%, and 11% of New Mexico's GHG emissions in 2012 (World Resources Institute 2017).

The New Mexico Greenhouse Gas Inventory and Reference Case Projection 1990-2020 estimates that approximately 17.3 million metric tons of GHGs from the natural gas industry and 2.3 million metric tons of GHGs from the oil industry were projected in 2010 as a result of oil and natural gas production, processing, transmission and distribution. According to the New Mexico Greenhouse Gas Inventory and Reference Case Projections, 1990-2020, GHG emissions were expected to continue increasing (NMED

2006). From 1990 to 2012, New Mexico's GHG emissions have decreased at an annual rate of 0.45% (NMED 2016).

10.7.4 OTHER MAJOR INDUSTRIES GENERATING GHG EMISSIONS

Potash mining is another major industry in the CFO area. There are two mining companies operating 4 potash processing plants in the CFO area. Potash production produces emissions of various hazardous air pollutants, criteria pollutants as well as GHGs. In 2015, potash mines in southeastern New Mexico emitted 97,140 metric tons of CO_2e cumulatively. This is 0.002% of total U.S. greenhouse gas emissions (EPA 2019f). In 2016 CO2e emissions decreased significantly as some facilities discontinued reporting into the GHG emissions for valid reasons, thus in 2018 the emissions from Intrepid Potash reported only 8,408 metric tons of CO2e; which is 0.0001% of total U.S. greenhouse gas emissions.

Coal mining is another major industry in San Juan County. Westmoreland purchased the San Juan Mine from BHP Billiton and began ownership 2016. BHP also transferred ownership of the Navajo Mine, located near Fruitland NM to the Navajo Transitional Energy Co. (NATEC) at the end of 2016. The San Juan Mine provides coal to the San Juan Generating Station and the Navajo Mine provides coal to the Four Corners Power Plant. Coal production produces emissions of various hazardous air pollutants, criteria pollutants, and GHGs. In 2018, the San Juan Mine reported 0.57 million metric tons of CO2e while data for the Navajo Mine was not available. In 2017, coal mining in the U.S. contributed 55.7 million metric tons CO_2e, from CH4 which is 8.49% of total U.S. CH_4 emissions, and 0.87% of total U.S. GHG emissions (See Table 18).

11 CUMULATIVE GHG EMISSIONS

11.1 UNITED STATES GEOLOGICAL SURVEY (USGS) END-USE & EXTRACTION ANALYSIS

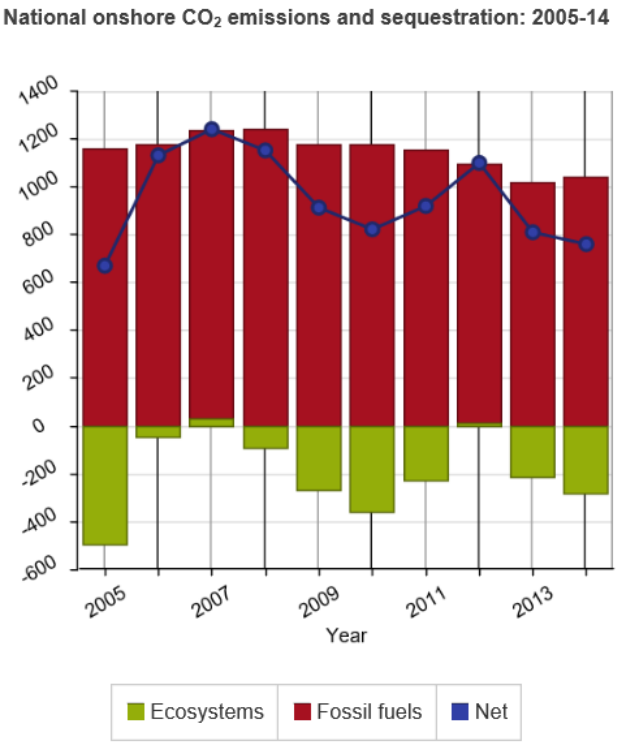
In November of 2018, the USGS published a scientific investigation report, *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates 2005-2014* (Merrill et al 2018). The report consists of a 44-page document with four companion datasets and an interactive online mapping site in which the user can pull up data for each state (28 states included in analysis) and two offshore sites. The data itself consists of 10 years of emissions and sequestration estimates in which the emissions from combustion and extraction activities on federal lands from fossil fuels is converted into carbon dioxide equivalents (CO_2e) and measured in million metric tons/year of CO_2e. The estimates include the three most prominent greenhouse gases (GHGs): carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). The results are presented by state and year and the estimates are broken into categories by the sector of the economy where the combustion or extraction related emissions occurred or the biologic process being quantified occurred. The data presents both gross and net emissions after sequestration is accounted for. For the purpose of this analysis the BLM quantifies all emissions in CO_2 equivalents (CO_2e). For context of gross and net emissions as well as sequestration activities, the BLM shows the total U.S. and New Mexico emissions from combustion and extraction activities on federal lands as well as sequestration activity (Figures 16 and 17). American Indian and Tribal lands were not

included in the analysis. Additionally, the national total (gross) emissions includes two offshore areas (Merrill et al 2018).

11.1.1 GHG EMISSIONS (COMBUSTION AND EXTRACTION) FROM U.S. FEDERAL LANDS (CO2E)

In 2014, end-use combustion & extraction (C&E) of fossil fuels produced on U.S. federal lands was 1,332 million metric tons (MMT) of carbon dioxide equivalent (CO_2e). This reported value includes emissions from the combustion of coal, oil and natural gas from fossil fuels produced on U.S. federal lands as well as extraction emissions from activities occurring on federal lands. When compared to 2005 emissions, this results in a decrease of emissions throughout all the three prominent GHG emissions. From 2005-2014 GHG emissions from end-use C&E of fossil fuels produced on federal lands have resulted in an overall trend of decreased emissions (Figure 16). When compared to global and national total CO_2e emissions, 48,257 and 6,456.7 MMT respectively, from all sources (Table 21), CO2e emissions from these activities (end-use combustion and extraction activities) of fossil fuels produced on federal lands is 2.8% and 19.4% respectively (World Resources Institute 2007 & EPA 2019f). Of the 1,332 MMT CO2e, 80.53 MMT were exported end-use combustion emissions, 752.50 MMT represented emissions from coal sources while 498.76 MMT were the result of oil and natural gas source. Figures 18 & 19 provide a graphical representation of CO_2e emissions from the fossil fuels produced on U.S. federal lands associated with end-use combustion and extraction activities.

