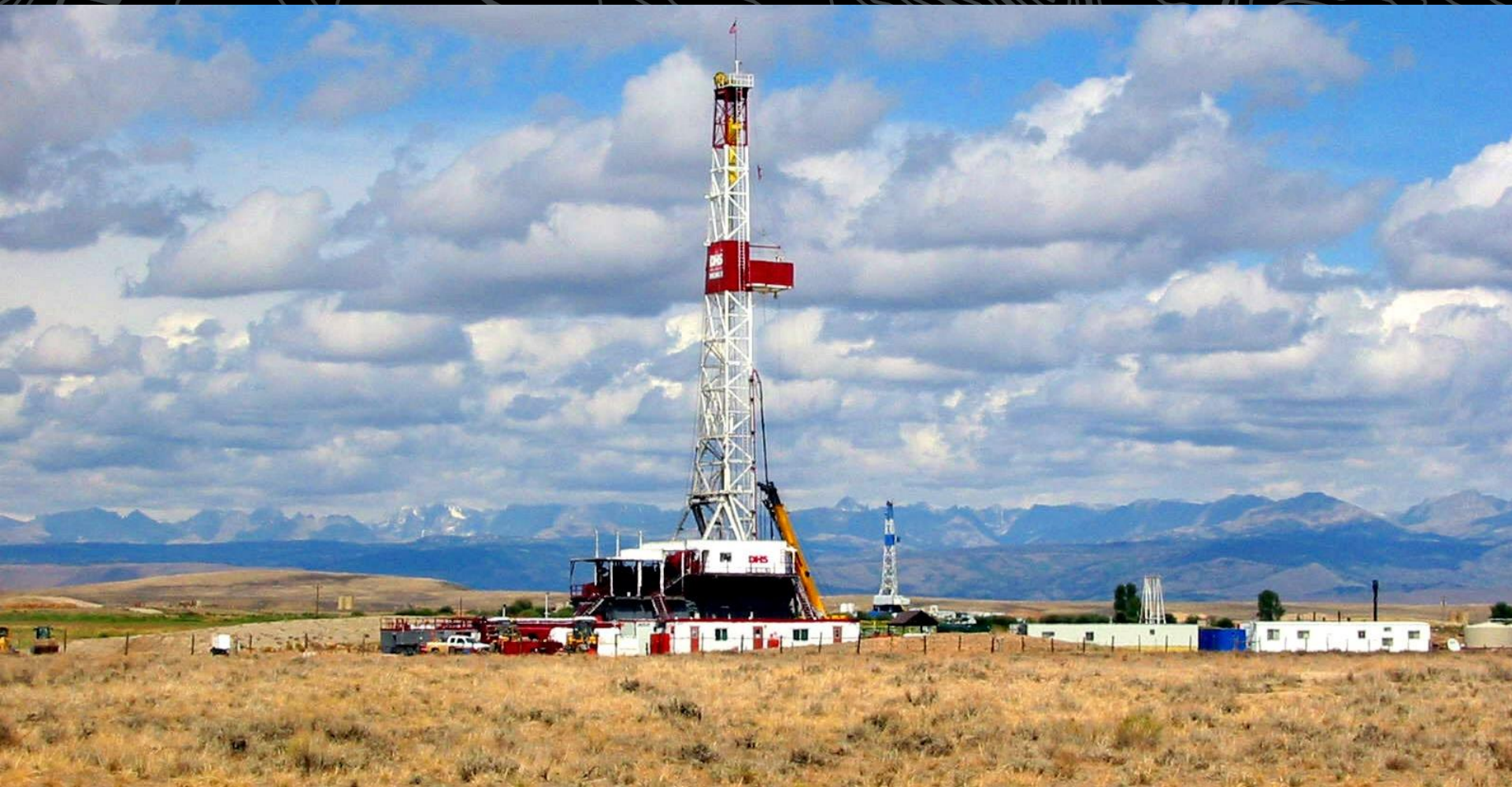




U.S. Department of the Interior
Bureau of Land Management

