

APPENDIX E

CONFORMITY ANALYSIS

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SUBJECT: General Conformity Analysis for the Thurston 2-Well Development Program

LOCATION: Uintah County, Township 7 South, Range 21 East, Section 31

FIELD OFFICE: Lower Green River NWR Complex

BACKGROUND: Thurston Energy proposes to drill two wells on Ouray NWR.

PREPARED By: Rob Bundy, Project Leader, Lower Green River NWR Complex

1. The U.S. Fish and Wildlife Service (Service), as the federal agency with jurisdiction for the subject activity, is bound by the requirements of the General Conformity Rule under Section 176(c) of the Clean Air Act and Utah Administrative Code R307- 115 for authorizing activities within the EPA designated Uinta Basin Ozone Nonattainment Area.
2. The subject activities will be located within the Uinta Basin Ozone Nonattainment Area (Marginal) and thus a General Conformity demonstration or non-applicability analysis is required before the Service can authorize the activity.
3. The Service has provided a narrative covering direct and indirect emissions rates should the wells be approved, and included this in section 4.1.2 of the Final SEA. The narrative includes specific information about emissions emitted during different stages of development (e.g., construction, drilling, well completion), and what emission controls or offsets may be utilized, such that a reasonably precise emission estimate could be provided and compared to de minimus thresholds in 40 CFR 93.153. Some project components may be permitted under Utah Administrative Code R307 504-511 and are not subject to General Conformity analysis provisions.

REFERENCES:

1.40 CFR 93.153 defines the *de minimis* thresholds for NO_x and VOC in a marginal ozone nonattainment area as 100 tons per year (tpy).

2.Utah Administrative Code R307 504-511 permits by rule tank truck loading, storage vessels, dehydrators, VOC control devices, well site natural gas-fired engines, and gas flaring. These emissions sources as described in the code are not subject to General Conformity review.

CONCLUSION: This proposed Thurston 2-Well Development Program, has been evaluated in accordance with the requirements of 40 CFR 93.153 subpart B and Utah Administrative Code R307-115 and has been determined to conform with all applicable local, state, and federal air quality laws, regulations, and statutes for the following reason(s):

- Action is covered within the approved SIP
- Action is excluded by the Regulatory Authority per:

Action is categorically excluded per (citation):

Potential maximum total direct and indirect emissions are below *de minimis* threshold levels (Final SEA Table 4-6):

Ozone (NO_x emissions): **6.06 tpy**

Ozone (VOC emissions): **12.07 tpy**

Potential total emissions are fully offset by:

Other (specify):

Authorized Officer