



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

Todd Parfitt, Director

April 27, 2015

Dear Participants of the 2015 Ozone Contingency Plan (OCP) program,

The State of Wyoming would like to thank you all for making the 2015 Ozone Contingency Plan (OCP) program a success. Even though there were no Ozone Action Days (OADs) issued this season, this program was a continued success due to the support and immense effort put forth by you. Thirty-four (34) total Annual Ozone Contingency Plans were submitted; three (3) of those were from governmental agencies/entities, and thirty-one (31) were from oil and gas companies, service companies, and non-oil and gas companies.

The following summarizes the 31 Annual Ozone Contingency Plans submitted by oil and gas companies, service companies, and non-oil and gas companies.

- 27 companies committed to minimalizing vehicle traffic and miles traveled.
- 24 companies committed to minimizing the traveling and idling of vehicles, not overfilling gas tanks, tightening fuel caps, traveling 5 mph below the speed limit, and keeping vehicles properly tuned.
- 24 companies committed to deferring truck and equipment refueling to evening hours on OADs.
- 23 companies utilized various forms of leak detection in preparation for or during the 2015 winter season (Jan. 2 – Mar. 31).
- 21 companies committed to postpone construction and maintenance activities associated with all aspects of energy recovery and production on OADs.
- 20 companies committed to postponing blowdown actions affiliated with energy recovery and production on OADs.
- 18 companies committed to postponing maintenance activities associated with all aspects of energy recovery and production on OADs.
- 13 companies committed to postponing the initiation of new completion actions on OADs, and 6 committed to postponing the initiation of new completion actions for the entire winter season.

Each OCP participant operates differently. As a result, general comment sections were provided to list emissions reducing efforts not specifically captured by the OCP action lists. Several actions were identified that were employed on a year-round basis, during winter months, or that may be employed in the future. Below is a short compilation of those actions:

- Year-round emissions reducing activities included:
 - Limiting idling and traveling time and carpooling whenever possible.
 - Tightening vehicle gas caps and maintaining inflated tires on vehicles to increase mileage and reduce refueling.
 - Postponing truck hauls whenever tanks are at or below overfill levels to prevent spilling.
 - Utilizing infrared cameras to survey equipment, detect leaks, and determine when repairs are needed.

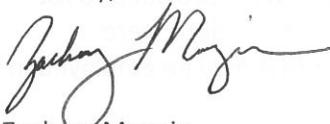


- Engaging in quarterly leak detection and repair (LDAR) monitoring.
 - Replacing pneumatic chemical injection pumps with solar-powered units.
 - Using plunger lifts to reduce blowdowns and venting.
 - Performing flare-less completions over 99% of the time.
 - Employing selective catalytic reduction (SCR) controls on all rig engines.
 - Using tanks with internal floating roof controls.
 - Converting of central gathering and salt water disposal facilities to electricity.
- Winter emissions reducing activities included:
 - Limiting construction activities.
 - Shutting in some gas/condensate producing wells during this period.
 - Postponing completions for the month of January.
 - Busing crews to drill rigs and hydraulic fracturing operations.
 - Refueling equipment and trucks during nighttime hours.
 - Using solar chemical pumps for methanol injections.
 - Utilizing methanol injection as the first attempt at breaking line freezes and moving hydrates through gathering lines.

 - Future emissions reducing plans included:
 - Upgrading equipment when replacement is necessary.
 - Modifying emission controls for wells on pads established under previous air quality standards.
 - Participating in programs to reduce sizing of pneumatic pumps and reboiler burners.
 - Replacing natural gas powered pumps with solar pumps, specifically those for methanol injection.
 - Purchasing vehicles that run on cleaner-burning, compressed natural gas (CNG) fuel.
 - Implementing a potential central dehydration project.
 - Moving towards electrification of more facilities in the field as infrastructure allows.

The State of Wyoming would like to thank you again for all your hard work in reducing ozone precursor emissions. We look forward to working with each of you to make the 2016 OCP program a success as well as continuing expansion of the OCP program to all stakeholders.

Sincerely,



Zachary Mangin