Pinedale Field Office
April 2021

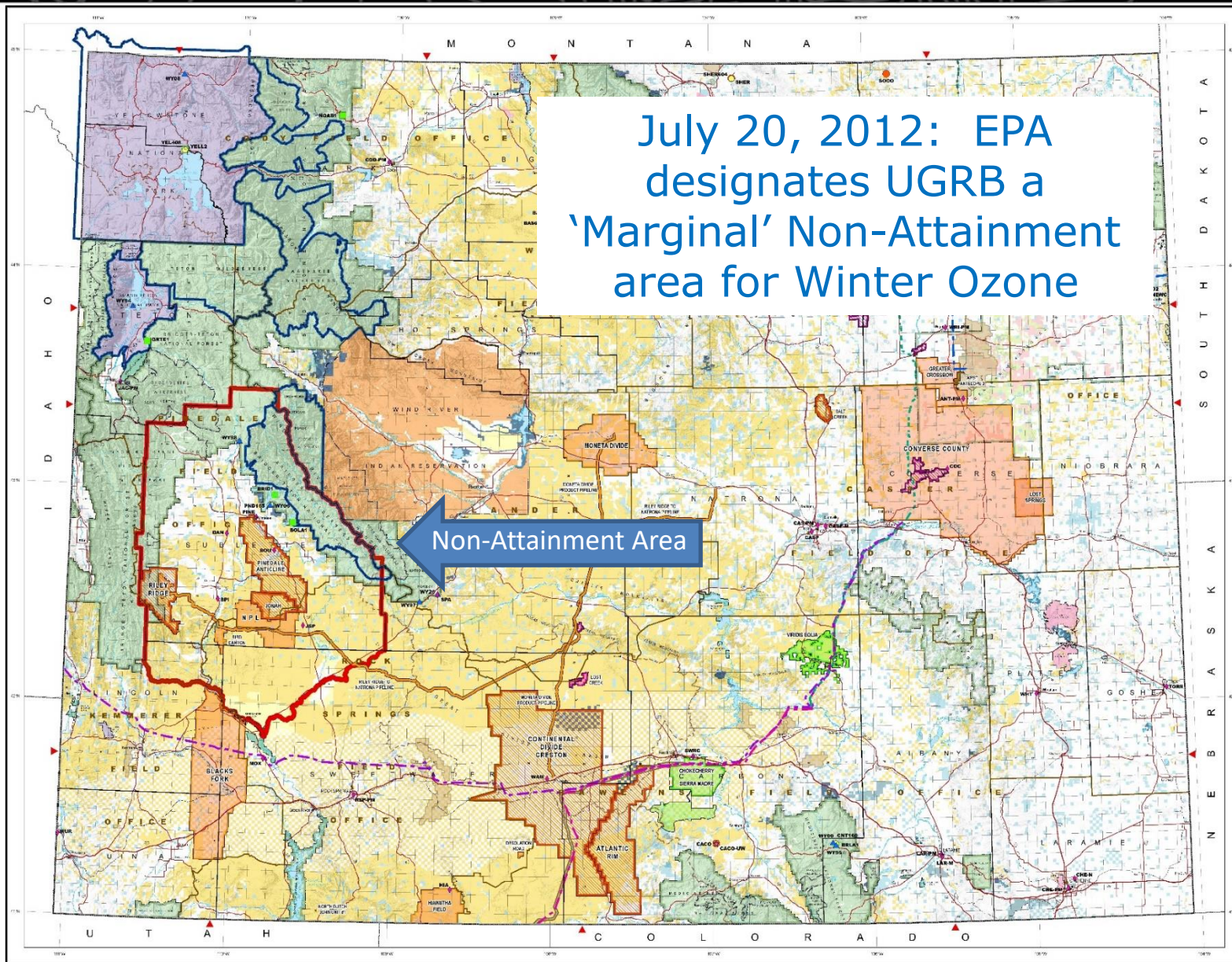
Ozone 'Marginal' Non-Attainment Area Overview





