

Linda Cooper
President and Spokesperson
SDSBT
P.O. Box 121
Bondurant, Wyoming 82922
www.sdsbt.org
sdsbt@wyoming.com
307-859-8455

FILED

AUG 17 2009

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

August 13, 2009

Environmental Quality Council, Docket #09-1101
122 W. 25th Street, Herschler Bldg., Rm 1714
Cheyenne, Wyoming 82002

SDSBT supports appropriate and necessary improvements in air quality especially in Sublette County. Repeated ozone exceedences well beyond national standards in recent years suggest that both the state and the nation need to improve its standard setting to protect public health.

Ozone, a known public health threat, in Sublette County is formed when the air chemistry surrounding oil and gas fields combines with certain winter weather conditions. That is not disputed, and the governor has already requested that EPA designate the entire Sublette County as a non-attainment area. The petition filed by Pinedale area citizens has our support.

To keep the pollution in check, making the ozone standards more stringent would be an important step. As the EQC considers new standard setting, please be reminded that there are real people whose health is put at risk when ozone standards are inadequate to meet the local conditions. This is not about a "number" or about the "fossil fuel industry" rather it is about protecting the public health of the citizens of Wyoming from the unintended consequences of intensive energy development under the conditions that present during the winter.

States can make these standards more stringent than the now already acknowledged ineffectual national standard of 75 parts per billion (ppb) associated originally with "tail- pipe pollution" in the summer months in urban areas. The Wyoming situation is quite different and requires a thoughtful and serious standard to meet the conditions on the ground here.

The EQC is encouraged to assure the public health and safety of Sublette County and surrounding areas by improving the standard.

We are aware that the Pinedale petition seeks a standard of 65ppb, the same as the Canadian standard within which the exploitation of oil and gas operates profitably. We would support an even more stringent standard, if the EQC were to determine that 65ppb was inadequate, especially in light of the intensive development, 4000 new wells slated for the Pinedale Anticline, and the possibility of another 1000 wells in the proposed infill for the La Barge platform.

Thank you in advance for taking our point of view into account.


Linda J. Cooper

Cc Governor Freudenthal

SDSBT is a not-for-profit Wyoming based citizens organization dedicated to stopping the spread of drilling further into undeveloped areas in the upper- Bridger-Teton National Forest.