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Date: September 27, 2012

Mr. Thomas Coverdale  
Chairman  
Wyoming Environmental Quality Council  
122 W. 25th Street  
Herschler Building, Room 1714  
Cheyenne, WY 82002

**FILED**

**Sep 28, 2012**

**Jim Ruby, Executive Secretary  
Environmental Quality Council**

Dear Mr. Coverdale,

I wish to express my support for recently proposed changes to the Nonattainment Area Regulations located in Chapter 8 of the Wyoming Air Quality Division Standards and Regulations. The Environmental Quality Council will consider these changes at its October 5, 2012, meeting.

The changes under consideration will streamline the planning process required under the National Environmental Policy Act by aligning the State's nonattainment area regulations with recent changes adopted by the Environmental Protection Agency. In particular, there is a proposed change that would exempt newly designated nonattainment areas from conformity analysis requirements for a period of one year after the nonattainment designation date. This will be important for projects that are in advanced planning stages at the time an area is designated as being in nonattainment. Many projects, within a year of a decision determination, have already been through a thorough analysis process and could be significantly delayed by a conformity analysis requirement.

The Upper Green River Basin, which is an active area for energy development, has been recently designated as a nonattainment area for ozone. There is a proposed change that would exempt minor sources in this area that are already subject to the state's New Source Review program from having to be considered a second time in a conformity analysis. Many oil and gas emissions sources are classified as minor sources and thus could be subject to redundant analyses under the current regulations.

These changes will eliminate redundancy and increase efficiency while ensuring that air quality is protected. I believe they will improve the planning and approval process for energy development projects. Thank you for the opportunity to comment on these important revisions.

Sincerely,

/s/ Harv Forsgren  
HARV FORSGREN  
Regional Forester



cc: Terry Svalberg  
Jeff A Sorkin  
Marlene Finley  
Debra C Miller