

Powder River Basin Resource Council

Comments from the Powder River Basin Resource Council regarding new rules.



November 15, 2016

Nancy Vehr, Administrator
Air Quality Division,
200 West 17th Street,
Cheyenne Wyoming, 82002

submitted via DEQ electronic comments

Re: New source performance standards, involve incorporating 40 CFR part 60, subparts OOOO, OOOOa and TTTT into the WAQSR by reference from the CFR.

We commend the Wyoming Department of Environmental Quality, Air Quality Division's recommendation to adopt rules that would further reduce emissions of air pollutants such as methane and other volatile organic compounds from oil and gas development. This rule would do much to protect Wyoming's air quality and to protect our state's residents from harmful emissions.

However, we think these rules should be strengthened by applying statewide the existing oil and gas requirements for the Jonah Pinedale fields. Currently, Wyoming air quality meets national health-based standards for ozone but when oil and gas activity ramps up in eastern Wyoming, particularly in Laramie, Converse, and Campbell Counties, their air quality will likely exceed these ozone standards. Applying today's Jonah Pinedale standards to all of Wyoming would avoid negative health impacts from emissions in the rest of the state.

We also recommend that Wyoming DEQ make these new rules apply to all existing oil and gas facilities, rather than just new facilities. Finally, DEQ should also expand quarterly leak detection and repair requirements to apply to existing sources statewide. Leaks are the second largest source of oil and gas emissions in the state, after flaring and venting. This change would significantly reduce these harmful emissions.

We thank the Wyoming Department of Environmental Quality, Air Quality Division for proposing to adopt these new rules and ask that the Environmental Quality Council go even further to curb emissions from oil and gas facilities and protect the public health of Wyoming's citizens.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob LeResche", followed by a long horizontal flourish.

Bob LeResche
Chair, Powder River Basin Resource Council