U.S. federal lands also contribute a great deal to the sequestration of CO_2 and provide carbon storage (sinks) for CO_2 emissions. In 2014 U.S. federal lands provided 283.2 MMT of carbon storage. U.S. federal lands sequestered an average of 195 MMT of CO2e between 2005 and 2014 offsetting approximately 15 percent of the CO_2 emissions resulting from the extraction of fossil fuels on Federal lands and their end-use combustion (Figure 16) (Merrill et al 2018).

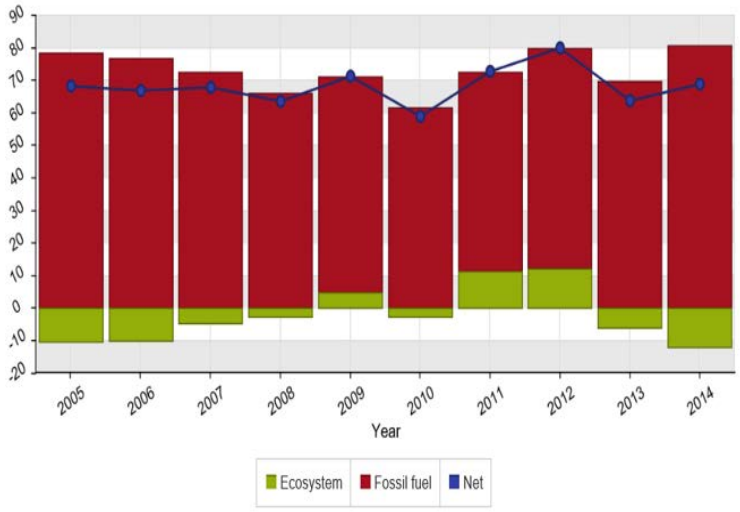


Year	Total fossil fuels	Onshore fossil fuels	Onshore ecosystems	Onshore net
2005	1,361.9	1,162.3	-493.5	668.8
2006	1,378.6	1,178.1	-47.4	1,130.7
2007	1,398.3	1,207.3	32.7	1,240.0
2008	1,427.9	1,243.7	-92.3	1,151.4
2009	1,422.5	1,178.5	-266.6	911.9
2010	1,429.4	1,180.6	-359.5	821.1
2011	1,362.4	1,156.2	-237.5	918.7
2012	1,280.5	1,085.8	13.0	1,098.8
2013	1,210.5	1,022.3	-213.6	808.7
2014	1,279.0	1,042.2	-283.2	759.0

Figure 16. National CO2 emissions and sequestration: 2005-2014

Figure provided from (USGS. Merrill et al 2018).**Values may not sum to reported totals due to rounding.*

All values are in million metric tons of CO_2 equivalent (MMT CO_2 Eq.) Total fossil fuels includes offshore emissions from two areas.



Year	Gross Fossil Fuels CO_2, CH_4 and N_2O	Onshore ecosystems	Net Fossil Fuels
2005	91.40	-10.5	80.9
2006	89.48	-10.2	79.28
2007	84.36	-4.8	79.56
2008	78.94	-2.8	76.14
2009	78.65	4.7	83.35
2010	73.74	-2.9	70.84
2011	72.44	11.1	83.54
2012	78.18	12	90.18
2013	80.68	-6.1	74.58
2014	91.63	-12	79.63

Figure 17. New Mexico CO2 emissions and sequestration: 2005-2014

Source: Merrill et al 2018 **Values may not sum to reported totals due to rounding. All values are in million metric tons of CO_2 equivalent (MMT CO_2 Eq.)*

While the USGS total values include GHG emissions from end-use combustion and from extraction activities of coal, oil and gas, in this section the BLM focuses on the end-use combustion emissions generated from the oil and natural gas sector, the BLM excludes coal totals (Table 21 and Figure 19).

Table 21. GHG Emissions, Combustion and Extraction, from U.S. Federal Lands (CO2e) (World Resources Institute 2017, EPA 2019a, Merrill et al 2018)

Level/Sector	MMT CO2e
Global emissions, All sources	48,257
National emissions, All sources*	6456.7
End-use C&E Emissions (federal lands)[1, 2]	1,332
% End-use C&E Emissions (federal lands) to Global Emissions[2]	2.76
% End-use C&E Emissions (federal lands) to National Emissions[2]	19.39
End-Use Combustion only Emissions (federal lands)[2]	1,201
% End-use Combustion only Emissions (federal lands) to Global Emissions[2]	2.49
% End-use Combustion only Emissions (federal lands) to National Emissions[2]	17.48
Extraction only Emissions (federal lands)[2]	50.52
% of Extraction only Emissions (federal lands) to Global Emissions[2]	0.10

% of Extraction only Emissions (federal lands) to National Emissions[2]	0.74
End-use C&E Emissions (federal lands) O&G only [3]	499
% End-use C&E Emissions (federal lands) O&G only to Global Emissions[3]	1.03
% End-use C&E Emissions (federal lands) O&G only to National Emissions[3]	7.26
End-Use Combustion only Emissions (federal lands) O&G only[3]	460
% End-use Combustion only Emissions (federal lands) O&G only to Global Emissions[3]	0.95
% End-use Combustion only Emissions (federal lands) O&G only to National Emissions[3]	6.70
Extraction only Emissions (federal lands) O&G only[3]	38.76
% Extraction only Emissions (federal lands) O&G only to Global Emissions[3]	0.08
% Extraction only Emissions (federal lands) O&G only to National Emissions[3]	0.56

1 Includes 80.53 MMT of exported CO_2e emissions. Emission totals are: CO_2 1,290 MMT, CH4 47.6 MMT of CO_2e, N2O 5.5 MMT of CO_2e
2 Includes emissions from coal, oil and natural gas
3 Isolates coal from the total and only includes oil and natural gas CO_2e emissions
C&E=Combustion and Extraction
Global emissions represented are for 2013, national emissions and federal land emissions are for 2014.
O&G=Oil and Gas
*Emissions reflect data from 2017 EPA GHG Inventory report, newer inventories may correct this value somewhat.

