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17 August 2009

Environmental Quality Council, 122 W. 25th St.
Herschler Bldg., Rm 1714
Cheyenne, WY. 82002

RE: Docket #09-1101

Dear Members of the EQC,

This letter is to urge you to look favorably on the petition for Ozone standard change currently before you. Below I offer my thoughts on this matter, which I hope you will take into consideration.

The Opportunity To Reduce Our Overall Pollution Problem

As you folks know, we folks here in Sublette County have an air pollution problem. DEQ-AQ reports that our air contains appreciable amounts of things like Formaldehyde, Acetaldehyde, Acrolein, Acetone, Propionaldehyde, Crotonaldehyde, Butyraldehyde, Benzaldehyde, Isovaleraldehyde, Valeraldehyde, and more (<http://deq.state.wy.us/aqd/Monitoring%20Data.asp>) .

What is wanted, of course, is less air pollution -- less acrolein, less formaldehyde etc. Which presumably will be achieved by your permitting less engine emissions, less fugitive and blowdown emissions, etc. etc.

To my thinking it is a fortunate coincidence that engine emissions and our vented natural gas stream contain precursors to one of the few pollutants covered by NAAQS standards. The coincidence is lucky because it leaves us with the opportunity to make strides towards cutting air pollution of many nasty kinds.

I understand that you have been presented with something like three cartons-full of scientific studies referenced by CASAC in support of their recommendation to EPA to set an ambient ozone standard between 60 and 70 ppb. Even without your plowing thru all that, it would seem entirely reasonable for Wyoming to set a 65 ppb standard based on the CASAC's recommendation. (In fact, a decision to ignore the scientific committee's recommendation seems unlikely to pass the red-face test.) And in setting a / the ozone WAAQS at 65, you will effectively be putting the lid on the trash can of many air pollutants.

In sum, to best motivate rapid progress back toward the air quality we had only ten years ago, a lower WAAQS standard is necessary. Please take the opportunity presented by this petition to set the ozone standard at 65.

Where Better to Set the Standard Than Sublette County ?

As we have been hearing from government and companies alike for some years now, the gasfields of Sublette County are a 'world class resource'. This is reflected, among other ways, by the fast rate of well payout. Several years back, I understand that the cost of drilling a well was paid off within the first three months of that well's production, a nearly unheard of speed. While the speed of payout depends on cost/income ratio, and gas prices are now lower, the ratio of drilling cost to mmmcf production remains the same. Thus, the gasfields of Sublette County remain and will continue to be among the top fields in the nation in terms of profitability.

It is commonly recognized that oil and gas fields, today and in the future, can be developed with far less pollution and still return profits. Initial stages of technology change, however, involve experimentation and learning, which translate to costs, which are always resisted. Still, if industry and society are to evolve, "Where better to set the standard (*for best drilling waste management, best fracking technology, best air pollution reduction methods, best environmental management practices*) than here ?? " -- where the federal mineral resources are 'world class' and thus able to shoulder part of the burden.

In conclusion, I believe that setting a 65 ppb WAAQS for Sublette County is 1) legally viable, 2) scientifically supported, and 3) economically appropriate.

Thank you for this opportunity to comment.

Respectfully,

Carmel Kail

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