Appendix J

Comprehensive Air Resource Protection Protocol

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COLORADO BUREAU OF LAND MANAGEMENT

COMPREHENSIVE AIR RESOURCE PROTECTION PROTOCOL (CARPP)

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CARPP Change History

Section	Revision	Date
III.D.1	Amended paragraph to reflect final approved LN language.	2/11/2014
III.B	Added summary language for newly developed guidance appendix	5/5/2015
App. A	Added appendix A (Air Resources Oil and Gas NEPA Analysis Process)	5/5/2015
I.A	Clarified scope language (living doc) and added website reference	7/6/2015

COMPREHENSIVE AIR RESOURCES PROTECTION PROTOCOL (CARPP)

SECTION I – PURPOSE, SCOPE, AND RESPONSIBILITIES

This Comprehensive Air Resources Protection Protocol (CARPP) describes the process and strategies the BLM will use when authorizing activities that have the potential to adversely impact air quality within the state of Colorado. This protocol also outlines specific measures that may be taken to address BLM-approved activities with the potential to cause significant adverse impacts to air resources (via the generation of significant quantities of air emissions) within any planning area (as determined on a case by case basis). Further, the purposes of this protocol are to address air quality issues identified by the Bureau of Land Management (BLM), or public scoping, in its analysis of potential impacts on air resources for BLM Colorado Resource Management Plans and Environmental Impact Statements (RMP/EIS); and clarify the mechanisms and procedures that BLM will use to achieve the air resources goals, objectives, and management actions set forth in BLM Colorado RMPs.

I.A CARPP Scope

The CARPP is not a decision document, but rather a strategy to address air quality concerns throughout BLM-managed lands and resources in Colorado. Because the CARPP is not a field office specific management tool, it may be modified as necessary to comport or comply with changing laws, regulations, BLM policy, or to address new information and changing circumstances without maintaining or amending any specific Field Office RMP (see reference version date on the cover page).

However, changes to the goals, objectives, or management actions set forth in any Colorado Field Office RMP/EIS as a result of the changes in the CARPP (or more specifically, any subsequent analysis based on such changes) would require an amendment of the specific RMP being affected.

The CARPP is designed to be a living document; ergo readers should always refer to the BLM's Air Resources Webpage at to ensure they are viewing the most up to date version (http://www.blm.gov/co/st/en/BLM_Information/nepa/air_quality.html).

I.B BLM Responsibilities under FLMPA and MLA

The BLM has the authority and responsibility under the Federal Land Policy and Management Act (FLPMA) to manage public lands in a manner that will protect the quality of air and atmospheric values [FLPMA Sec. 102(a)(8)]. The FLPMA also provides that the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands and includes provisions for implementing the Mining and Minerals Policy Act of 1970 [FLPMA Sec. 102(a)(12)]. The BLM has the responsibility under the Mineral Leasing Act (MLA) to

implement the decisions of any RMP/EIS in a manner that recognizes valid and existing lease rights[1].

Further, the FLPMA provides that "In the development and revision of land use plans, the Secretary shall provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans;" [FLPMA Sec. 202(c)(8)][2].

SECTION II – INTERAGENCY AIR RESOURCES COLLABORATION

The Bureau of Land Management is firmly committed to working with federal, state, tribal, and local air resource management partners to address complex and often cross-jurisdictional air quality issues. As a federal agency, we have a role to provide leadership in addressing known air quality issues within our authority and domain, while upholding our responsibility to manage the public lands for multiple-use under the FLPMA. We also recognize that the State of Colorado, specifically the Colorado Department of Public Health and Environment (CDPHE), has the primary responsibility and authority delegated by the EPA to regulate and maintain air quality standards within Colorado in accordance with the Clean Air Act. Interagency collaboration is the key to management of air quality, as no single agency has all the necessary tools to solve these complex issues alone. We must act together.

To that end the BLM will work collaboratively with other local, state, federal, and tribal agencies involved in the management of air resources to develop a comprehensive strategy to protect air resources from potentially significant adverse impacts resulting from BLM approved activities in Colorado.

II.A National Air Quality MOU

When making oil and gas implementation decisions, the BLM will consider or apply, as appropriate, the provisions of the *Memorandum of Understanding Among the US Department of Agriculture, US Department of the Interior, and US Environmental Protection Agency, Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions Through the NEPA Process*, signed June 23, 2011.

SECTION III – ACTIONS TO ANALYZE & PROTECT AIR QUALITY

[1] H-1601-1 - LAND USE PLANNING HANDBOOK: A plan-level decision to open the lands to leasing represents BLM's determination, based on the information available at the time, that it is appropriate to allow development of the parcel consistent with the terms of the lease, laws, regulations, and orders, and subject to reasonable conditions of approval. When applying leasing restrictions, the least restrictive constraint to meet the resource protection objective should be used.

[2] Note: Where sources of air pollution emissions are regulated by an entity/agency (Federal, State, Tribal, Local), the BLM shall not craft alternatives with features or conditions that interfere with a proponents ability to comply with such laws or standards. IBLA has held that the meaning of "providing for compliance" does not require that the BLM has any obligation to ensure compliance where another agency holds such responsibility [*Wyoming Outdoor Council, et al*176 IBLA 15, 27 (2008); Powder River Basin Resource Council, 183 IBLA 83, 94-95 (2012)]. However, the BLM should appropriately analyze such sources (as well as non-regulated sources) within the applicable NEPA context to disclose potential impacts, determine significance, and provide for mitigation as necessary and within our authority for any specific finding.