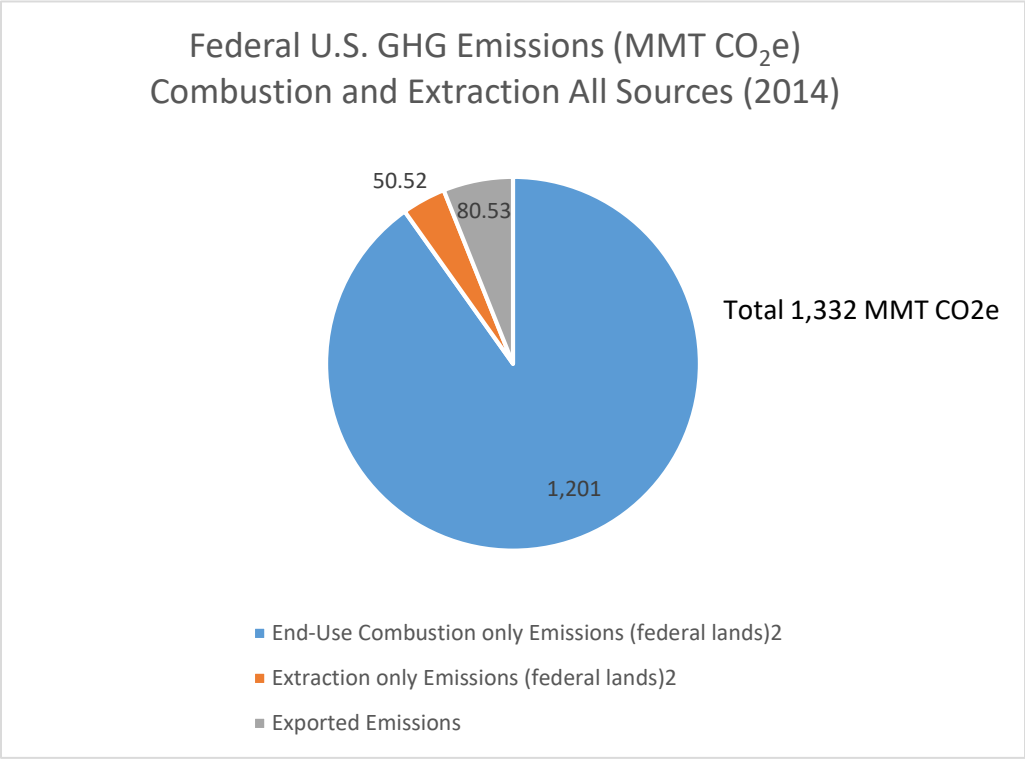


Figure 18. Federal U.S. GHG Emissions (MMT CO2e) Combustion and Extraction All Sources (2014)
***Description for legend numbers is included above in Table 21.**

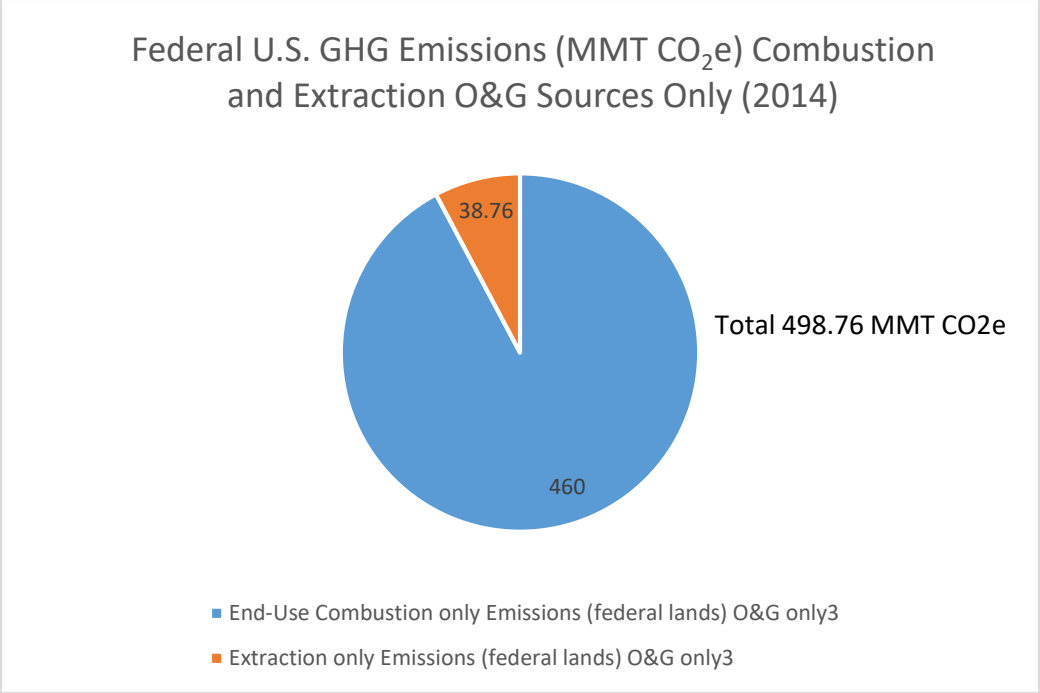


Figure 19. Federal U.S. GHG Emissions (MMT CO2e) Combustion and Extraction O&G Sources Only (2014)
***Description for legend numbers is included above in Table 21.**

11.1.2 GHG EMISSIONS (COMBUSTION AND EXTRACTION) FROM NEW MEXICO FEDERAL LANDS (CO2E)

In 2014, end-use combustion & extraction (C&E) of fossil fuels produced on New Mexico federal lands was 91.63 (MMT) of carbon dioxide equivalent (CO_2e). This reported value includes emissions from the combustion of coal, oil and natural gas from fossil fuels produced on federal lands as well as extraction emissions from activities occurring on federal lands. When compared to 2005 emissions this results in increased emissions throughout all the three prominent GHG emissions. From 2005-2014 GHG emissions from end-use C&E of fossil fuels produced on federal lands have resulted in average annual emissions of 81.95 MMT of CO_2e (Figure 17). When compared to global and national total CO_2e emissions, 48,257 and 6,456.7 MMT respectively, from all sources (Table 22), CO_2e emissions from these activities (end-use combustion and extraction activities) of fossil fuels produced on New Mexico federal lands is 0.19% and 1.33% respectively (World Resources Institute 2017 & EPA 2019f).

In 2014 New Mexico federal lands provided 12 MMT of carbon storage. Federal lands sequestered an average of 9.5 MMT of CO_2e between 2005 and 2014 (Figure 17) (Merrill et al, 2018). While the USGS total values include GHG emissions from end-use combustion and from extraction activities of coal, oil and gas, for the purposes of this analysis the BLM only focuses on the end-use combustion emissions generated from the oil and natural gas sector, the BLM exclude coal totals (Table 22 and Figure 21).