July 20, 2012: EPA
designates UGRB a
'Marginal' Non-Attainment
area for Winter Ozone

Non-Attainment Area

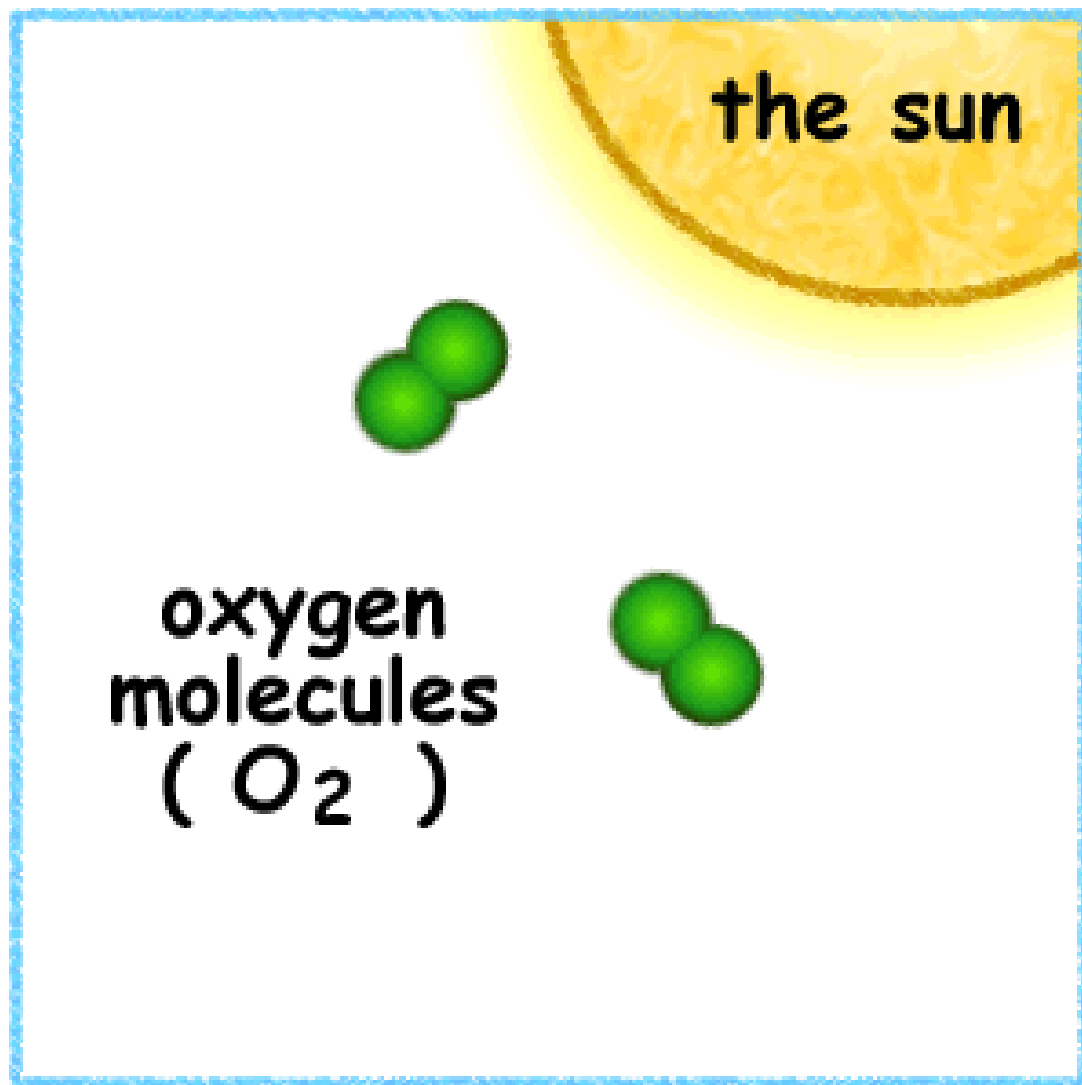




Causes of Winter Ozone Formation

Photochemical process that occurs when there are:

- NO_x and VOC emissions
- Sunlight
- Temperature Inversion-
[cold winter days]
- Adequate Snow Cover-
[reflects sunlight and mimics summer days]
- Stagnant conditions-
[little or no wind]





Non-Attainment Designation

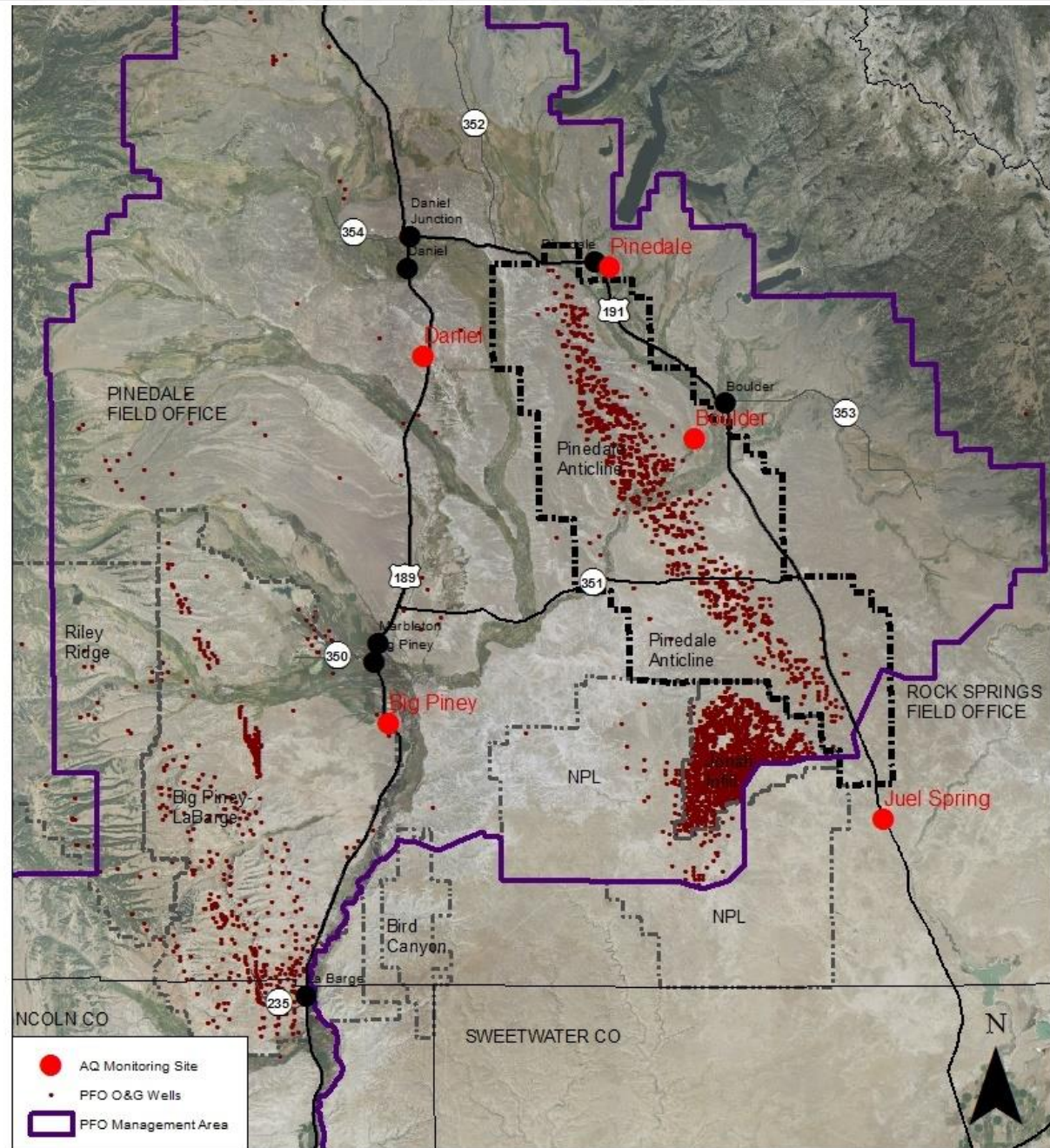
- Wyoming
Department of
Environmental
Quality-Air Quality
Division (WDEQ) is
responsible for
bringing area back
into attainment
through a State
Implementation
Plan (SIP)