The following sections describe actions the BLM will take to ensure an adequate analysis and subsequent protection for air quality resources within Colorado. Appropriate air resources protection requires the BLM to manage its authorized activities and actions at broad spatial and temporal scales that are dynamic and thus subject to change. The BLM will accomplish this through an adaptive management approach, which includes establishing baseline conditions, monitoring, reevaluation, and adjustment as necessary. Adaptive management therefore contemplates regular review and adjustment of management approaches during the authorization of emissions generating activities commensurate with changing circumstances.

III.A MONITORING

Ambient air monitoring provides valuable data for determining current and background concentrations of air pollutants, describing long term trends in air pollutant concentrations, and evaluating the effectiveness of air control strategies. The BLM's comprehensive air resource protection protocol includes the ambient air monitoring measures described in this section.

III.A.1 – Air Monitoring Network

The BLM will participate in a cooperative effort with industry, CDPHE, Forest Service, National Park Service, EPA, local counties, and other entities as appropriate, to establish, operate, and maintain a comprehensive air monitoring network within the planning areas where a need for monitoring has been identified (contingent upon available funding). The BLM will cooperate in the sharing of air monitoring data collected by the air monitoring network with other agencies and the public.

III.A.2 – Pre-Construction Air Monitoring

The BLM may request proponents of projects with the potential to generate significant air emissions, to submit pre-construction air monitoring data from a site within or adjacent to the proposed development area. The purpose of this air monitoring is to determine baseline air quality conditions prior to development at the site. The need for monitoring will be determined by the BLM based on the availability or absence of existing representative air monitoring data and the factors listed in Section III.D of this protocol. If the BLM determines that pre-construction monitoring is necessary, the project proponent must provide a minimum of one year of representative ambient air monitoring data for the pollutants of concern. The project proponent will be responsible for siting, installing, operating, and maintaining any new air monitoring equipment needed to fulfill this requirement in the absence of existing representative air monitoring data.

III.A.3 – Life of Project Air Monitoring

The BLM may require proponents or operators of Federal mineral development projects, or proponents of other potentially significant emission generating projects, to conduct air monitoring for the life of the project based on the availability or absence of representative air monitoring data and the factors listed in Section III.D of this protocol. The purpose of this air monitoring is to

measure impacts potentially attributable to the project over time and to determine the effectiveness of emissions control measures required for the project. The project proponent will be responsible for siting, installing, operating, and maintaining any new air monitoring equipment needed to fulfill this requirement in the absence of existing representative air monitoring data.

III.A.4 – Monitoring Data Transparency

Project-specific monitoring data may be used by the BLM in subsequent NEPA analysis required for project approvals. Thus public disclosure of such data is assured via the NEPA process, if used. Additionally, the BLM will ensure that ambient air monitoring data collected as a COA for any BLM authorized activity will be made publicly available within the body or our annual report required under Section V of this protocol.

III.B EMISSIONS INVENTORIES

The BLM will request the proponent of an oil and gas development activity (as proposed in a permit application, plan of development, or Master Development Plan) to submit a comprehensive inventory of anticipated direct and indirect emissions associated with the proposed project. The emissions inventory will include estimated emissions of regulated air pollutants from all sources related to the proposed activity, including fugitive emissions and greenhouse gas emissions, for each year or distinct project phase over the life of the project. The BLM will review the emissions inventory to determine its completeness and accuracy. In most cases the BLM will accept inventory data reported to other agencies for the purposes of meeting this requirement. For example BLM would accept copies of actual emissions data for criteria pollutants, volatile organic compounds, hazardous air pollutants, and greenhouse gases that are submitted to CDPHE as required for applicable air permitting or APEN requirements, or submittals to COGCC in the form of drilling and production data reports, and data to EPA under the Greenhouse Gas Reporting Rule (40 CFR Part 98 Subpart W) for the authorized action.

The BLM COSO developed guidance for the purposes of improving the adequacy, consistency, and efficiency of the Bureau of Land Management (BLM) Colorado air resources analysis. The guidance provides the CO BLM field offices with: 1) a standardized process to follow for completing air resource analysis for project specific O&G development, 2) field office specific air resource NEPA sections of the affected environment and cumulative impacts (to be updated as required, but not less than annually by COSO Air Resource Specialists), and 3) tools to enable field office staff and project proponents to adequately develop the information necessary to analyze and disclose potential air resource impacts within NEPA documents.

In brief, the guidance requires a project level emissions inventory for ALL oil and gas projects that utilizes the COSO air resource specialists (ARS) developed Emissions Inventory Tool. Once the inventory has been completed, BLM staff will follow the analysis framework (found in Appendix A) to compare the emissions inventories and project parameters against in order to determine the level of NEPA analysis required.

III.C MODELING

Air dispersion and photochemical grid models are useful tools for predicting project-specific impacts on air quality, predicting the potential effectiveness of control measures and strategies, and forecasting trends in regional concentrations of air pollutants. The BLM will use regional air modeling and project-specific modeling, in conjunction with other air analysis tools, to develop air resource protection strategies consistent with our responsibilities under FLPMA. Further, the BLM will provide appropriate disclosure for any modeling of direct, indirect, and cumulative impacts of proposed actions during the required NEPA analysis.

