

Upper Green River Valley Coalition

What Should be Done to Confront Our Air Quality Problems

UNDERSTANDING THE PROBLEM: HAZE AND HARM TO HUMAN HEALTH

Reversing the slide in the Upper Green River Valley's air quality will require both voluntary measures from the energy industry as well as tough actions on the part of government. Oil and gas activities release hundreds of tons per year of nitrous oxide and other industrial pollutants into the once-pristine air above our Valley and its surrounding mountains, according to environmental reviews of energy projects. Without a coherent system of data collection and analysis, however, we cannot know the extent to which natural-gas extraction degrades a resource whose value is beyond price. The Upper Green River Valley Coalition, which represents the interests of local residents, business people, hunters and conservationists, insists industry, BLM and environmental regulators grapple with emissions before our air becomes too sick to heal.

The energy industry, which siphons at least \$2 billion worth of natural gas from under the Upper Green every year, is the greatest single source of air pollution here. Yet this environmental impact has to date received minimal attention from regulatory and land-management agencies, even as the Bureau of Land Management prepares in 2005 to authorize many thousands of new wells over the next decade. Haze increasingly obscures the views across the Valley, the mountain vistas and the stars' brilliance. Monitoring shows that acid rain is affecting the lakes of the Bridger Wilderness (although some are not ready to blame this trend on energy extraction), and that air pollutants pose an increasing assault on our lungs.

TRACKING THE PROBLEM: MONITORING EMISSIONS AND AIR QUALITY

The Forest Service has monitored air pollutions' effect on remote lakes in the Wind River Range since 1984. But only recently have officials begun to measure pollution suspended in the air in the Valley. Monitoring stations were installed in two locations last year, and a third will be established in May 2005 near the town of Daniel. This limited and piecemeal approach to monitoring must be replaced with a coordinated, long-term, multi-agency program. Computer modeling by itself will not get the job done. Considering industry's record profits and the surplus revenue the state of Wyoming is reaping from energy production, lack of funding should never be an obstacle to measuring this industry's impact on air quality. Industry, along with state and federal revenue generated by energy extraction in Wyoming, should be tapped to create a secure, adequate funding source. This money can be used to establish and operate an extensive network of monitoring stations and to underwrite a coherent system of data collection and processing.

Monitoring stations should measure sulfur dioxide and small particulate (particles smaller than 2.5 microns), in addition to carbon monoxide, large particulate, ozone and nitrous oxides that are currently being measured. The interpretation of air-quality data should be shared with the public regularly and should be used to help guide energy development far into the future. BLM should compile regular gas-field activity tracking reports that give traffic and compression volumes as well as drilling rates. The agency has yet to provide annual NOx emission reports as promised in the Anticline's 1999 Record of Decision. These reports must become a priority.

FIXING THE PROBLEM: RESTORING OUR CLEAN AIR

The Upper Green River Valley Coalition addressed air quality issues in its *Responsible Energy Development* proposal, a document produced to help guide BLM officials in their revision of the Resource Management Plan for the 1.2 million-acre Pinedale area (see www.uppergreen.org to view this proposal). The Coalition calls for prioritizing the restoration and protection of air quality over the Upper Green and neighboring Wilderness areas. Industry expects to reap billions in profit from the Upper Green. Employing the cleanest technologies should be considered a reasonable requirement of doing business here. Several companies with extensive operations in the Upper Green are voluntarily setting good examples and have shown that these practices are both technologically and financially feasible. Current emission-control technology, however, needs improvement and industry should work to advance so-called best available control technology (BACT).

The Coalition's *Responsible Energy Development* plan calls for requiring BACT on all gas-well operations. Additionally, the plan insists BLM require that industry:

- Reduce particulate emissions through timely reclamation of disturbed areas.
- Phase out flaring through the use of "green" (flareless) well completions. In the meantime, flared and other waste gases should be defined as "air emissions" for purposes of regulation.
- Use low-emission diesel drill rigs.
- Cluster infrastructure, which will reduce surface disturbance and pipe mileage.
- Bus rig crews to drill sites and use telemetry to monitor production sites, which would reduce levels of dust raised by traffic.
- Retrofit heavy-emitting production facilities, such as pipelines, compressors and dehydrators, with new capture equipment as it comes available.

BLM should also adopt recommendations submitted by the Pinedale Anticline Working Group, an advisory panel comprised of industry, government and community representatives.

Finally, there needs to be coordinated regulation of industrial emissions, addressed on a regional scale. The Wyoming Department of Environmental Quality and the federal Environmental Protection Agency must adhere to a more aggressive interpretation of Clean Air Act standards and impose tougher rules on certain "criteria" pollutants. Operators who don't try to exceed these standards are not welcome here. BLM should build in permit requirements that slow the pace of drilling when certain air-degradation thresholds are approached. After all, Wyoming's fresh air is special and deserves stronger standards than those formulated for states whose air has been fouled for decades.

FOR MORE INFORMATION: visit www.uppergreen.org.

- Upper Green River Valley Coalition: Linda Baker, Linda@uppergreen.org, 307-367-3670
Lauren McKeever Lauren@uppergreen.org, 307-367-8472
- Tom Darin, Jackson Hole Conservation Alliance, tom@jhalliance.org, 307-733-9417
- Peter Aengst, The Wilderness Society, peter_aengst@tw.s.org, 406-586-1600
- Lloyd Dorsey, Greater Yellowstone Coalition, ldorsey@greateryellowstone.org, 307-734-6004
- Bruce Pendery, Wyoming Outdoor Council, bpendery@pcu.net, (435) 752-2111