

Oil & Gas Overarching Issues Public Comments

Name	Date	Message	Document Item
Warren J. McNall	7/3/2007	<p>The Four Corners Air Quality Task Force (4CAQTF) is a noble way of beginning communication between our citizenry and the polluting industries. Hopefully some meaningful "common ground" can be reached that will produce measurable air quality improvements.</p> <p>With a demonstrated failure of industry to "want to do their best" and when the "dollar gain" in a corporation's quarterly report is the measuring stick for it's shareholders, the recommendations from the 4CAQTF is up against a mature lobby force very capable of stopping meaningful actions that will lead to measurable benefits to our air quality!</p> <p>Therefore, spending serious time deliberating measurable benefits that could predictably occur if industry's suggestion of "year round" drilling EVERYWHERE as a means of ameliorating their emissions to me, seems without merit. A simple catalytic converter on each of their established fossil fuel operated engines would be considered a "wonderful start" of industry wanting "to do their best".</p> <p>Recommending to any state or federal land wildlife management agency to consider removing established seasonal habitat protection bans for the assumed benefit of distributing annual air quality pollutants should not be an option. Many years were spent by land management and wildlife management agencies formulating the habitats that need protection for identified species. The process to establish habitat closures is elaborate.</p> <p>Let us let this industry recommendation respectfully die and encourage installation of catalytic converters on industry's fossil fuel motors. This action does have measurable air quality results. As we drivers know, we are required by law to have catalytic converters on our vehicles as a way of demonstrating our contribution to improving air quality problems.</p> <p>As a recommendation, I would only suggest that if the oil and gas industry wants to recommend the lifting of this seasonal closure on identified lands, that THEY contact the state and federal agencies that have programming prerogatives over habitat and wildlife issues with their suggestion that lifting this ban would have beneficial measurable benefits for air quality concerns that outweigh wildlife concerns. The 4CAQTF should not be the "quarter back" for carrying the recommendation to state and federal habitat and wildlife agencies.</p> <p>I make these comments as a degreed wildlife biologist with 27 years of experience. Respectfully, Warren J. McNall 900 Sabena, Aztec, NM</p>	2 - Mitigation Option: Lease and Permit Incentives for Improving Air Quality on Public Lands
Southern Ute Growth Fund	7/11/2007	Disagree - unlike Wyoming, Colorado has a shortage of state and federal specialists to monitor impacts from oil and gas development. As a result, monitoring of oil and gas impacts to wildlife would likely not happen. Streamlining the permit process would be beneficial to operators economically, but may be at the expense of area wildlife and habitat.	2 - Mitigation Option: Lease and Permit Incentives for Improving Air Quality on Public Lands

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Erich Fowler	7/12/2007	<p>Regarding the paragraph:</p> <p>"Monitoring has also not been a model experience in this area. According to reports of a May, 2006, internal assessment Pinedale, Wyoming, Bureau of Land Management field office, the office neglected its commitment to monitor and limit harm to wildlife and air quality from natural gas drilling in western Wyoming. A wildlife biologist who worked in that Pinedale office, Steve Belinda, is reported to have quit his job because he and other wildlife specialists were required to spend nearly all their time in the office processing drilling requests and were not able to go into the field to monitor the effect of the thousands of wells on wildlife."</p> <p>Basically, I would suggest a more neutral approach than the quoted paragraph. It is rather forceful, without sufficient follow-up. It would help our situation if we could see whether the Farmington office is under similar pressures. Alternatively, examining the policies, rather than experiences, might make for a stronger position. For example, as the author seems to know a bit about BLM and permitting--she/he might instead look into the use of categorical exclusions (CAX) which are currently used to circumvent the environmental assessments (EA) that would normally be required to develop well fields on BLM land. (Sometimes this is also called streamlining.) How prevalent is this practice in the Four Corners, do CAX result in a lower standard of environmental review, and could this practice deleteriously impact 4C air quality?</p>	2 - Mitigation Option: Lease and Permit Incentives for Improving Air Quality on Public Lands
Renee Lewis	7/12/2007	In light of the current global climate conditions, lessening our overall impact on the environment is everyone's duty to the planet and its children's future. This task force should not be in the position of negotiating away wildlife habitat in exchange for mitigating measures that ought to be a duty of the oil and gas industry as a cost of doing business on this planet.	2 - Mitigation Option: Lease and Permit Incentives for Improving Air Quality on Public Lands
Southern Ute Growth Fund	7/11/2007	Mitigation option is both economically feasible and environmentally beneficial, as a result we strongly agree with their implementation.	3 - Mitigation Option: Economic-Incentives Based Emission Trading System (EBETS)

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Rebecca Oertel	7/13/2007	<p>Economic-incentives based emission trading systems (EBETS) have had varying levels of success nationally and have been less successful in geographic regions where pollutants are already causing harm to human health or the environment. It can also be argued that these systems lack incentives to improve environmental quality over economics. They can be more a function of market supply and demand driving the trades, not variations in regional human and environmental health "costs".</p> <p>Multisectoral trading systems are complex, increase challenges in emissions monitoring, and environmental justice considerations become more complicated due to inequitable concentrations of source emissions and different pollutant mixing outcomes. (Regarding the federal Acid Rain Program, indeed, the nationwide level of emissions from electric utilities were halved since 1980, however, no geographic restrictions were imposed and many areas of higher pollution levels remained at higher levels.) As stated in the Task Force document, the major burden for the EBETS mitigation option would be administrative; however the full burden must be assessed and coordinated among the state agencies. Not only would comparability and tracking of different types, sizes and ages of installations be extremely complicated, multi-pollutant emissions trading is challenging to monitor and enforce.</p> <p>Although it would be impossible to have an emissions trading system that eliminates environmental injustice, a carefully designed trading system that is rigorous, far-sighted, and includes geographic restrictions would have a much better chance of reducing localized injustices to human health and/or the environment.</p>	3 - Mitigation Option: Economic-Incentives Based Emission Trading System (EBETS)
Jan Rees	6/29/2007	The proposed incentive to modify standard stipulations for federal land if it is to be the relaxing or waiving of seasonal restrictions for wildlife while promoting year round drilling should not be a part of the voluntary program. Seasonal restrictions have been written to benefit wildlife during times of the year when they are at increased risk due to weather, nesting, birthing, etc. The Wyoming experience has shown the potential negative impacts of intense drilling on wildlife, and how highly wildlife is valued by a broad range of American people. With the pressures from the increase in drilling, wells, roads, and pipelines in the Four Corners area, we can ill afford to lose the wildlife protections from the stipulations that we currently have.	6 - Mitigation Option: Voluntary Programs
Dennis Casto	6/30/2007	New Mexico and Colorado already have rules governing H2S, no need to add more rules that may conflict.	8 - Mitigation Option: Mitigation of Hydrogen Sulfide
Shirley J. McNall	7/3/2007	New Mexico Environment Department does have controls for H2S on paper, but state environmental officials have validated that the state does not have H2S monitoring equipment.	8 - Mitigation Option: Mitigation of Hydrogen Sulfide
Southern Ute Growth Fund	7/11/2007	Mitigation option is both economically feasible and environmentally beneficial, as a result we strongly agree with their implementation.	8 - Mitigation Option: Mitigation of Hydrogen Sulfide
Renee Lewis	7/12/2007	Rules that are capable of being enforced due to adequate staffing and necessary monitoring tools are what is needed to regulate this area. More rules that cloud the issue, or are effectively toothless due to lack of enforcement infrastructure will not accomplish the goals of this task force.	8 - Mitigation Option: Mitigation of Hydrogen Sulfide