6 Air Quality Monitoring Sites

- Pinedale
- Daniel
- Boulder
- Big Piney
- Juel Spring
- (South Pass)





WDEQ Ozone Action Days



January through March
Implement Contingency Plans upon one-day notice



Oil & Gas Ozone Contingency Plans

- 29 Action Items to reduce NO_x and VOCs
- Examples:
 - Notify all personnel/contractors upon WDEQ notification
 - Defer nonessential construction/maintenance activities
 - Shut in production of uncontrolled facilities
 - Minimize vehicle and engine idling
 - Minimize use of ancillary equipment
 - Defer blowdowns/pipeline pigging



Non-Oil & Gas Ozone Contingency Plans

- List of 16 Action Items to Reduce NO_x and VOCs
- Examples that BLM follows:
 - Notify all personnel upon WDEQ notification
 - Defer all non-critical field work
 - Defer travel for 24 hours or until advisory is lifted
 - Delay fueling of all vehicles until after 6:00 pm
 - Minimize vehicle idling
 - Reduce driving speed by 5 mph



Non-Attainment Designation

- July 20, 2013: BLM must comply with General Conformity regulations for any proposed project or activity on federal lands



General Conformity in a Nutshell

BLM must ensure that any activity it permits, authorizes, or licenses conforms to Wyoming's (SIP)

- *Estimated emissions below de minimis levels (100 tons/year of NO_x or VOCs) or must offset emissions*
- Will not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS)
- Will not cause a delay timely attainment
- Will not increase the frequency or severity of existing NAAQS violations





General Conformity Analysis

BLM must perform a General Conformity determination for any size activity BLM authorizes UNLESS:

- WDEQ issues a federally enforceable permit under the New Source Review provisions of the Clean Air Act for the source of emissions.
- Has been shown to be de minimis for NO_x or VOCs (less than 100 tons/year for this non-attainment area)
- Is included on an approved 'Presumed to Conform' list
- Is explicitly excluded in an EPA or state regulation
- A GC determination has been completed along with a project specific NEPA analysis.
 - The determination will determine what requirements are necessary and will be spelled out in the Record of Decision



Processing Federal Actions

General Conformity is determined for the **ACTION** that will be authorized for a specific year, *regardless of size* (APD/multi-well pad/single grazing permit)

- Every proposed project must include an emissions inventory for NOx and VOCs
- Inventories are reviewed and approved by BLM-WY Air Resource Specialists
- Field office then authorizes project once determination of General Conformity is made