III.C.1 – Project-specific Modeling

The BLM may require project-specific air quality modeling, consistent with the Air Resources MOU to analyze potential impacts from a proposed Federal mineral development project or other proposed activity that has the potential to emit significant quantities of a regulated air pollutant and the effectiveness of any air emission control measures. Project proponents may submit results from other modeling analyses that include activities similar to the proposed project for BLM's review and approval, and if approved, those modeling results may be used in lieu of new project-specific modeling. The decision as to whether to require air quality modeling will be based on factors listed in Section III.D of this protocol. The BLM will not require an air modeling analysis when it can be demonstrated that the project will not cause a substantial increase in emissions of the pollutants of concern.

III.C.2 – Modeling Protocol

The BLM will determine the parameters required for a project-specific modeling analysis through the development of a modeling protocol for each analysis. When conducting a regional model or EIS level project specific oil and gas air modeling analysis, the BLM will adhere to the *Memorandum of Understanding Among the US Department of Agriculture, US Department of the Interior, and US Environmental Protection Agency, Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions Through the NEPA Process*, signed June 23, 2011.

III.C.3 – Regional Air Modeling

The BLM will support and participate in regional modeling efforts through multi-state and/or multi-agency organizations such as Western Governors' Association – Western Regional Air Partnership (WRAP) and the Federal Leadership Forum (FLF). In addition, BLM will, contingent upon available funding, conduct and facilitate regional air modeling as needed. Currently, the BLM is facilitating the Colorado Air Resources Management Modeling Study (CARMMS). CARMMS is a BLM funded regional air quality modeling study of expected impacts on air quality from projected increases in oil and gas development across Colorado and certain upwind adjacent states.

- The CARMMS modeling protocol/study will be developed by the BLM with involvement from appropriate local, state, federal, and tribal agencies

involved in the management of air resources and the authorization and regulation of oil and gas development.

- The CARMMS results will include the predicted impacts from all projected federal and non-federal oil and gas development within the region.
- The CARMMS results and analysis will be made available to the public.

III.C.4 – Evaluation of Modeling Results

The BLM will cooperate in an interagency process to develop a comprehensive strategy to manage air quality impacts from future oil and gas development within the region. As part of that strategy, the local, state, federal, and Tribal agencies involved in the regulation of air quality and the authorization of oil and gas development would evaluate modeling results from CARMMS or other future modeling studies and identify potential air quality concerns and necessary reductions in air emissions. If the modeling predicts significant impacts, these agencies would use their respective authorities to implement appropriate enhanced emission control strategies, operating limitations, equipment standards, and/or pacing of development.

III.C.5 – Future Modeling Studies

Future iterations of the CARMMS, or a similar regional modeling study of expected impacts from oil and gas development, may be conducted through a collaborative interagency management mechanism and interagency / industry funding mechanism.

III.D PERMITTING

As part of the NEPA process and prior to the authorization of any Federal mineral development activity the BLM will conduct an air analysis to determine the potential impacts on air quality based on the estimated emissions from the activity being authorized. The BLM may conduct such an analysis for other authorized activities with the potential to generate significant emissions of a regulated pollutant. The BLM will consider the following factors to identify pollutants of concern and make decisions regarding the appropriate level of air analysis, monitoring, and reporting requirements for the proposed activity.

- magnitude of potential air emissions from the proposed activity
- duration of proposed activity and distinct phase considerations
- proximity to a federally mandated Class I area, sensitive Class II area (as identified on a case-by-case basis by CDPHE or a federal land management or tribal agency), population center, or other sensitive receptor
- location within or adjacent to a non-attainment or maintenance area
- meteorological and geographic conditions

- existing air quality conditions including measured exceedances of NAAQS or CAAQS and measured adverse impacts on air quality related values (AQRVs) at Class I and sensitive Class II areas
- intensity of existing and projected development in the area
- issues identified during project scoping

III.D.1 – Statewide Lease Notice

The following Lease Notice language will be incorporated into all new leases.

Due to potential air quality concerns, supplementary air quality analysis may be required for any proposed development of this lease. This may include preparing a comprehensive emissions inventory, performing air quality modeling, and initiating interagency consultation with affected land managers and air quality regulators to determine potential mitigation options for any predicted significant impacts from the proposed development. Potential mitigation may include limiting the time, place, and pace of any proposed development, as well as providing for the best air quality control technology and/or management practices necessary to achieve area-wide air resource protection objectives. Mitigation measures would be analyzed through the appropriate level of NEPA analysis to determine effectiveness, and will be required or implemented as a permit condition of approval (COA). At a minimum, all projects and permitted uses implemented under this lease will comply with all applicable National Ambient Air Quality Standards and ensure Air Quality Related Values are protected in nearby Class I or Sensitive Class II areas that are afforded additional air quality protection under the Clean Air Act (CAA).

III.E MITIGATION

Many activities that the BLM authorizes, permits, or allows generate air pollutant emissions that have the potential to adversely impact air quality. The primary mechanism to reduce air quality impacts is to reduce emissions via project design features and mitigation. Appropriate emission reduction measures are best identified and required at the project authorization stage, when the temporal and spatial characteristics and technological specifications of the proposed action have been defined. The project-specific information available at that stage allows for the development of an emissions inventory and impact analysis that can be used to identify effective mitigation options for predicted adverse impacts. Section IV, Emissions Reduction Strategies and Best Management Practices, provides some emission reduction technologies and strategies as an example. The list in Table VI-1 is not intended to be all inclusive or preclude the use of other effective air pollution control technologies that may be proposed.

