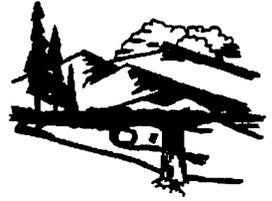




# Department of Environmental Quality



To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

April 3, 2009

Mr. Eric Sundberg  
Newfield Exploration  
1401 17<sup>th</sup> Street, Suite 1000  
Denver, CO 80202

RE: Liquids Gathering System Equivalent VOC Emission Reduction

Dear Mr. Sundberg:

As you know, Newfield is required to demonstrate and implement "a reduction in VOCs comparable to that obtained by the liquids gathering system (Pinedale Anticline Record of Decision, page 28)" in order to satisfy requirements set forth in the Pinedale Anticline Record of Decision (ROD). Clearly, installation of a liquids gathering system would satisfy such a requirement. For companies not installing a liquids gathering system, the Air Quality Division has taken the lead for defining an equivalent VOC emissions reduction.

Installation of a liquids gathering system results in emissions reductions due to the elimination of certain wellhead production equipment (i.e., tanks) and elimination of liquids hauling vehicle miles traveled (VMTs). However, the central gathering and processing facilities needed for such a system also generate VOC emissions. Therefore, all emission increases and decreases associated with a liquids gathering system must be considered in the definition of a liquids gathering system equivalent emission reduction.

Due to the variability among operators in production equipment and the control level associated with that equipment, as well as different liquids hauling practices, I believe a liquids gathering system equivalent emission reduction should be defined individually for each operator.

Please contact me at your earliest convenience to arrange a meeting to discuss Newfield's operations in the Pinedale Anticline. We would like you to provide a detailed list of equipment used in your operations and the associated emissions which would be eliminated through the installation of a liquids gathering system. This list should include production equipment and VMTs from liquids hauling. To address the emissions associated with central gathering and processing facilities, we will discuss development of a generic factor based on air quality permit applications for other liquids processing facilities in the area.

Herschler Building • 122 West 25th Street • Cheyenne, WY 82002 • <http://deq.state.wy.us>

ADMIN/OUTREACH (307) 777-7937 FAX 777-3610	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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Please don't hesitate to call me at (307) 777-7391 or Kelly Bott at (307) 777-6088 if you have any questions. I look forward to hearing from you.

Regards,

A handwritten signature in black ink, appearing to read "D. Finley". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

David A. Finley

Administrator  
Air Quality Division

Cc: Kelly Bott  
Jamie Sharp  
Chad Schlichtemeier  
Brian Bohlmann  
Lori Bocchino  
Chuck Otto, BLM  
Merry Gamper, BLM  
Lauren McKeever, BLM  
Jim Lucas, BLM