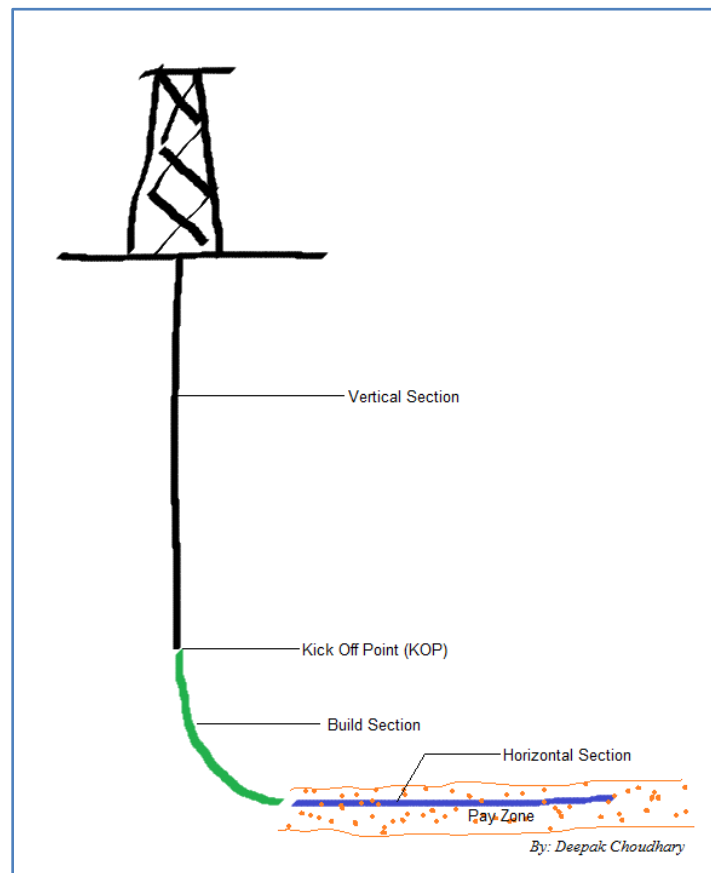
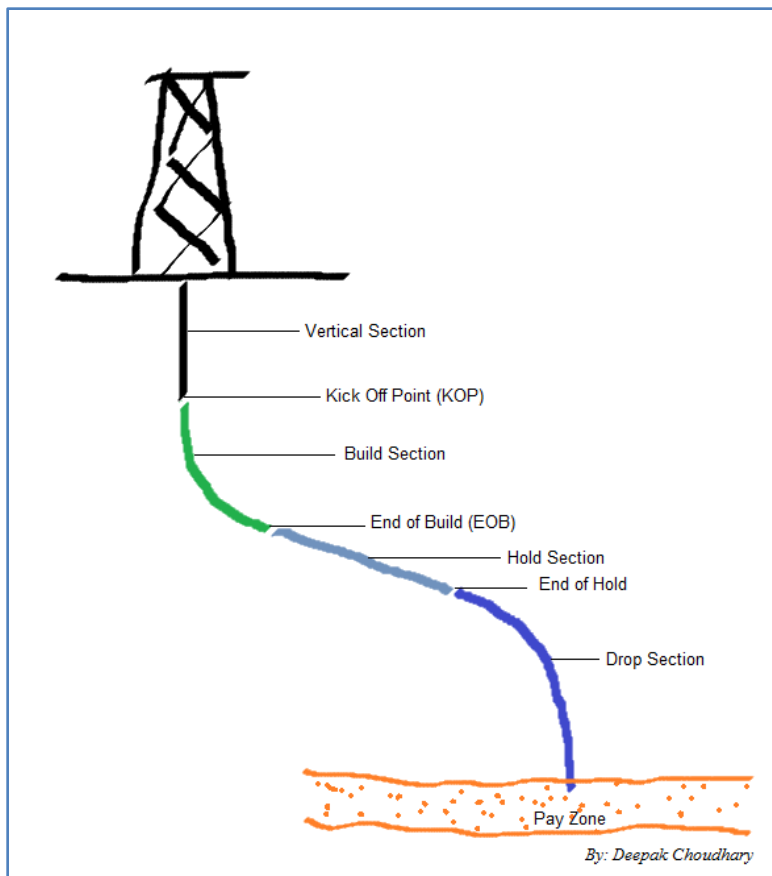


General Conformity In-Attainment

- If area is re-designated In-Attainment, BLM still has to comply with General Conformity regulations as long as the area is in 'Maintenance' (typically 10 years)
- If EPA revokes the 2008 standard, BLM may not have to comply with General Conformity regulations (currently under review by EPA)



Vertical/Directional to Horizontal Wells



- New/ revised emissions inventories
- New General Conformity review



Presumed to Conform List - Status

BLM-WY leadership has decided not to pursue the Presumed to Conform list (4-8-2021). A General Conformity determination is still required for all projects in the “marginal” attainment area.



Questions?



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