The BLM will ensure implementation of reasonable mitigation, control measures, and design features through appropriate mechanisms, including lease stipulations identified in RMPs, notices to lessees, and conditions of approval (permit terms and conditions) as provided for by law and consistent with lease rights and obligations. In the absence of, or in addition to effective control technologies, the BLM may manage the pace, place,

density, and intensity of leasing and development to meet air quality goals and objectives as defined under any applicable RMP.

III.E.1 – Emissions Reduction Planning / Minimizing Air Emissions

The BLM will request proponents of oil and gas development projects that have the potential to significantly adversely impact air quality or predicted to exceed an air quality standard to provide an emissions reduction plan where air quality has been identified as a resource of concern in applicable NEPA analysis. Plans shall include a detailed description of operator committed measures to reduce project related air pollutant emissions including greenhouse gases and fugitive dust. All projects are required to comply with all applicable state and federal regulations.

III.E.2 – Project-specific Mitigation

If the project-specific air quality analysis predicts future impacts on NAAQS or CAAQS (i.e. exceedances) or adverse impacts to AQRVs in Class I or sensitive Class II areas, the BLM will analyze air quality mitigation measures for emission sources. Further, if the regional air quality modeling study conducted under Section III.C.3 predicts significant cumulative impacts on air resources from expected oil and gas development in the region, the BLM may require the proponent of an oil and gas development project to apply reasonable mitigation including but not limited to best management practices (see Section VI), emissions offsets, and other control technologies or strategies identified in the project-specific air quality analyses.

Where identified and analyzed mitigation measures cannot be reasonably implemented for a particular proposed action due to the overall project design, or substantial technical or economic barriers, the BLM will work with project proponents during the NEPA process to develop operator-committed measures or acceptable emissions offsets that would be included as conditions of approval (COA). Any operator committed measures would be required to provide an air quality benefit sufficient in type, scale, location, and timing to avoid the anticipated adverse impact or at a minimum, to reduce it to an acceptable level for the specific area and pollutant(s) analyzed.

III.F Protocol Implementation

The BLM will ensure that air resource protection strategies and mitigation measures are implemented by including project-specific COAs (operator-committed and/or required mitigation) for each authorized action. Any COAs applied to projects as a result of this process shall be clearly consistent with the applicable RMP management decisions and/or subsequent analysis of new or previously unavailable information upon which the BLM can reasonably rely.

SECTION IV – ADAPTIVE MANAGEMENT PROCESSES FOR AIR RESOURCES

Adaptive management incorporates the principles of monitoring current conditions, predicting future impacts, and adapting management strategies to account for changing conditions. An adaptive management strategy for air quality resources allows the BLM to comply with NEPA and complete an appropriate analysis to ensure that activities approved by the BLM minimize adverse impacts to air quality; while allowing for development of important domestic energy resources.

The BLM will implement an adaptive management strategy to account for changing air quality conditions and to minimize adverse impacts to air resources from BLM-authorized activities. The strategy includes evaluating air quality on an on-going basis, and if necessary, implementing appropriate mitigation measures to meet the identified objectives and targets for any applicable Colorado RMP. The adaptive management strategy is intended to be transparent and as such the process includes an annual reporting component that will be made available to the public, as well as case by case incorporation of specific plan elements within individual project approvals. Components of this adaptive management strategy include the following:

IV.A Establish Baseline Air Quality Conditions

Existing air quality conditions will be established and continuously updated on an annual basis. To establish a periodic baseline, data must be compiled and analyzed such that air quality value trends (NAAQS & AQRVs for Class I and sensitive Class II areas) can be established or evaluated for the purpose of predicting future impacts from BLM-authorized activities. Sources of data for this analysis may include raw air quality monitoring station data, air quality monitoring reports prepared by others (CDPHE, EPA, NPS or USFS), and/or appropriate regional modeling results.

In addition to monitored or predicted background data, regional emissions inventories will be continuously or periodically updated to reflect the annual mass of pollutants added to the atmosphere. The data will provide an understanding between mass emissions and monitored/modeled air quality conditions and provide a reasonable basis from which to evaluate impacts from future projects or actions.

The last component of the baseline analysis includes providing a brief synopsis of the current meteorological conditions that exist for any planning area such that exceptional events and historical deviations in atmospheric values can be documented to provide additional context for the observed/reported air quality values.

IV.B Emissions Tracking

To provide for the periodic baseline the BLM will use the project-specific information used in its NEPA analyses as a mechanism to track emissions of criteria pollutants, volatile organic compounds, hazardous air pollutants, and greenhouse gases from BLM authorized oil and gas activities within each field office planning area. (NOTE: the BLM may incorporate emissions inventories for other authorized activities with significant emissions to provide for an appropriate cumulative inventory, where such sources are not already included as a Colorado Air Pollution Emissions Notice, or National Emissions Inventory component). The BLM will use emissions data from APDs to inform iterative elements of our adaptive management strategy, including modeling inputs and any

subsequent prescriptive or comparative project tiering from any applicable modeling results.

