

Lucky Lambdin

To whom it may concern: The Wyoming Department of Air Quality Division's recommendation to incorporate and adopt by reference the EPA's recent rules to reduce oil and gas emissions of methane and smog-forming volatile organic compounds and air toxics is the right course. The proposed adoption of the new EPA rules is also a requirement in order for Wyoming to maintain primacy. Wyoming DEQ should go further and take the lead to make these new rules apply to all old and existing oil and gas facilities not just new facilities. We understand EPA is working on a rule that would require this in the near future and we believe Wyoming has been and should continue to be a leader in this area. There is nothing in the EPA rules that prevents Wyoming from establishing more stringent standards and making these rules apply to existing oil and gas facilities. DEQ should go further and expand the oil and gas emission and pollution reduction requirements that are required in the Jonah Pinedale area to apply across Wyoming. EPA recently reduced the 8-hr ozone standard so it is time for Wyoming to get ahead of the pollution that occurred in the Pinedale area and prevent it from happening in other oil and gas production areas. While the air quality outside of the Jonah Pinedale area currently meets national health-based standards for ozone the oil and gas permitting, the oil and gas activity in eastern Wyoming and particularly in Laramie, Converse and Campbell county puts several Wyoming counties close to exceeding the ozone standard. It is a wise move for the DEQ to strengthen and expand the existing Pinedale oil and gas requirements statewide. DEQ should also strengthen Wyoming state rules, by expanding quarterly leak detection and repair requirements and making those rules address emissions from existing sources statewide. Lucky Lambdin. Sheridan, Wyoming.