



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

John Corra, Director

December 21, 2011

Minor Source Oil & Gas Production and Midstream Operators in Wyoming

RE: 2011 Triennial MINOR Source State Wide Inventory

In accordance with 40 CFR Part 51, Subpart A, states are required to report total state-wide emissions to the United States Environmental Protection Agency (EPA) every three years. Calendar year 2011 marks the third year in the reporting period for which emission inventories are required to be collected by each state and submitted to EPA for the National Emissions Inventory (NEI). As such, the Wyoming Department of Environmental Quality (DEQ), Air Quality Division (AQD) is requiring each minor source located in the state of Wyoming to complete an air emissions inventory for emissions that occurred during calendar year 2011 only. **The completed 2011 Triennial Minor Source inventory shall be returned to the AQD no later than April 30, 2012.** This emission inventory information is required to be submitted to the AQD, pursuant to W.S. 35-11-110(a)(vii).

The AQD needs actual emissions information for a number of purposes. This data is used to model air quality impacts and will be used to help the AQD understand and take proactive measures to try to prevent potential future air quality problems. Actual emissions data is used in many systems, including being made publically available. This information is combined with other emission inventories including, but not limited to, those from major sources, transportation (both on-road and non-road mobile emissions) and fires to form a complete picture of how emissions from all sources affect Wyoming's air quality.

This is only the second statewide call for emissions inventory data from all minor sources. In prior reports made to EPA (before 2008), the AQD based its reporting on a review of information found in permit and compliance files. As such, the AQD may have included emissions from sources that were never constructed, or which were constructed and subsequently ceased operations. Given the growing importance to the State of Wyoming for having good, representative information about actual emissions from all sources in Wyoming, the AQD believes it is important to require all permittees to report on sources that are actually in operation.

The AQD understands the burden government reporting requirements impose on owners of permitted facilities, and has attempted to make this reporting as simple as possible. For oil and gas production and midstream facilities, the AQD is requiring certain information be supplied that describes the actual equipment in use at each facility. Emissions from oil and gas production facilities can be calculated using production data currently reported to the Wyoming Oil and Gas Conservation Commission, if the AQD has information on equipment in use at each facility. While it may require extra effort for companies to survey their oil and gas production and midstream operations to collect information necessary to meet the emission inventory reporting requirement specified in this letter, it can significantly reduce the need for the AQD to request emissions inventory information from sources in these categories in the future.

Depending on the type and location of each production site and midstream facility, the information will need to be reported in one of several different excel workbooks. First, there is a single workbook to be completed for the midstream facilities (**natural gas compressor stations, gas plants, liquids gathering**

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ADMIN/OUTREACH (307) 777-7758 FAX 777-7682	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-6937	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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systems, gas transmission lines, bulk crude breakout stations, or other similar facilities). A single inventory workbook is required to be submitted for each facility. As an example, if a company operates a compressor station in Lincoln County, a second compressor station in Sublette County, and a gas plant in Uinta County, then three separate inventory workbooks must be submitted. Second, there are multiple workbooks to be completed for **oil & gas production sites** (both CBM and non-CBM gas wells, and oil wells) **and tank batteries.** All workbooks can be downloaded from AQD's website at the following location: <http://deq.state.wy.us/aqd/ei.asp>. Detailed instructions for completing the inventories are provided in the first sheet for each excel workbook.

It is necessary that permittees who are providing emission inventory information for their sources download the appropriate excel spreadsheet forms. These forms then need be renamed to distinguish one inventory from the next, and to allow permittees to save them on their local computer and work on adding information to them until they are complete. When complete, the forms are required to be uploaded to the AQD's web server at the following location: <https://deq.state.wy.us/AQDFileUploads/LoginUser.aspx>. A user name and password is required to be entered prior to uploading the inventories to the web server. Please note that the username and password are case sensitive. There are different user names depending on the type of industry for the submitted. For the non-oil & gas industry, the User Name is **OilandGas** and the Password is **Inventory4 (that is the number 1, followed by nventory, followed by the number 4)**. If you are having trouble uploading the inventories, please contact Mr. Scott Faber, Natural Resources Program Principal, at 307-777-3366 or by e-mail at scott.faber@wyo.gov.

Should you have any questions or comments concerning this request, please contact Mr. Faber (see contact information above); Mr. Brian Bohlmann, Emissions Inventory and Regional Haze Supervisor, at 307-777-6993 or by e-mail at brian.bohlmann@wyo.gov; Mr. Leif Paulson, Natural Resources Analyst at 307-777-6126 or by e-mail at leif.paulson@wyo.gov, or Mr. Brian Hall; Natural Resources Program Principal, at 307-777-7017 or by e-mail at brian.hall@wyo.gov.

If the company contact listed on the envelope is incorrect, please provide the corrected information to the AQD on the inventory form when submitted. Additionally, if your company received this letter and does not have any operations in Wyoming, please let the AQD know.

Sincerely,



Steven A. Dietrich
Administrator
Air Quality Division

SAD/brb

cc: Darla Potter, AQRM Program Manager
Emissions Inventory Staff
District Engineers, Districts 1-5