IV.C Prescriptive Model Validation

Prescriptive model validation includes comparing the annual NEPA emissions data from BLM authorized oil and gas activities within the planning areas to emission levels analyzed in the CARMMS modeling study (or the most recent BLM or interagency air impacts analysis conducted in accordance with the provisions of the modeling Section III above). Emissions data will include specific oil and gas indicators, such as the number of wells drilled, number of producing wells, production data, compressor stations installed, centralized liquids gathering stations, and gas treatment facilities constructed. The actual emissions levels and new baseline air quality observations will be correlated against the modeled parameters to determine the reasonableness of the model for predicting impacts and its continued appropriateness as a reference for any subsequent project analysis.

If during the course of our annual analysis it is determined that the model has not demonstrated a reasonable correlation of predicted impacts (for modeled emissions inventory levels) compared against the actual emissions recorded for a planning area, the BLM will investigate the potential sources of the discrepancy to determine a potential cause, such as meteorological factors (ex: winter time ozone, which cannot be modeled at this time), or fee mineral development (i.e. non-BLM authorized actions). If a probable cause for the discrepancy cannot be established, then the BLM will initiate interagency coordination with our regulatory partners to determine if a new modeling analysis is potentially warranted.

IV.D Responding to Monitored Exceedances of the NAAQS

If during the course of a year a Federal Reference or Equivalent air monitor within any planning area records a validated exceedance of any NAAQS (excluding any non-attainment areas) the BLM will review the available data to determine if any BLM authorized activity caused or significantly contributed to the exceedance event. The review will encompass the following steps.

IV.D.1– QA/QC

The BLM will ensure the validity of the monitored data by: (a) reviewing Quality Assurance/Quality Control (QA/QC) metadata to ensure against false high readings, and (b) reviewing meteorological data to determine if an exceptional atmospheric event such as stratospheric ozone intrusion occurred. The BLM may contact CDPHE for technical consultation and concurrence regarding possible exceptional events.

IV.D.2 – Screening Analysis

If the monitoring data are validated, the BLM will conduct a screening analysis to determine the likely cause, source, or origin of the exceedance and whether any BLM authorized source(s) within or adjacent to the planning area caused or contributed to the monitored exceedance. If the screening analysis indicates

BLM-authorized sources did NOT cause or significantly contribute to the exceedance, then no further action will be taken by the BLM. The data, analysis, and conclusions will be included in the annual public report described under I.C above.

IV.D.3 – Enforcement

Should the results of the screening analysis indicate that a BLM authorized source(s) caused or significantly contributed to the monitored exceedance, the BLM will review the COA from the authorization for the source(s) to determine if all the COA were implemented as required. Where it is determined that operators did not comply with the conditions of approval for their authorized activities, and did not submit an appropriate sundry notice for approved deviations from such conditions, BLM may issue a notice of incident of noncompliance or take other appropriate enforcement action.

IV.D.4 – Contingency Planning

If, after review the BLM determines that an authorized source(s) caused or significantly contributed to the monitored exceedance, the BLM will initiate consultation with CDPHE, EPA, and any other applicable local, state, federal, and tribal agencies with responsibility for managing air resources to address appropriate responses to the monitored exceedances. Responses to monitored exceedances may include employing more stringent mitigation measures within the agencies' respective authority to reduce projected future emissions and performing additional modeling and analysis to determine the overall effectiveness of such mitigation measures.

Additionally, the BLM may implement reasonable temporary measures that have been included in a project specific authorization as conditions of approval, which could limit drilling operations, completions or well stimulations, blowdowns, or other non-essential operations during specified time periods (i.e. a timing limitation). Other actions the Bureau may take would include limiting the number of annual APD approvals issued for the affected area until such time that updated regional modeling can be conducted to provide an appropriate assessment of the expected impacts from a reasonable level of development.

IV.E Evaluating Projected Future Development/Emissions

Periodically, but not less than every three years, the BLM will evaluate the available or reasonably foreseeable oil and gas development projections for each planning area for the following three to five year period, and compare these projected levels to the level of predicted future development analyzed in the CARMMS modeling study (or the most recent BLM or interagency air impacts analysis conducted under the provisions of the modeling section(s) III.C.3 or III.C.5 above). The BLM will use the projected development/emissions data to determine whether the modeling analysis remains appropriate as a reference for any subsequent project analyses.

Section V – Annual Summary Report

Annually, the BLM will prepare a comprehensive summary report (from actual project data and analysis). This report will be made available to the public. The BLM will use this annual review to evaluate whether current air resources protection strategies are meeting the goals and objectives established within the BLM Colorado RMPs. If the analysis shows that the strategies are not achieving our defined air resource protection goals, the BLM will collaborate with CDPHE and the EPA to develop or modify air resource protection strategies as necessary to effectively protect air resources within any deficient planning area. Should this result in changes to RMP goals and objectives, additional planning level analyses will be required.

Section VI – Oil and Gas Development Emissions Reduction Strategies & BMPs

Table VI-1 displays some emission reduction measures, their potential environmental benefits and liabilities, and feasibility. The table is not meant to be exhaustive in terms of available or acceptable emissions reduction/control technologies or techniques, but provides a baseline or starting point from which to construct design features and mitigation options for project specific or regional analyses.

