

ATTACHMENT C

Clarification of Air Quality Commitments

Proponents respectfully object to BLM's revision of the Proponents/WDEQ agreed-upon drill rig engine NOx emission plan. This plan was submitted to BLM verbatim by the WDEQ and Proponents and is based upon concurrence between Proponents and the agency of jurisdiction, the WDEQ.

The Proponents have proposed in conjunction with its year-round development proposal that drill rig engine NOx emissions be reduced to 2005 levels within one year of a ROD and then an additional 80% over the next forty-two months after BLM issues the ROD. These emission reductions demonstrate compliance with all federal and state air quality requirements and reduce visibility concerns. This offer accelerates benefits to air quality by a year and a half versus Alternative C air quality requirements in the DSEIS and RDSEIS.

Please see Attachment F of this letter for previously submitted comments on the "any and all available means" language. See text in this comment letter of comments to similar BLM language on Alternative D.

The Proponents commit to the following additional air mitigation measures to be incorporated into Alternative D and which can be undertaken without creating unacceptable air quality impacts.

1. "To provide more predictability during the development phase, Proponents will annually develop a ten-year rolling forecast or development plan for submission to BLM and WDEQ 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. This annual forecast should continue through the end of the development period. Proponents 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, Proponents will adopt air emission strategies reducing 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. Proponents 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 and RDSEIS, 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 42 months following signing of the ROD instead of the five-year period proposed under the DSEIS and RDSEIS. To ensure that such drill rig emission levels are enforceable, Proponents understand WDEQ-AQD would establish permitting requirements for all rig engines operating in PAPA.
4. During annual planning sessions as specified in paragraph 1, Proponents, 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, Proponents 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 Proponents' 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 Game and Fish will select and Proponents 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. The mitigation and monitoring fund would be used to pay for 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 the 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," Proponents 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 the Proponents 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. A DSEIS and RDSEIS 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.”

Proponents also recommend that future modeling incorporate available measured data. Please see Appendix E comments on modeling, regulations and jurisdictions on air quality. Except for the page numbers, the comments are still pertinent to the RDSEIS.

While greenhouse gases are not currently regulated by WDEQ and EPA, components of the Proponents’ proposed mitigation result in reduced greenhouse gas emissions. For example, the LGS will result in reduced truck trips, thus less carbon dioxide emissions will result from reduced diesel combustion in truck engines. Also, in lieu of combusting flash gas as a waste from the condensate storage tanks as currently required by WDEQ for control of these emissions, carbon dioxide and methane emissions will not be generated at the well site because flash gas will be recovered as a resource at the LGS facility. Furthermore, evolving Best Available Control Technology (BACT) requirements from WDEQ for oil and gas facilities in the Jonah / Pinedale fields result in reduced greenhouse gas emissions by requiring more control of VOC emissions which also includes methane.