Table 22. GHG Emissions, Combustion and Extraction, from BLM New Mexico (CO2e) (World Resources Institute 2017, EPA 2019f, Merrill et al 2018)

Level/Sector	MMT CO2e
Global emissions, All sources	48,257
National emissions, All sources*	6456.7
End-use C&E Emissions (BLM NM)[1, 2]	91.63
% End-use C&E Emissions (BLM NM) to Global Emissions[2]	0.19
% End-use C&E Emissions (BLM NM) to National Emissions[2]	1.33
End-Use Combustion only Emissions (BLM NM)[2]	73
% End-use Combustion only Emissions (BLM NM) to Global Emissions[2]	0.15
% End-use Combustion only Emissions (BLM NM) to National Emissions[2]	1.06
Extraction only Emissions (BLM NM)[2]	12.76
% of Extraction only Emissions (BLM NM) to Global Emissions[2]	0.03
% of Extraction only Emissions (BLM NM) to National Emissions[2]	0.19
End-use C&E Emissions (BLM NM) O&G only [3]	66.35
% End-use C&E Emissions (BLM NM) O&G only to Global Emissions[3]	0.14
% End-use C&E Emissions (BLM NM) O&G only to National Emissions[3]	0.97
End-Use Combustion only Emissions (BLM NM) O&G only[3]	54.58
% End-use Combustion only Emissions (BLM NM) O&G only to Global Emissions[3]	0.11
% End-use Combustion only Emissions (BLM NM) O&G only to National Emissions[3]	0.79
Extraction only Emissions (BLM NM) O&G only[3]	11.77
% Extraction only Emissions (BLM NM) O&G only to Global Emissions[3]	0.02
% Extraction only Emissions (BLM NM) O&G only to National Emissions[3]	0.17

1 Includes 5.86 MMT of exported CO_2e emissions. Emission totals are: CO_2 74.78 MMT, CH4 10.78 MMT of CO_2e, N2O 0.22 MMT of CO_2e

2 Includes emissions from coal, oil and natural gas

3 Isolates coal from the total and only includes oil and natural gas CO_2e emissions

C&E=Combustion and Extraction

Global and state-wide emissions represented are for 2013, national emissions and federal land emissions are for 2014.

O&G=Oil and Gas

*Emissions reflect data from 2017 EPA GHG Inventory report, newer inventories may correct this value somewhat.

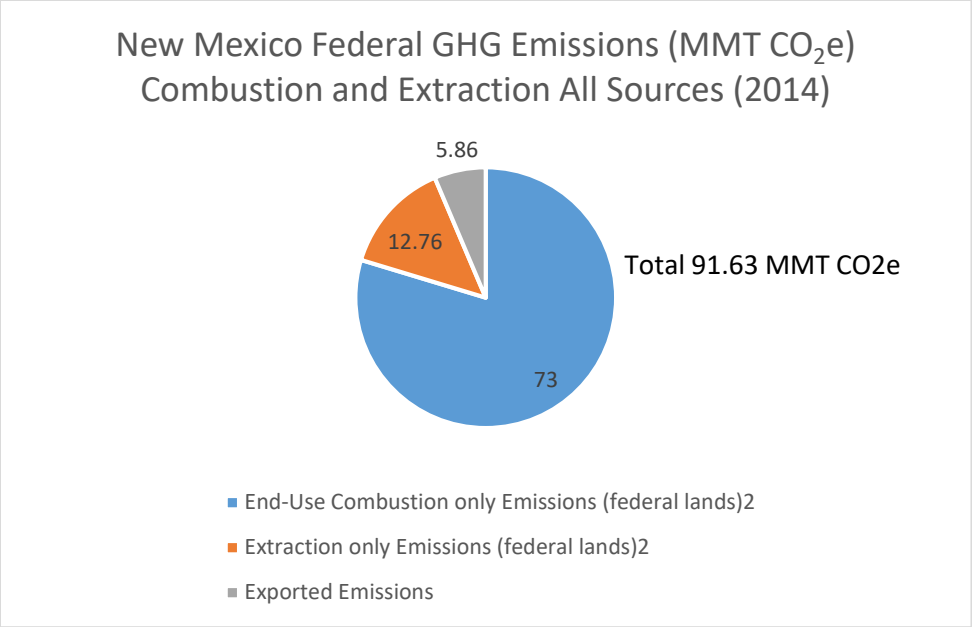


Figure 20. New Mexico Federal GHG Emissions (MMT CO2e) Combustion and Extraction All Sources (2014)
***Description for legend numbers is included above in Table 21.**

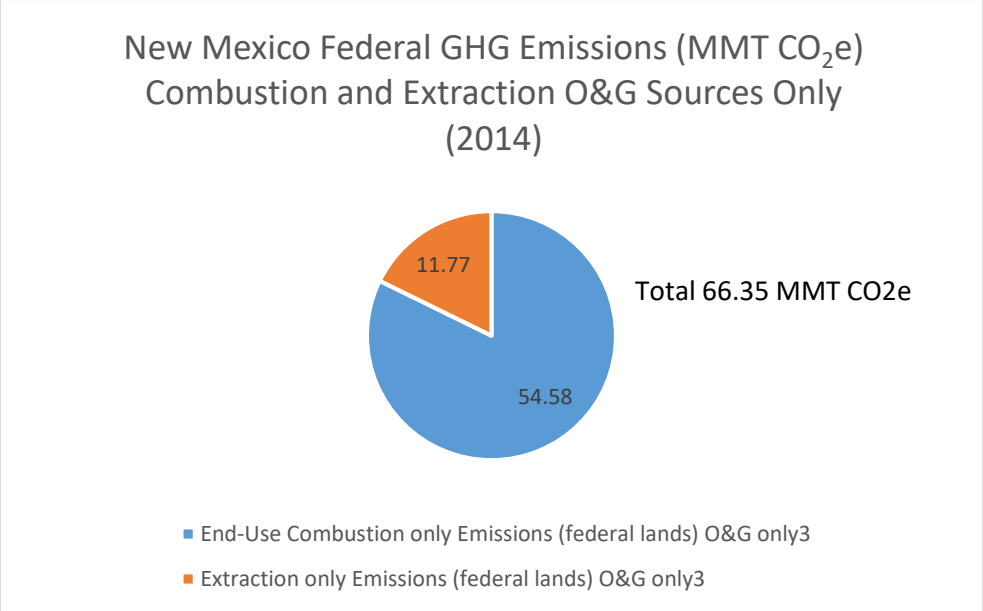


Figure 21. New Mexico Federal GHG Emissions (MMT CO2e) Combustion and Extraction O&G Sources Only (2014)