Table VI-1 Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development

Emission Reduction Measure	Potential Environmental Benefits	Potential Environmental Liabilities	Feasibility
Control Strategies for Drilling and Compression			
Multi-well pad directional or horizontal drilling.	When compared to single pad vertical drilling, reduces construction related emissions, decreases surface disturbance, reduces trip frequencies, and reduces habitat fragmentation.	Could result in higher air impacts in one area with longer sustained drilling times.	Depends on geological strata, topography, and other physical constraints.
Improved engine technology (Tier 2 or 4) for diesel drill rig engines.	Reduced NOx, PM, CO, and VOC emissions.		Dependent on availability of technology from engine manufacturers and, potentially differentials in cost for small operators..

Table VI-1 Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development

Emission Reduction Measure	Potential Environmental Benefits	Potential Environmental Liabilities	Feasibility
Selective Catalytic Reduction (SCR) for drill rig engines and/or compressors.	NO_x emissions reduction, potential decreased formation of visibility impairing compounds and ozone. NOx control efficiency of 95% achieved on drill rig engines. NOx emission rate of 0.1 g/hp-hr achieved for compressors.	Potential NH3 emissions and formation of visibility impairing ammonium nitrate. Regeneration/disposal of catalyst can produce hazardous waste.	Not applicable to 2-stroke engines.
Non-selective catalytic reduction (NSCR) for drill rig engines and/or compressors.	NOx emissions reduction, potential decreased formation of visibility impairing compounds, and ozone. NOx control efficiency of 80-90% achieved for drill rig engines. NOx emission rate of 0.7 g/hp-hr achieved for compressor engines greater than 100 hp.	Regeneration/disposal of catalysts can produce hazardous waste.	Not applicable to lean burn or 2-stroke engines.
Natural Gas fired drill rig engines.	NOx emissions reduction, potential decreased formation of visibility impairing compounds, and ozone.	May require construction of infrastructure (pipelines and/or gas treatment equipment). May require onsite gas storage. May require additional engines to supplement needed torque.	Requires onsite processing of field gas.
Electrification of drill rig engines and/or compressors	Decreased emissions at the source. Transfers emissions to more efficiently controlled source (EGU).	Displaces emissions to EGU. Temporary increase in emissions with construction of power lines.	Depends on availability of power and transmission lines.
Improved engine technology (Tier 2, 3 or 4) for all mobile and non-road diesel engines.	Reduced NOx, PM, CO, and VOC emissions.		Dependent on availability of technology from engine manufacturers.

Table VI-1 Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development

Emission Reduction Measure	Potential Environmental Benefits	Potential Environmental Liabilities	Feasibility
Reduced emission (a.k.a. "green") completions.	Reduction in VOC and CH4 emissions. Reduces or eliminate flaring and venting and associated emissions. Reduces or eliminates open pits and associated evaporative emissions. Increased recovery of gas to pipeline rather than atmosphere.	Temporary increase in truck traffic and associated emissions due to delivery of onsite equipment or due to construction of infrastructure.	Need adequate pressure and flow. Need onsite infrastructure (tanks/dehydrator). Availability of sales line. Green completion required where feasible per COGCC Rule 805(b)(3) and NSPS 40 CFR 63 OOOO.
Flaring of completion emissions	Reduces methane, VOC, and some HAP emissions. Converts CH4 to CO2.		
Minimize/eliminate venting and/or use closed loop process where possible during "blow downs".	Reduces methane, VOC, and some HAP emissions		
Eliminate evaporation pits for drilling fluids.	Reduces VOC and GHG emissions. Reduces potential for soil and water contamination. Reduces odors.	May increase truck traffic and associated emissions. May increase pad size.	Requires tank and/or pipeline infrastructure.
Electrification of wellhead compression/ pumping.	Reduces local emissions of fossil fuel combustion and transfers to more easily controlled source.	Displaces emissions to EGU.	Depends on availability of power and transmission lines.
Wind (or other renewable) generated power for compressors.	Low or no emissions.	May require construction of infrastructure. Visual impacts. Potential wildlife impacts.	Depends on availability of power and transmission lines.
Compressor seals – replace wet with dry or use mechanical seal.	Reduce gas venting (VOC and GHG emissions).		May be costly or not mechanically feasible.
Compressor rod packing system – use monitoring and replacement system.	Reduce gas leaks (VOC and GHG emissions).		Requires establishing a monitoring system and doing replacements.

Table VI-1 Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development

Emission Reduction Measure	Potential Environmental Benefits	Potential Environmental Liabilities	Feasibility
Control Strategies Utilizing Centralized Systems			
Centralization (or consolidation) of gas processing facilities (e.g., separation, dehydration, sweetening).	Reduces vehicle miles traveled (truck traffic) and associated emissions. Reduced VOC and GHG emissions from individual dehydration/ separator units.	Temporary increase in construction associated emissions. Higher potential for pipe leaks/groundwater impacts.	Requires pipeline infrastructure, infeasible for highly dispersed or exploratory wells.
Liquids Gathering systems (for condensate and produced water).	Reduces vehicle miles traveled and associated emissions. Reduced VOC and GHG emissions from tanks, truck loading/unloading, and multiple production facilities.	Temporary increase in construction associated emissions. Higher potential for pipe leaks/groundwater impacts.	Requires pipeline infrastructure . May be infeasible for highly dispersed or exploratory wells, difficult terrain, or patchy surface ownership.
Water and/or fracturing liquids delivery system.	Reduced long term truck traffic and associated emissions.	Temporary increase in construction associated emissions. Higher potential for pipe leaks/groundwater impacts.	Requires pipeline infrastructure. May be infeasible for highly dispersed or exploratory wells, difficult terrain, or patchy surface ownership.
Control Strategies for Tanks, Separators, and Dehydrators			
Eliminate use of open top tanks.	Reduced VOC and GHG emissions.		
Capture and control of flashing emissions from all storage tanks and separation vessels with vapor recovery and/or thermal combustion units.	Reduces VOC and GHG emissions.	Pressure buildup on older tanks can lead to uncontrolled rupture.	
Capture and control of produced water, crude oil, and condensate tank emissions.	Reduces VOC and GHG emissions.		95% VOC control required by COGCC in some areas and by CDPHE statewide with applicability thresholds

