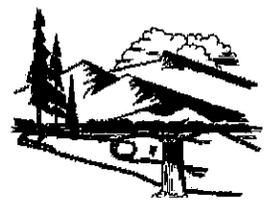




Department of Environmental Quality

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



Matthew H. Mead, Governor

John Corra, Director

MEMORANDUM

To: Shane DeForest, BLM Pinedale Field Office Manager

From: Steven A. Dietrich, WDEQ, Air Quality Division Administrator

Date: November 1, 2011

RE: Request for Adaptive Management Decision to the Pinedale Anticline SEIS ROD

Background:

The Pinedale Anticline SEIS ROD Section 4.4.1 Implementation 6(c) states that:

“[Mitigation Fund will be used to] Supplement WDEQ-AQD’s existing capability to analyze and report on ambient monitoring data, by funding an analyst (1) in WDEQ-AQD’s monitoring group for a period of 2 years, at a cost not to exceed \$160,000 for the two year period”.

Additionally in a letter from John MacDonald, Acting JIO/PAPO Coordinator, to John Corra, Wyoming Department of Environmental Quality (WDEQ) Director, dated June 4, 2010 additional funding in the amount of \$24,778 was granted for this position.

In February 2010, the WDEQ-Air Quality Division (WDEQ-AQD) hired an individual for this analyst position. This position currently manages several air quality and meteorological stations in the Upper Green River Basin and Southwest Wyoming, performs analysis on air quality and meteorology events (such as stratospheric intrusion), analyzes long term monitoring data, assists in winter ozone forecasting, assists in managing winter field studies and monitoring equipment procured with the \$1.25 Million PAPO Monitoring funds, and performs winter meteorological monitoring in the Upper Green River Basin.

The two year period for this position is slated to end in February of 2012. The WDEQ-AQD believes that there is still a need for this data analyst position and the duties performed beyond the two-year period stated in the ROD. The duties this position performs are vital to continuing air quality management efforts, particularly with regard to ozone, in the Upper Green River Basin. Additionally, the increase in monitoring both in the Upper Green River Basin, Southwest Wyoming, and throughout the State of Wyoming since 2008 is substantial and makes it necessary to retain staff in the WDEQ-AQD Monitoring Section. The WDEQ-AQD would like the opportunity to extend the allotted time period and expand the allotted funding specified in the ROD. The WDEQ-AQD has concurrently asked the PAPO Board to allocate \$169,000 to fund this position through June of 2014. The WDEQ-AQD has proposed an adaptive management change assuming the request for additional funds is granted from the PAPO Board to make this process more efficient.



Proposed Adaptive Management Change:

Supplement WDEQ-AQD's existing capability to analyze and report on ambient monitoring data by funding an analyst (1) in WDEQ-AQD's monitoring group until June 30, 2014, at a cost not to exceed \$354,000.

Justification:

The duties assigned to this position are of continued importance to the WDEQ-AQD, the BLM, and the public to properly manage air quality that can be affected by oil and gas development and operations in the Pinedale Anticline field. This position contributes substantially to the WDEQ-AQD's winter monitoring and forecasting activities. This position is part of AQD's forecasting team that issues daily updates on weather conditions conducive to forming ozone in the Upper Green River Basin. This position also performs winter monitoring activities in the field to identify meteorological and air quality conditions present when ozone is formed. Other duties include managing year-round operations of long-term air quality monitoring in the Upper Green River Basin and assistance in implementing projects related to the \$1.25 Million in monitoring funds that was also granted by the Pinedale Anticline SEIS ROD. Another important responsibility of this position is to perform air quality and meteorological analyses for unique events, such as stratospheric intrusions, which allow the WDEQ-AQD to differentiate between locally formed ozone and stratospheric ozone.

Between the end of 2008 and November 2011, the AQD Monitoring Section has added eight (8) new monitoring stations housing nineteen (19) new ambient air quality monitors and eight (8) new meteorological towers in Southwest Wyoming. This position has the responsibility of overseeing seven (7) of these new stations, plus four (4) existing stations in Southwest Wyoming.

If this position was not continued, the duties discussed above would be distributed among the remaining staff in the Monitoring Section. This would place an additional strain on the WDEQ-AQD monitoring staff that currently have a full to overflowing workload. Since 2008, the Monitoring Section's oversight of air quality and air quality related value monitors has expanded by 37% which includes monitoring throughout the State of Wyoming. The WDEQ-AQD management would need to evaluate discontinuation of monitoring due to the shortage of staff resources.

Decision:

Due to the issues detailed above, it is my decision to grant this adaptive management decision by amending language to extend the analyst position through June of 2014 at an amount not to exceed \$354,000. The BLM will continue to work cooperatively with the WDEQ-AQD to ensure resource needs are met to continue monitoring work necessary as detailed in the Pinedale Anticline SEIS ROD.

Shane DeForest, BLM Pinedale Field Office Manager