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April 8, 2015

Wyoming Department of Environmental Quality, Air Quality Division Herschler Building 2-E 122 West 25th Street Cheyenne WY 82002

Proposed Rulemaking R24 WDEQ-AQD Docket Number 15-21, Revising Wyoming AQ Standards and Regulations

Comments: From Linda J. Cooper, President

SDSBT is a citizens organization committed to the sustainability of the Bridger-Teton National Forest as a local resource and an essential part of the Greater Yellowstone ecosystem.

In accord with our mission, SDSBT has commented frequently and continually since 2004 at public meetings and in writing as our scientific and public policy capabilities were applied to the foreseeable consequences of rapid oil and gas development in the areas in and around Pinedale. Unfortunately, our predictions were correct: unchecked and inadequately regulated oil and gas operations caused declining air quality in this pristine Wyoming environment. This in turn threatens public health and safety. Wyoming winter ozone pollution forced children to stay indoors and adults to reduce outside activities. This was a harbinger of things to come, not only in Wyoming, but nationally as fracking technology has spread oil and gas development across the US with the same and other environmental and public health consequences.

SDSBT is pleased that the DEQ is taking these long overdue steps to revise the rules and regulations affecting existing sources of pollution. SDSBT also sees these are but the first baby steps to assure that at least the existing equipment and facilities tighten up existing sources of pollution. We support the rulemaking that addresses pumps, compressors and other in-place oil and gas equipment employing LDAR (leak detection and repair); controls that will both reduce ground level ozone and reduce greenhouse gases. We acknowledge this step forward, and support the rulemaking.

Linda J. Cooper

President