***Description for legend numbers is included above in Table 21.**

11.2 BLM GREENHOUSE GAS AND CLIMATE CHANGE REPORT

In 2017, BLM developed a *Greenhouse Gas (GHG) and Climate Change Report* and calculator tool with an energy focus (Golder Associates 2017). The report calculates GHG emissions associated with production

and consumption activities related to coal, oil, natural gas and natural gas liquids. The baseline year is 2014 and forecasts production/consumption GHG emissions for 2020 and 2030 for federal and non-federal, lands on a national level and for 13 energy producing states, including New Mexico. Inputs for the report and tool was developed using publicly available online information such as: U.S. Energy Information Administration (EIA), U.S. Environmental Protection Agency (EPA) – Greenhouse Gas Inventory Report: 1990– 2014, U.S. Department of the Interior – Office of Natural Resources Revenue (ONRR), U.S. Extractive Industries Transparency Initiative (USEITI), Bureau of Land Management – Oil & Gas Statistics and others as applicable to each state. More information on the methodology, assumptions as well as other data sources from the report can be found in the *Greenhouse Gas and Climate Change Report, 2017* (Golder Associates 2017) and is herein incorporated by reference. Table 5 shows the results of the BLM New Mexico baseline GHG emissions as well as projected emissions for 2020 and 2030.

Table 23 and Figures 22 & 23 summarizes BLM New Mexico federal and non-federal GHG emissions from production and consumption activities. In this analysis the BLM uses, as a proxy, the total New Mexico federal and non-federal emissions to be representative of current and expected annual future New Mexico GHG emissions from production and consumption activity. Several assumptions were used in order to determine the appropriate production and consumption values and to determine the greenhouse gas emissions from the activities and are included in Section 2.4 (Golder Associates 2017). For example, state specific oil consumption is equal to state total production minus export and reserves for the state based on national averages, national averages for sector breakdown percentages (power, industrial, etc.). Additionally, for oil and natural gas liquids, consumptions were applied to state –specific data. At the state level, production does not translate to 100% consumption of the fossil fuel. New Mexico is an important supplier of electricity to the Western US. The State's power plants have historically produced more electricity than consumed in the state, and have exported significant amounts of electricity to Arizona, California, and other Western states. In 2000, for instance, New Mexico power plants produced 36% more electricity than needed for in-state use. The New Mexico electricity sector is also dominated by coal, which accounts for nearly 90% of all electricity generated in recent years. Coal-fired power plants produce as much as twice the CO_2 emissions per kilowatt-hour of electricity as natural gas-fired power plants. As a result of these factors, New Mexico power plants are the largest source of GHG emissions in the State (NMED 2016).

Table 23. Federal and Non-federal Production and Consumption GHG Emissions (Golder Associates 2017)

NM GHG Emissions (Federal) (MMT CO_2e/yr)			
Fossil Fuel	**2014 Baseline**	**2020 High**	**2030 High**
Coal	15.05	13.89	10.14
Oil	24.86	25.49	25.6
NG	46.83	49.6	57.44

NGL	6.98	6.11	6.17
Total	93.72	95.09	99.35
Total O&G Only	71.69	75.09	83.04
NM GHG Emissions (Federal +Non-Federal) (MMT CO_2e/yr)			
Fossil Fuel	**2014 Baseline**	**2020 High**	**2030 High**
Coal	46.73	43.12	31.52
Oil	53.9	55.28	55.51
NG	78.63	83.28	96.45
NGL	13.86	12.14	12.25
Total	193.12	193.82	195.7
Total O&G Only	132.53	138.56	152

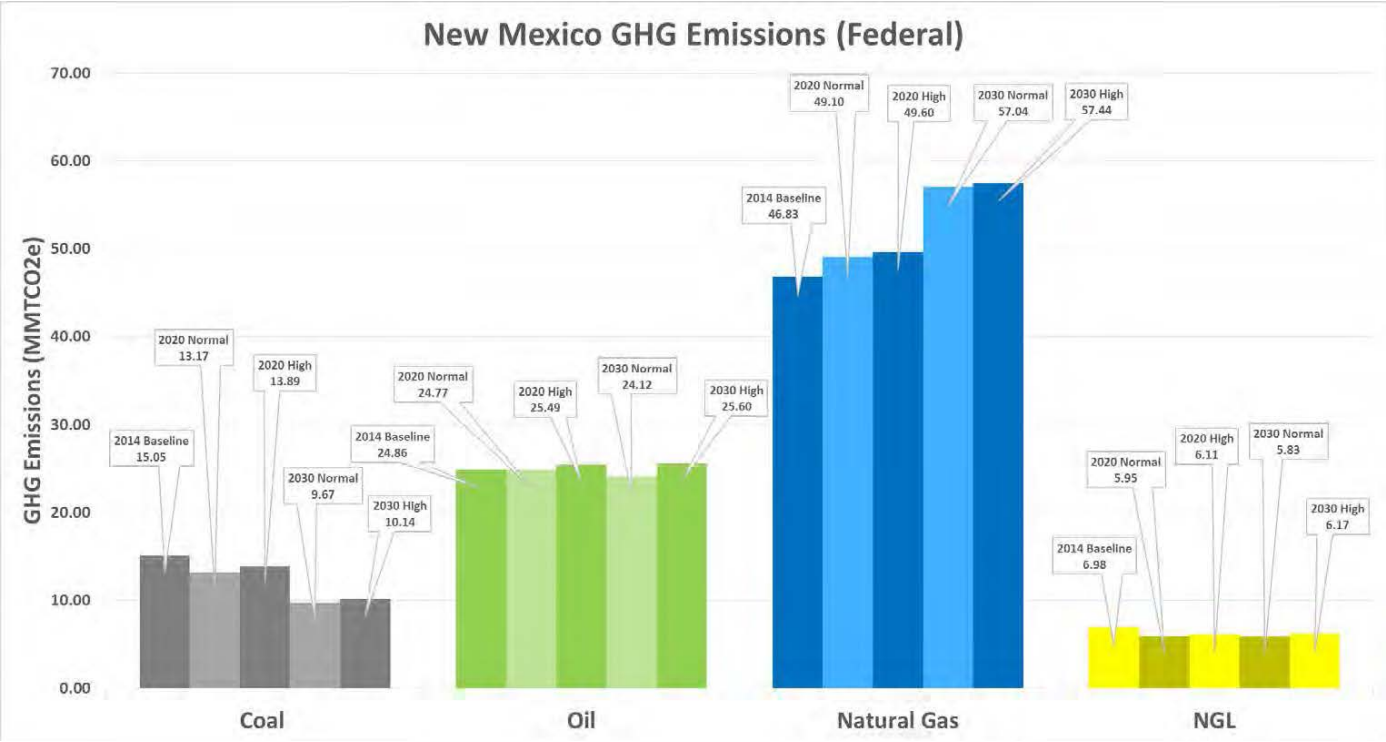


Figure 22. New Mexico GHG Emissions (Federal)

