

Mr.

Please see the attached file, which are the Cheyenne Area Landowner's Coalition's comments on the 2019 Wyoming Ambient Air Monitoring Annual Network Plan. Contact Alex Bowler with any questions. [nabowler@aol.com](mailto:nabowler@aol.com)



June 12, 2019

Cara Keslar  
Monitoring Section Supervisor  
Wyoming Department of Environmental Quality-Air Quality Division  
200 West 17th St.  
Cheyenne, WY 82002  
[Cara.keslar@wyo.gov](mailto:Cara.keslar@wyo.gov)

Re: Wyoming Ambient Air Monitoring Annual Network Plan 2019

Dear Supervisor Keslar,

Thank you for accepting our letter pertaining to air monitoring in Laramie County. We submit this letter on behalf of the Cheyenne Area Landowners Coalition (CALC) whose members live in Cheyenne and Laramie County. We would also like to thank the Wyoming Department of Environmental Quality and the Air Quality Division for their placement of a Mobile Air Quality Monitoring Unit in Laramie County where there is increasing oil and gas operations near neighborhoods, homes, and productive rangeland.

### **Location of Mobile Air Quality Monitoring Unit**

For several years, we have been concerned about the air quality in Laramie County because of increasing industrial development. Our organization hears concerns from our members regarding poor air quality specifically: respiratory issues, smoke alarms sounding in the night, and other gastrointestinal and neurological health issues. Several of our members attended the Mobile Air Quality Unit Open House on November 4th, 2019 to better understand the air quality monitoring process in our county. When we arrived at the location, we were disappointed to see the monitoring station had a location not in close proximity to oil and gas operations. When asking the technician at the open house, he specified that the closest oil and gas pad was about four miles away. Recently we investigated ourselves, and we were able to find a well pad about two miles west of the monitoring station. Additionally, we noted how dispersed oil and gas wells were in the area of the monitoring station; whereas, in other places in the county, oil and gas wells are much more congested and closer to homes. We do not believe that this current location of the monitoring will provide realistic data on the poor air quality that many of our members and other landowners face living within less than a mile of several oil and gas operations in Laramie County.

We understand that this monitoring station is designed to capture ambient air quality conditions - not point source emissions from any one particular wellpad; however, its specific purpose as funded is also to determine how those ambient air quality conditions are being impacted by oil and gas development. If the monitor is placed too far away from oil and gas well pads and infrastructure, it will not be able to serve its purpose.

**DEQ should revisit Mobile Unit Air Quality Monitoring in Laramie County**

We believe that if the Wyoming Oil and Gas Conservation Commission (WOGCC) continues to permit oil and gas operations within 500 feet of residents, then our state's air quality monitoring should reflect similar distances and impact levels from all wells and infrastructure in close proximity to homes and businesses. This will allow us to better understand the impact nearby oil and gas development has on public health. We understand that the current mobile monitoring unit will remain in its location until October of 2019. We request DEQ to keep the mobile monitoring unit in Laramie County, but consider locations closer to oil and gas infrastructure for monitoring as part of this year's monitoring plan and in future years. Oil and gas development will only increase in Laramie County over time and DEQ needs to establish a comprehensive monitoring plan - now - before ambient air quality conditions deteriorate too much. Otherwise, DEQ will not be able to have a "baseline" to compare to in determining whether and to what extent oil and gas development is having an impact in Laramie County. We suggest the following areas which are impacted by poor air quality for additional monitoring: around the the Archer Complex, County Road 203, County Road 138 and areas west of 140 and east of Cheyenne city limits where there is greater number of homes, oil and gas wells, and new drilling to begin in the next year.

As DEQ learned with the Pinedale Anticline development, air quality conditions near oil and gas operations can deteriorate rapidly when development takes off. Now is the time to collect the necessary baseline data, ensure ambient standards are being met, and establish a monitoring program that will accurately determine whether those ambient standards are met into the future. The health and safety of Laramie County residents depends on it.

Thank you for your time and consideration of our request,

Sincerely,

Alex Bowler  
President, Cheyenne Area Landowners Coalition

Cc: Nancy Vehr  
Administrator, Division of Air Quality  
Department of Environmental Quality  
200 West 17th St.  
Cheyenne, WY 82002  
Fax (307) 635-1784