Table VI-1 Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development

Emission Reduction Measure	Potential Environmental Benefits	Potential Environmental Liabilities	Feasibility
Capture and control of dehydration equipment emissions with condensers, vapor recovery, and/or thermal combustion.	Reduces VOC, HAP, and GHG emissions.		90% VOC control required by COGCC in some areas and by CDPHE statewide with applicability thresholds
Use zero emissions dehydrators or use desiccants dehydrators.	Reduces VOC, HAP, and GHG emissions.	Requires desiccants (salt tablets and forms a brine solution that must be disposed of.	Can be as effective as Triethylene glycol (TEG) dehydration.
Control Strategies for Misc. Fugitive VOC Emissions			
Install plunger lift systems to reduce well blow downs.	Reduces VOC and GHG emissions.		Can be more efficient at fluids removal than other methods; must have adequate pressure.
Install and maintain low VOC emitting seals, valves, hatches on production equipment.	Reduces VOC and GHG emissions.		
Initiate equipment leak detection and repair program (e.g., including use of FLIR infrared cameras, grab samples, organic vapor detection devices, and/or visual inspection).	Reduction in VOC and GHG emissions.		
Install or convert gas operated pneumatic devices to electric, solar, or instrument (or compressed) air driven devices/controllers.	Reduces VOC and GHG emissions.	Electric or compressed air driven operations can displace or increase combustion emissions.	
Use "low" or "no bleed" gas operated pneumatic devices/controllers.	Reduces VOC and GHG emissions.		Required by COGCC and by CDPHE in non-attainment areas.
Use closed loop system or thermal combustion for gas operated pneumatic pump emissions.	Reduces VOC and GHG emissions.		

Table VI-1 Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development

Emission Reduction Measure	Potential Environmental Benefits	Potential Environmental Liabilities	Feasibility
Install or convert gas operated pneumatic pumps to electric, solar, or instrument (or compressed) air driven pumps.	Reduces VOC and GHG emissions.	Electric or compressed air driven operations can displace or increase combustion emissions.	
Install vapor recovery on truck loading/unloading operations at tanks.	Reduces emissions of VOC and GHG emissions.	Pressure build up on older tanks can lead to uncontrolled rupture.	
Control Strategies for Fugitive Dust and Vehicle Emissions			
Unpaved surface treatments including watering, chemical suppressants, and gravel.	20% - 80% control of fugitive dust (particulates) from vehicle traffic.	Potential impacts to water and vegetation from runoff of suppressants.	
Use remote telemetry and automation of wellhead equipment.	Reduces vehicle traffic and associated emissions.		Not possible in some terrain.
Speed limit restrictions on unpaved roads.	Reduction of fugitive dust emissions.		
Reduce commuter vehicle trips through car pools, commuter vans or buses, innovative work schedules, or work camps.	Reduced combustion emissions, reduced fugitive dust emissions, reduced ozone formation, reduced impacts to visibility.		
Miscellaneous Control Strategies			
Use of ultra-low sulfur diesel (e.g., in engines, compressors, construction equipment).	Reduces emissions of particulates and sulfates.		Fuel not readily available in some areas.
Reduce unnecessary vehicle idling.	Reduced combustion emissions, reduced ozone formation, reduced impacts to visibility, reduced fuel consumption.		
Reduced pace of (phased) development.	Peak emissions of all pollutants reduced.	Emissions generated at a lower rate but for a longer period. LOP, duration of impacts is longer.	May not be economically viable or feasible if multiple mineral interests.

Appendix A Air Resources Oil and Gas NEPA Analysis Process / Methodology

1) Develop emissions scenarios. The Bureau of Land Management (BLM) field office (FO) staff should encourage proponents to use the BLM Colorado's Emissions Tool to develop the emissions scenarios for the Proposed Action and Alternatives (if applicable & proponent proposed). BLM FO staff or Air Resource Specialists (ARS) may have to develop Alternative emissions inventories for scenarios proposed by the government or public. Both proponents and BLM FO staff can contact Colorado State Office (COSO) ARS for help using the Emissions Tool.

The tool is based on Google's Apps Script technology (a web scripting framework) and therefore works best with the Chrome browser. Google's website indicates that the technology is also supported by the latest two browser editions for all of the other major modern browsers (e.g., Microsoft Internet Explorer 10 & 11). The BLM currently uses Internet Explorer 9, which will NOT render the tool.