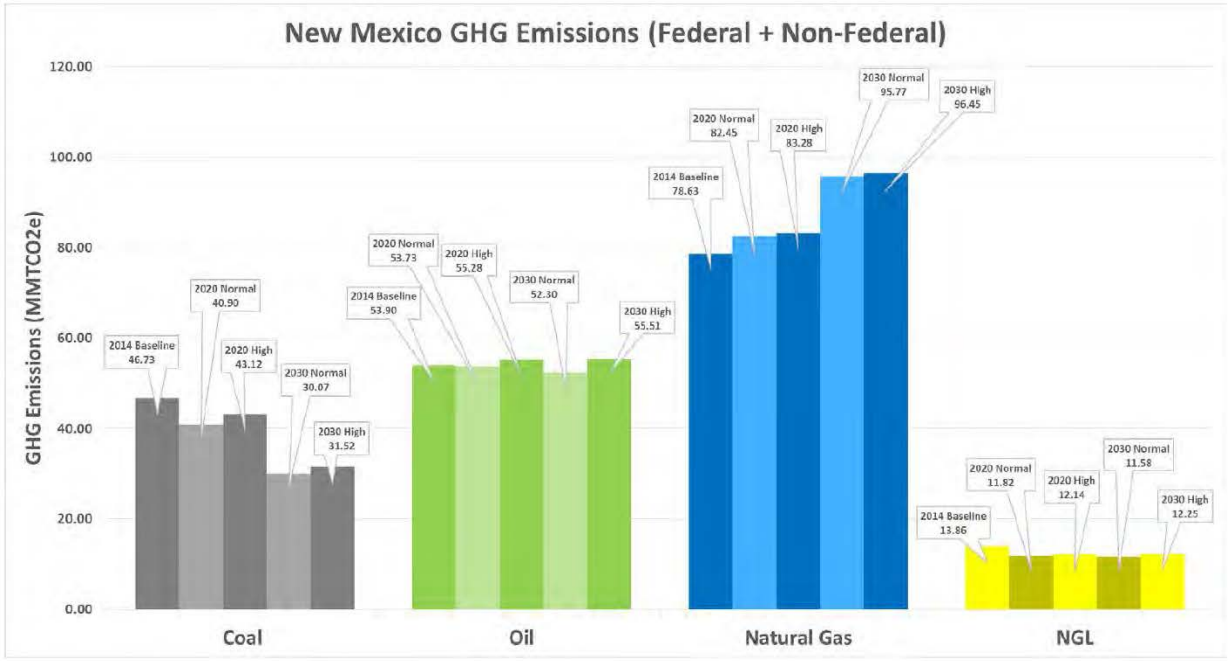


Figure 23. New Mexico GHG Emissions (Federal + Non-Federal)

BLM also approximated national GHG emissions (CO_2e) from energy production for the baseline year 2014 and future years 2020 and 2030. Growth factors are applied as compound growth, where the

exponents of each factor is raised to represent the number of years ahead of the baseline year of 2014, (see Golder Associates 2017 report). Baseline growth or decline factors were developed based on data taken from Tables A1 and B1 of the Energy Information Administration's (EIA) 2016 Annual Energy Outlook (AEO). Two scenarios were developed: normal growth and high growth. Table 24 shows the 2014 baseline CO_2e emissions from fossil fuel production as well as future projections of 2020 and 2030 with the United States across federal and non-federal sectors. All projections rely on Energy Information

Administration's (EIA) 2016 Annual Energy Outlook (AEO) growth factors. GHG emissions for future projections present only the high growth scenario, the normal growth scenario can be found in the Golder Associates report (Golder Associates 2017).

Table 24. Fossil Fuel Production and Future Year Scenarios Using AEO 2016 Outlook (Golder Associates 2017)

2014 Baseline Fossil Fuel Production in the U.S.							
	Oil Barrels (bbl)	CO_2e (MMT)	Gas (MMcf)	CO_2e (MMT)	Coal (short tons)	CO_2e (MMT)	Total CO_2e (MMT) All Fossil Fuels
U.S.	3,196,889,000	1,375	25,889,605	1,417	1,000,048,758	1900.09	4691.39
BLM	155,424,817	67	3,399,894	186	409,345,817	777.76	1030.63
Non-BLM	3,041,464,183	1,308	22,489,711	1,231	590,702,941.00	1122.34	3660.76
New Mexico	125,021,000	54	1,140,626	62	21,963,311	41.73	157.90
BLM New Mexico	57,098,252	25	753,691	41	0	0.00	65.79

2020 Future Fossil Fuel Production in the U.S. Future, High Growth Scenarios							
	Oil Barrels (bbl)	CO_2e (MMT)	Gas (MMcf)	CO_2e (MMT)	Coal (short tons)	CO_2e (MMT)	Total CO_2e (MMT) All Fossil Fuels
U.S. High Growth	3,639,277,000	1,565	30,743,208	1,682	898,459,853	1707.07	4954.17
BLM High Growth	177,967,000	77	4,062,563	222	363,786,038	691.19	990.02
Non-BLM High Growth	3,461,310,000	1,488	26,680,645	1,460	534,673,815	1015.88	3964.16

2030 Future Fossil Fuel Production in the U.S. Future, High Growth Scenarios

	Oil Barrels (bbl)	CO_2e (MMT)	Gas (MMcf)	CO_2e (MMT)	Coal (short tons)	CO_2e (MMT)	Total CO_2e (MMT) All Fossil Fuels
U.S. High Growth	3,907,285,000	1,680	37,628,912	2,059	665,345,945	1264.16	5003.27
BLM High Growth	191,073,000	82	4,972,475	272	269,398,309	511.86	866.10
Non-BLM High Growth	3,716,212,000	1,598	32,656,437	1,787	395,947,636	752.30	4137.17

11.3 REASONABLY FORESEEABLE FUTURE ACTIONS (RFFAS) AFFECTING GHG EMISSIONS

Overall, total New Mexico statewide gross GHG emissions are expected to increase (NMED 2016). The New Mexico Greenhouse Gas Inventory and Reference Case Projection 1990-2020 (CCS 2005) projects the following for year 2020 in New Mexico for emissions produced within the State (i.e., production-based emissions):

- Gross GHG emissions of 101.7 million metric tons of CO_2e— an increase of 48 percent relative to 1990 and 23 percent relative to 2000. New Mexico's emissions are well above the national average largely because of coal-based electricity generation and natural gas production activities.
- Top sources of GHG emissions: electricity production (38.1 million metric tons of CO_2e,) transportation fuel use (22.3 million metric tons of CO_2e,) and fossil fuel industry (20.7 million metric tons of CO_2e,). All have increased over 2010 estimates, but electricity and transportation fuel use increased at a higher rate than oil and gas development.
- Within the fossil fuel industry, approximately 20 million metric tons of CO_2e are projected as a result of oil and natural gas production, processing, transmission and distribution. This is 20 percent of the gross New Mexico emissions (a slight decrease over the relative contribution of oil and gas production in 2010, see past and present activity, above). About 28 percent (5.6 million metric tons of CO_2e) of the fossil fuel total is associated with oil and gas production; the remaining emissions are associated with processing, transmission, and distribution.

