

## Excerpts from the Greater Yellowstone Area Air Quality Assessment April 2005 Update

In April 2005, a panel of state and federal scientists, the Greater Yellowstone Clean Air Partnership, issued a report indicating rapid energy development in the Upper Green River Valley could pose serious risks to the air quality of the Greater Yellowstone area. Nitrous oxide (NO<sub>x</sub>) emissions, mostly from diesel drill rigs, have proven to be far higher than the levels anticipated by the Bureau of Land Management when it authorized the Jonah and Pinedale Anticline gas fields. Moreover, Anticline NO<sub>x</sub> emissions long ago breached the 693-ton trigger for additional air-quality analysis, which the BLM has yet to initiate. The panel estimated the Anticline gas field released more than 2,700 tons last year. The Forest Service, meanwhile, has insufficient resources to continue its 20-year program to monitor air quality over nearby Wilderness areas. Below are **excerpts related to energy development**, pages 4 to 8.<sup>1</sup>

**Current drilling activity:** In the Jonah II field, the ROD [Record of Decision] (BLM, 1998) authorized the drilling of 450 wells over a 15-year period. After five years of drilling, the project is almost drilled out at the 450 well level. The pace of development and associated emissions (construction, drilling and production) is three times faster than originally proposed. The BLM ROD for the Jonah field assumed drill rigs would use engines rated at 1,000 horsepower (hp) per drill rig. In reality, the drill rigs being used are approximately two and one-half times larger. Emissions related to drilling with larger engines and at a faster pace have resulted in actual NO<sub>x</sub> emissions approximately 6 to 8 times greater than originally proposed for the Jonah Project.

In the Pinedale Anticline Project Area similar fast paced development is occurring. In the original air quality analysis for this project (BLM, 1999), it was assumed that only eight 1,000 hp drill rigs would be operating at a time. In reality, the pace and engine size is much higher, with approximately double the number of drill rigs at three to four times larger in size. The resulting NO<sub>x</sub> emissions are considerably higher than originally analyzed for the Pinedale Anticline Project EIS.

**Effects on protected airsheds:** In the original analysis for the Pinedale Anticline Project (DEIS), an increase of 2,000 tons of NO<sub>x</sub> per year was cited to have significant impacts to visibility in the Bridger Wilderness area. These emissions do not include the higher emission rates coming from the adjacent Jonah field so cumulative emissions and impacts are much greater....The Wind River Range Lake chemistry data indicates a decreasing trend of acid neutralizing capacity... Some long term lakes are storing more nitrates which may lead to eutrophic conditions. A rigorous analysis of the lake data is needed to determine the significance of these trends.

**Monitoring funding issues:** The fast paced energy development in Wyoming and Colorado has stretched Regional and Forest Air Quality staffs to capacity. ... Many smaller projects (EAs) are not reviewed. Additional staffing is needed to insure that adequate attention is given to protect the air quality in wilderness areas the USFS is mandated to protect.

The Bridger-Teton and Shoshone Forests will be facing a shortfall of \$160,000 for [fiscal year 2006] (and beyond) if the air quality monitoring is to be continued. The monitoring funding challenges come at a time when energy development and emissions are rapidly increasing in [southwest] Wyoming adjacent to Class I areas. A major concern is the potential discontinuation of monitoring that has been in place for 20 years at a time when emissions are at their highest levels and are expected to increase in the near future. Discontinuation of this monitoring risks a perception that the USFS [is] not committed to protecting air quality in the Class I areas and Wilderness areas as mandated to do by the Clean Air Act and the Wilderness Act.

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<sup>1</sup> This summary was prepared for the Upper Green River Valley Coalition. See [www.uppergreen.org](http://www.uppergreen.org) or call Linda Baker for more information at 307-367-3670 or email: linda@uppergreen.org.