2) Evaluate the emissions inventories, including the underlying parameters, specifications, and any assumptions to ensure they are reasonable and comprehensive to fully account for the emissions generating activities and sources of the Proposed Action and Alternatives (if applicable). Example: If an oil & gas proposal called for fracking during completion and proposed pipeline construction in the Surface Use Plan of Operation (SUPO), but the emissions inventories lack estimates from these operations, the inventory would be deemed incomplete and not representative of the proposal/alternative.

3) Compare the emissions inventories and project parameters against the cases below to determine the level of NEPA analysis required.

> Case 1: The estimated annual emissions of any single criteria pollutant (PM_{10}, $PM_{2.5}$, CO, NO_X, SO_X) are less than 2 tons per year. This project is not likely to cause impacts to air quality. The 2 ton threshold is what the State of Colorado requires for Air Pollutant Emission Notice (APEN) submissions and thus anything less than 2 tons is something that air quality regulators have deemed to be negligible (AQCR 3.II.D.I). For all practical purposes the BLM Colorado shall consider these sources to be of a similar nature with respect to NEPA impacts.
>
> NEPA analysis: Dismiss air quality as an issue for further analysis due to the project not having a potential for significant impacts. Incorporate the following language into the issues considered but eliminated from detailed analysis:
>
> *"As required for all oil and gas projects seeking to develop federal minerals administered by the BLM CO, an emissions inventory was prepared for the proposed action (and alternatives, if applicable) which provided the basis for dismissing air quality as an issue to be carried forward for further analysis. The resulting inventories indicate that the proposed action will result in not more than 2 tons per year of emissions (1 ton for non-attainment or maintenance area pollutants) for any criteria pollutant. The BLM has adopted the Colorado Department of Public Health and Environments Air Pollution Emissions Notice thresholds as the basis for which the BLM would not consider additional analysis when emissions are below the threshold. Sources or activities that emit less than a threshold level of pollutants per year are considered negligible for their potential to impact air quality."*

No further analysis or air quality discussion is required, i.e. no affected environment, environmental consequences, or cumulative impacts sections should be present in document.

Case 2: The specific project parameters and associated emissions were previously analyzed (to current standards/thresholds) as part of a larger NEPA analysis (i.e., a parent document), such that the information can be tiered to and incorporated by reference. An example of a parent document might be a master development plan that provided for an analysis (total or portions thereof) that a site specific APD EA could reference.

NEPA analysis: Identify which portions of the previous analysis (affected environment, environmental consequences, and cumulative impacts) are relevant to the current project and incorporate by reference in accordance with the NEPA handbook procedures (H-1790 NEPA Handbook pg. 27). Disclose the emissions inventory results and how they are covered by the previous analysis.

Case 3: The project parameters and associated emissions match those from a previously completed and applicable analysis, such that the information can be incorporated by reference. Case three is different from case two in that the analysis that describes the impacts from your matching project may be from another field office or state (i.e., the analysis is not a direct descendant of an overall parent project document). COSO ARS will assist in collating this data into a repository with descriptions of the emissions, analysis, and results to aid FO staff in finding and applying these analyses as they become available (future tool development).

NEPA analysis: Identify which portions of the previous analysis (affected environment, environmental consequences, and cumulative impacts) are relevant to the current project and incorporate by reference in accordance with the NEPA handbook procedures (H-1790 NEPA Handbook pg. 27). Disclose the emissions inventory results and how they are covered by the previous analysis. In many cases the ARS developed descriptions describing the referenced analysis will provide the basis for drafting the correlations for how the projects are similar and thus why the previous analysis would be applicable and appropriate for disclosing impacts for the current action being considered.

Case 4: The project parameters and associated emissions do not fit within the previous three cases, such that some level of "new" analysis is required.

Tier I Analysis: Run the ARS developed Dispersion Screening Tool to evaluate site specific receptor impacts (emissions inputs are derived from the Emission Tool results). This may be accomplished by FO personnel or with the assistance of COSO ARS staff. If the impacts at "sensitive receptor distances" are acceptable and the project parameters meet the requirements for using the Tier I method, then:

- Obtain the most recent version of the affected environment (derived from annual BLM CO CARPP report - Section V) for your FO from the internal ARS website and paste it into your NEPA document or incorporate the information by reference

(the same data will be available to the public on our external site). The section will contain the most recent annual analysis for air resources indicator values, trends, and issues relevant for the project area.

- Obtain the screening tool methodology and language for acceptable results (basis) from the internal ARS website, and paste it into the environmental consequences section of your NEPA document along with the emissions inventory and screening tool results.

- Obtain the most recent version of the cumulative impacts analysis (derived from the annual CARPP report) for your FO from the internal ARS website and paste it into your NEPA document or incorporate the information by reference (the same data will be available to the public on our external site). The section will contain the most recent annual analysis for cumulative FO development and its relationship to one of the three Colorado Air Resource Management Modeling Study (CARMMS) modeled scenarios (low, medium, high) for Colorado. The section will contain language for the impacts expected under the matching scenario and any required mitigation as a result of those impacts that can be incorporated directly into the FO's cumulative NEPA analysis.

Tier II Analysis: The Tier II method is essentially the same as the Tier I, except that the results at "sensitive receptor distances" are NOT acceptable (i.e., they are above a threshold of concern). Contact the COSO ARS to discuss options.

Tier III Analysis: The project is of significant size or duration (typically an EIS) such that the project parameters do not lend themselves to being adequately analyzed by the methods described in analysis Tier I. Contact COSO ARS staff to discuss site specific analysis or refined modeling options.

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