Although it is expected that vehicle fuel efficiency and increased use of public transportation will reduce vehicle emissions, these reductions may eventually be offset by an increased number of vehicles in use due to population growth in the region (NMED 2006).

12 MITIGATION

The reduction of emissions of air pollutants and greenhouse gases from oil and gas operations has been the subject of much study and discussion in recent years. The EPA Natural Gas Star Program established in 1993 has been a leader in developing and reporting on strategies to reduce methane emissions (EPA 2015e). These reductions can help to control not only greenhouse gases but also VOCs, which contribute

to ozone formation. Numerous opportunities for emissions reduction, including costs to implement, are documented on EPA's the Natural Gas Star website.

In 2015, EPA Natural Gas Star partner companies operated 51% of the active federal wells in the New Mexico portion of the San Juan Basin and 13% of the active federal wells in the New Mexico portion of the Permian Basin. In Kansas, Natural Gas Star partner companies operate 5% of the active federal wells; in Oklahoma, Natural Gas Star partner companies operate 11% of the active federal wells and in Texas, Natural Gas Star partner companies operate 33% of the active federal wells (BLM 2014). EPA has found Natural Gas Star partners' actions to result in measurable decreases in GHG emissions since the program's implementation. In October 2012, USEPA promulgated air quality regulations controlling VOC emissions at hydraulically fractured gas wells. These rules require air pollution mitigation measures that reduce the emissions of volatile organic compounds. These same mitigation measures have a co-benefit of reducing methane emissions.

A report by the Government Accountability Office (GAO) noted that opportunities exist for capturing fugitive emissions from venting and flaring of natural gas on wells under federal jurisdiction (U.S. Government Accountability Office 2010). A report prepared for BLM in Montana includes an entire chapter on reduction of emissions of greenhouse gases (URS Corporation (2010a). Another report recently issued by the U.S. Forest Service summarizes and builds on work originally done by BLM to identify Best Management Practices for protection of air quality during oil and gas development and production (U.S. Forest Service 2011). Rapid development could result in an increase of criteria and HAP emissions in the planning areas. Limiting development through a phased approach could help to reduce concentrations of emissions in the air basins.

Emissions associated with the RFD, including future potential development of lease parcels, would be offset by substantial decreases in emissions--including a 67% reduction in SO2, 62% reduction in NOx, 50% reduction in particulate matter, 44% reduction in CO, and 51% reduction in VOCs--resulting from power generation due to the recent shutdown of two of the units at the San Juan Generating Station. Additionally, selective catalytic reduction technology installed on the two remaining coal-fired generators at the Four Corners Power Plant would result in additional reductions in emissions from the facility, including a 36% reduction in NOx, 43% reduction in particulate matter, and 24% reduction in SO2. The San Juan Generating Station is also proposed for full closure by 2022, which would result in even further drops in future pollutant emissions for the analysis area. Additional measures taken to comply with recent revisions to the Regional Haze Rule in January 2017 would further reduce pollutant emissions. New Mexico will have to comply with these revisions as it develops its SIP for the second planning period. Cumulatively, it is expected that future levels of criteria pollutant, VOC, HAP and GHG emissions would be lower than current levels due to the aforementioned factors despite the increases in emissions associated with reasonably foreseeable oil and gas development and future potential development of the nominated lease parcels.

While it is beyond the scope of this report to detail the wide range of mitigation strategies available it must be understood that for the most part these strategies must be applied on a case by case basis at the project level.

13 OTHER TOPICS

13.1 FOUR CORNERS AIR QUALITY TASK FORCE

In 2002, the State of New Mexico Environment Department and local governments convened to sign an Early Action Compact (EAC) for ozone under a US EPA program that required commitment for state and local action to resolving ozone issues prior to a nonattainment designation. In 2005, the states of Colorado and New Mexico convened a group of stakeholders, then known as the Four Corners Air Quality Task Force (Task Force), to address air quality issues in the Four Corners region in light of continued energy development and growth in the region and consider options for mitigating air pollution. A report detailing a wide range of mitigation options was published in November 2007 (Four Corners Air Quality Task Force 2017).

In 2008, its task complete, the group became known as the Four Corners Air Quality Group (FCAQG) and continued on as a forum for discussion of existing air quality issues and potential solutions. The FCAQG is currently comprised of more than 100 members and 150 interested parties representing a wide range of perspectives on air quality in the Four Corners region. Members include private citizens, representatives from public interest groups, universities, industry, state, tribal and local governments, and federal agencies. The BLM has been an active participant from the beginning and maintains a representative on the steering committee. The last Four Corners Air Quality Group met Wednesday, October 23rd, 2019 from 9 a.m. to 4:30 p.m. at the Durango Public Library, 1900 E 3rd Ave, Durango, CO 81301. For more information visit the Four Corners Air Quality Group at the NMED website https://www.env.nm.gov/air-quality/fcaqg/.

13.2 ELECTRICAL GENERATING UNITS

There are two coal-fired electrical generation units (EGUs) in the Four Corners area: the San Juan Generating Station, located 15 miles west of Farmington, NM; and the Four Corners Power Plant, located on Navajo Nation land in Fruitland, NM. These EGUs are the primary source of several criteria air pollutants in the FFO area, including SO_2 (85%), NO_x (41%), and $PM_{2.5}$ (3%) (EPA 2014e). EGUs are responsible for 31% of New Mexico GHG emissions and 31% of U.S. GHG emissions (NMED 2016 & EPA 2017b).

