



More wells under new rules would improve Sublette air, officials say

By CHRIS MERRILL
Star-Tribune environment reporter

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PINEDALE -- It might seem like an absurd argument to make:

If operators are allowed to drill 4,400 new gas wells in the Pinedale Anticline, the field will create less air pollution than it currently does with fewer than 1,000 wells.

But that's precisely the line of reasoning put forth Thursday by officials with both the federal Bureau of Land Management and the state's Department of Environmental Quality.

DEQ Director John Corra acknowledged that the argument is counter-intuitive. But he said the approval of proposed new rules for field development would give the state more authority to regulate rig emissions, and would require operators to pollute a lot less.

"Take the average (nitrogen oxides) emissions from the current fleet, compared to a fleet required to meet emissions goals," Corra said. "You can drill seven wells with newer technology rigs and produce the same amount of NOX emissions as you do when you drill one well with the old technology."

DEQ and the Environmental Protection Agency have been working with the BLM in recent weeks as it amends its proposed development plan for the Pinedale Anticline.

EPA effectively gave the BLM a failing grade on its most recent draft. And DEQ, as well as hundreds of area residents, expressed concerns about the proposal, which would allow operators year-round access to the field, among other things.

But DEQ officials told Sublette County residents, during a public meeting in Pinedale earlier this week, that the amended draft will better address concerns about air quality and water pollution.

And even though the number of allowable gas wells would essentially quintuple under the new regulations, the emitted amounts of potentially hazardous air pollutants would be reduced overall, they told the crowd.

Asked Thursday to explain, in greater detail, why they believe this cutback would occur under the new rules, the officials said the reductions would come because industry would be required to implement a variety of positive changes to drilling equipment and field activities. And the state would gain greater regulatory control over emission sources.

Drilling rigs are classified as "mobile" sources of air pollution, and as such, the state does not have the authority to regulate emissions from those rigs unless they are stationary for more than 12 months.

But leaseholders on the Pinedale Anticline have volunteered to submit to state regulation of drilling rig emissions, if the BLM's rule changes are adopted, Corra said.

Reducing ozone-forming pollution

Wintertime ozone spikes have become a recurring problem for the Pinedale region, and the DEQ has decided that "business as usual" on the Pinedale Anticline is no longer acceptable, Corra said.

Emissions from drilling and extracting operations must be curbed, he said.

Nitrogen oxides and volatile organic compounds such as gas vapors are the pollutants that react with each other and with sunshine to create ozone.

DEQ has recorded ozone spikes in the Pinedale area during the wintertime since 2005. This winter the agency issued five ozone warnings for the area. But reducing the precursors to ozone should reduce ground-level ozone formation, said Dave Finley, a DEQ air quality expert.

According to Finley, the primary sources of nitrogen oxides on the Pinedale Anticline are the rig engines. The BLM's 2000 "record of decision" for the field doesn't have any enforceable limits on those emissions, Finley said, and if drilling were to continue with the current fleet of rigs, the field would be emitting 4,400 tons of nitrogen oxides per year by 2015. In 2006 the field emitted more than 2,200 tons.

But the BLM's revised rules would require operators to use newer rig technology, and, as a result, the field would produce no more than 526 tons of nitrogen oxides per year, within three years after the completion of the new record of decision -- even with 5,100 wells, Finley said.

He said nearly all the wells on the field would be required to be tied in to a liquids gathering system, which would significantly reduce the emissions of volatile organics -- the other pollutant that helps make ozone.

Currently gas condensate is collected in barrels at each well, and there's a fleet of trucks, Finley said, that repeatedly drives out to these tanks, collects the condensate, and drives away. As the condensate is transferred from the barrels to the trucks, all of the gas vapors

inside the trucks are displaced as the trucks fill up with liquids.

The liquids gathering system would eliminate that process.

These vapors are volatile organics, he said, and in 2006 about 1.5 millions barrels of condensate were hauled out of the Pinedale Anticline field in trucks -- resulting in 120 tons of volatile organics emissions from this kind of displacement.

"All of that by the simple act of filling the trucks up with condensate," Finley said. "All of those (volatile organic compounds) will be eliminated (if the new rule is adopted)."

The proposed liquids gathering system would cut the emissions of volatile organics by about one-third from current levels, Finley said, even though there will be more wells. New, and enforceable, requirements that operators use the best available technology on things including well pumps would reduce vapor pollution by yet another third.

All told, and even with more wells, the emissions of volatile organics three years after the new rules are adopted would be two-thirds lower than they currently are, Finley said.

Empty promises?

Linda Baker, coordinator of the Upper Green River Valley Coalition, is skeptical about these claims.

It would take a serious revision of the BLM's latest draft proposal to realize the kinds of reductions DEQ officials are talking about, Baker said.

"All we have now is a vague promise from the operators," she said. "We also really have no assurance from the BLM that they will require the newest technology to get us to that point."

If the agencies are sincere about reducing emissions, Baker said, the final decision document would have to be more specific about its requirements and would have to somehow ensure that operators will comply with its stipulations.

And the BLM will have to be sincere about requiring compliance.

"Talk is cheap. I would like to see a list of the technologies that they will use, including those that will address truck emissions, leaks from pipelines, all of the engines on site, including compressor emissions," Baker said. "Will they reduce unnecessary truck traffic? These are the kinds of questions they've yet to address."

DEQ officials admitted at this week's Pinedale meeting, Baker said, that they currently have no way to correctly model ozone formation for the region. Until they figure out how to do that, Baker asked, how could they possibly know if the steps they're proposing will have the desired effect of reducing ozone levels?

