

October 1, 2010

To: Pinedale Anticline Working Group

Re: Development of a ten year rolling forecast including projected air emissions in the PAPA

I am requesting the PAWG to recommend to the BLM that the "Industry" adhere to the Record of Decision to provide projected air emissions in a timely manner and provide the PAWG with the information stipulated in the Record of Decision.

The 2008 PAPA ROD (p. 27) provides that Operators will annually develop a ten-year rolling forecast including the projected air emissions from all project related sources in the PAPA.

1. To provide more predictability during the development phase, Operators will annually develop a 10-year rolling forecast or development plan for submission to the BLM and WDEQ-AQD. The forecast or development plan will report the anticipated activity levels and projected air emissions from all project related sources in the PAPA as identified by WDEQ-AQD. The annual forecast will continue through the development period. Operators will meet annually with the BLM and WDEQ-AQD and in consultation with EPA to review the annual forecast and monitoring data and evaluate alternate ways to achieve the visibility impact reduction goal specified in paragraph #4 (below), beyond the 80 percent drilling rig engine NOx emission reductions specified in paragraph #3 (below). Upon consideration of the annual forecast, the BLM and WDEQ-AQD in consultation with EPA will determine any necessary air dispersion modeling to be run by the Operators for the coming year. Modeling will be performed using protocols approved by BLM and WDEQ-AQD in consultation with EPA. Any modeling will be summarized and submitted to the BLM and WDEQ-AQD no later than the 11th month following the annual planning meeting.

The ROD (p. 19) also stipulates that: "The Operator's Annual and 10-year projections will be provided to the PAWG and the PAWG task groups to foster communication with the public."

This is to request that the PAWG recommend to BLM that the 10-year forecast of PAPA emissions for 2009 and 2010 be provided to the public via the PAWG website immediately, and that future annual forecasts be posted there within one month following each Annual Planning meeting.

Susan Kramer
Citizens United for Responsible Energy Development (CURED)
P. O. Box 55
Pinedale, WY. 82941
307-367-2394
susankramer@wyoming.com