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 2, 2007

Mr. Matt Anderson
BLM Project Lead
Pinedale Field Office
PO Box 768
Pinedale, WY 82941

Dear Mr. Anderson:

We have evaluated the Draft Supplemental Environmental Impact Statement (DSEIS) prepared by BLM for the Pinedale Anticline Project Area (PAPA), from the perspective of impacts that the preferred alternative may have on air quality in the Upper Green River Basin and surrounding areas. Three of the project proponents, Ultra, Shell and Questar, have identified additional emission reductions to minimize the impact of the project on air quality in response to the Department of Environmental Quality's challenge to those companies. We should note that Ultra, Shell and Questar have made it clear in discussions with the Department that their commitment to accelerate the 80% drill rig engine NOx emission reductions, which is reflected in the Department's comments below, depends upon BLM issuing the SEIS ROD no later than by mid-year 2007.

AQ-1 SA-3-1 DEQ believes that if the following mitigation measures were addressed, the PAPA project could be undertaken without creating unacceptable air quality impacts.

1. To provide more predictability during the development phase, operators will annually develop a ten-year rolling forecast or development plan for submission to BLM and DEQ's Air Quality Division (AQD). The forecast or development plan should report the anticipated activity levels, and projected air emissions from all significant emitting units including compression for each year during the upcoming ten year period. We believe that this annual forecast should continue through the end of the development period. Operators will meet annually with BLM and AQD to review monitoring data and evaluate alternate ways to achieve the visibility impact reduction goal specified in paragraph #4, beyond the 80% rig engine NOx emission reductions specified in paragraph #3.
2. No later than one year after signing of the ROD, operators will adopt air emission strategies which reduce predicted visibility impacts to 2005 predicted levels which are modeled to result in no more than 45 days greater than 1.0 deciview of visibility

impairment. This would provide an almost immediate reduction of predicted visibility impacts from current development.

3. Ultra, Shell and Questar will accelerate the use of advanced technologies to reduce drill rig engine NOx emissions to reduce predicted visibility impacts to the 80% drill rig engine NOx emissions reduction scenario as described in the DSEIS, which is modeled to result in no more than 10 days greater than 1.0 deciview of visibility impairment. Such reductions shall occur no later than the end of year 2010 (or 42 months following signing of the ROD), instead of the five-year period proposed under the DSEIS. To ensure that such drill rig emission levels are enforceable, AQD would establish permitting requirements for all rig engines operating in PAPA.
4. During annual planning sessions as specified in paragraph #1, operators, AQD and BLM will collaboratively identify methods to reduce air emissions beyond the 80% drill rig engine NOx emissions goal. No later than the fifth annual planning session following signing of the ROD, operators will submit to the collaborative group an evaluation of alternatives, and recommend a plan that addresses all sources from project activities, and whose aim is to meet a predicted visibility impact objective of no more than zero days greater than 1.0 deciview of visibility impairment. The operators' evaluation will identify the expected reduction in predicted visibility impairment which can be achieved by each alternative as well as an implementation schedule. No later than the sixth annual planning session following signing of the ROD, the collaborative group, with input from Wyoming Game and Fish Department, will select and operators will begin to implement a plan which minimizes any adverse wildlife or other impacts, is technically and economically practicable, and is as close as is reasonably possible to the goal of zero days greater than 1.0 deciview of predicted visibility impairment. The collaborative group will also specify a schedule for completely implementing the plan.
5. All operators will comply with AQD permitting regulations to establish emission limitations for production equipment and compression facilities and will voluntarily institute any other emission reduction measures that have been proposed as part of the alternate method selected by the collaborative group.
6. Ultra, Shell and Questar will fund the following additional activities, to be carried out by AQD:
   a. Supplement AQD's existing Jonah Interagency Office (JIO) field inspection staff by adding an inspector dedicated to monitoring compliance in PAPA for a period of five years, at a cost not to exceed $400,000 for the five-year period.
   b. AQD will conduct a formal "network assessment" of the adequacy of the existing ambient monitoring network in southwest Wyoming. Based on the results of the "network assessment", Ultra, Shell and Questar will provide a funding contribution to AQD not to exceed $1,250,000 over a five-year period to establish and/or operate monitors recommended by the "network assessment" for pollutants of interest from the PAPA project. AQD will, to the extent practicable, use monitor data collected by any new, and all existing local monitors, in performing future air quality modeling. AQD and operators will cooperate to collect ambient ammonia data for use in modeling, including modeling to evaluate the adequacy of alternate emission reduction options required under paragraph #4.
   c. Supplement AQD's existing capability to analyze and report on ambient monitoring data, by funding an analyst (1) in AQD's monitoring group for a period of two years,

at a cost not to exceed $160,000 for the two-year period, and providing $200,000 as a contribution to the expected costs of $400,000 to allow AQD to upgrade its ambient air quality data management systems. AQD would agree to use such staff and funds to improve its ability to analyze data to more effectively disseminate those data to the general public, and to use ambient monitor data in future air quality modeling associated with the project.

7. The DSEIS ozone air quality analysis was conducted under NEPA for the purposes of allowing BLM to evaluate and disclose potential environmental impacts from the project. AQD has embarked on further evaluation of ozone formation in the Upper Green River Basin, including the PAPA, through a field study and modeling project to understand previously monitored elevated ozone events and gather additional information. It should be noted that to date, there is no finding of an ozone air quality standard violation at the monitoring sites adjacent to the PAPA. The results of the field study and modeling project will form the basis for AQD to develop strategies to manage ozone formation in the Upper Green River Basin to ensure that the area remains in compliance with current and future Wyoming Ambient Air Quality Standards for ozone.

Thank you for the opportunity to submit comments on the Draft SEIS.

Sincerely,

John Corra
Director

cc: Robert A. Bennett, WY BLM State Director
Governor's Planning Office
David Finley, Air Quality Administrator
Darla Potter