In 2013, the New Mexico Environment Department, Public Service Company of New Mexico and EPA agreed to meet the requirements of the federal regional haze rule through the shutdown of two units at the San Juan Generating Station by the end of 2017. The agreement also requires the installation of selective non-catalytic reduction technology on the remaining two units. This will result in significant reductions from current emissions levels of many pollutants: a 67% reduction in SO_2, 62% reduction in

NO_x, 50% reduction in particulate matter, 44% reduction in CO, 51% reduction in VOC, 50% reduction in CO_2 and 50% reduction in mercury. The New Mexico Environmental Improvement Board approved a revision to the State Implementation Plan containing the agreement requirements in the fall of 2013.

In December 2013, three coal-fired generators were shut down at the Four Corners Power Plant as part of a plan to meet the requirements of the federal regional haze rule. The remaining two coal-fired generators will have selective catalytic reduction technology installed by 2018. These changes satisfy Best Available Retrofit Technology requirements from EPA. This will result in significant reductions from current emissions levels of many pollutants: a 36% reduction in NO_x, a 61% reduction in mercury, a 43% reduction in particulate matter, a 30% reduction in CO_2, and a 24% reduction in SO_2.

In Texas, NOx emissions from EGUs in ozone nonattainment areas (Beaumont-Port Arthur, Dallas-Fort Worth and Houston-Galveston-Brazoria) are required to limit NOx emissions from utility boilers, auxiliary steam boilers, stationary gas turbines and duct burners under 30 TAC Chapter 117, Subchapter C. The Texas proposed regional haze SIP did not require BART-eligible EGUs to install controls because the state of Texas determined impact of each plant's emissions did not significantly degrade visibility in a Class I area, or facilities had already reduced emissions or shut down units. On December 16, 2014, EPA proposed to partially disapprove the Texas regional haze SIP and also propose a Federal Implementation Plan to require SO_2 emissions reductions at fifteen Texas BART-eligible sources.

In Oklahoma, Tulsa Public Service Company of Oklahoma will retire one coal-fired unit at Oologah by April 2016 and install a dry sorbent injection system on a second coal-fired unit at the same time. The second unit will be shut down by December 31, 2026 to meet the requirements of the federal regional haze rule. In 2016, SO_2 emissions will be reduced by 78% and NO_2 emissions will be reduced by 81%. In 2011, EPA disapproved the Oklahoma SIP revision plan for controls at Oklahoma Gas and Electric's Sooner and Muskogee Units and the AEP/PSO Northeastern Units 3 and 4. EPA determined that dry scrubber control technology was needed at these units to meet federal haze rule requirements. The disapproval has been challenged by the State of Oklahoma, upheld by the courts and has now been appealed to the Supreme Court by the State of Oklahoma. Oklahoma submitted a SIP revision in 2013 that was approved by EPA in March 2014 that revises the BART determination for AEP/PSO Units 3 and 4. The revised determination included short-term compliance with emissions limits, shut down of one of the units by April 16, 2016, and shut down of the other unit by December 31, 2026.

In Kansas, emissions at four coal-fired units were significantly reduced as a result of the federal regional haze rule. At Kansas City Power and Electric's La Cygne plant, SCR was installed on both units and scrubbers were installed. This resulted in 83% reduction in NO_x emissions and 82% reduction in SO_2 emissions. At Westar's Jeffrey coal-fired units, low-NOx burner installation and switching to natural gas combustion resulted in an 82% reduction in NO_x emissions and a 34% reduction in SO_2 emissions.

13.3 IR CAMERAS

The BLM has two Infrared Cameras which are being used to detect leaks and fugitive emissions. BLM inspectors carry these cameras into the field and have been able to alert operators of equipment

requiring repair or maintenance. At this time the cameras are being used in an advisory rather than a regulatory role.

13.4 FOUR CORNERS METHANE HOTSPOT

In 2014, pioneering research using space-borne (satellite and aircraft) determinations of methane concentrations indicated anomalously large methane concentrations in the Four Corners region including the northern portion of the Farmington planning area (Kort, et al. 2014). A subsequent study (Schneising, et al. 2014) also indicated larger anomalies over other oil and gas basins in the U.S.

Methane is 34 times more potent at trapping greenhouse gas emissions than CO_2 when considering a time horizon of 100 years (IPCC 2013). While space-borne studies can determine the pollutant concentration in a column of air, these studies cannot pinpoint the specific sources of air pollution. Further study is required to determine the sources responsible for methane concentrations in the Four Corners region; however, it is known that a significant amount of methane is emitted during oil and gas well completion (Howarth, R., Santoro, R., & A.Ingraffea 2011).

Methane is also emitted from process equipment, such as pneumatic controllers and liquid unloadings, at oil and gas production sites. Ground-based, direct source monitoring of pneumatic controllers conducted by the Center for Energy and Environmental Resources show that methane emissions from controllers exhibit a wide range of emissions and a small subset of pneumatic controllers emitted more methane than most (Allen, et al. 2014a). Emissions measured in the study varied significantly by region of the U.S., the application of the controller and whether the controller was continuous or intermittently venting. The Center for Energy and Environmental Resources had similar findings of variability of methane emissions from liquid unloading (Allen, et al., 2014b).

In 2016, results from an April 2015 study was released in which researchers conducted further ground-based and space-borne studies utilizing emerging pollutant measurement technology. The NASA Jet Propulsion Laboratory conducted these studies using two JPL airborne spectrometers to identify and measure more than 250 individual sources of methane. The sources emitted the gas at rates ranging from a few pounds to 11,000 pounds (5,000 kilograms) per hour (NASA 2016). Overall, observed sources included gas processing facilities, storage tanks, pipeline leaks, and well pads, as well as a coal mine venting shaft. Using equipment enhancements and inferred fluxes, the methane plumes showed that the top 10% of emitters contributed 49 to 66% to the inferred total point source flux of 0.23 Tg/y to 0.39 Tg/y. To understand more about the terminology and study, results are published at the Proceedings of the National Academy of Sciences in a paper titled *"Airborne methane remote measurements reveal heavy-tail flux distribution in Four Corners region."* (Frankenburg et al 2016).

Information on methane may also be found in a new interactive mapping tool launched by New Mexico Environment Department in 2019. This tool shows methane hotspot information as well as information on methane permits. The mapping tool shows elevated methane levels along the northern border of San Juan County and western border of Rio Arriba County, New Mexico and along the southern borders of Montezuma County and La Plata County, Colorado. It also provides locations of NMED-permitted oil and

gas wells and tank batteries for permits greater than 10 tons of methane emissions per year. These sources are concentrated along State Route 550 in San Juan, Rio Arriba, and Sandoval Counties, northeast of CCNHP (NMED 2019).

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15 APPENDICES

15.8 APPENDIX H CALCULATORS