

Thank you for your comment, Jim DiLeo.

The comment tracking number that has been assigned to your comment is OSTS2012D50072.

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OSTS 2012 Draft PEIS

Comment ID: OSTS2012D50072

First Name: Jim

Middle Initial:

Last Name: DiLeo

Organization: Colorado Department of Health/Environment - Air Qu

Address: 4300 Cherry Creek Drive South

Address 2: APCD-ADM-B1

Address 3:

City: Denver

State: CO

Zip: 80246

Country: USA

Privacy Preference: Don't withhold name or address from public record

Attachment: OG 4-5-12 Team Comments on Oil Shale PEIS.docx

Comment Submitted:

## **Comments on Draft Programmatic Environmental Impact Statement (PEIS) and Possible Land Use Plan Amendments for Allocation of Oil Shale and Tar Sands Resources on Lands Administered by the Bureau of Land Management in Colorado, Utah and Wyoming**

General: There are very few conclusions reached in the PEIS and minimal technical data because of the speculative nature of this document. There are multiple references throughout the document to the effect that it is not possible to predict specific air quality impacts until actual oil shale projects are proposed and designed. Once a project is proposed, prior to a lease being approved a site-specific NEPA analysis must be submitted and approved. At this point, the Division's technical expertise will be best used.

Specific Comments:

**Chapter 3.5.2 Existing Emissions, lines 39-41 of page 3-105** states that, "...annual emission inventory data for criteria pollutants and volatile organic compounds (VOC) for 2002 for counties within and around the study are in Colorado..."

Comment: There has been significant oil and gas expansion in the Piceance region, where the Oil Shale exploration will take place, since 2002. As a result the emission inventory is outdated. A more recent data set should be obtained and used.

**Chapter 4.1.3 In Situ Retort Projects, lines 12-14 of page 4-12** states that, "100% of combustible gases recovered from the formation would be dewatered, filtered of suspended solids, and consumed on site as supplemental fuel in external combustion sources."

Comment: During an APCD inspection of the Shell Mahogany project, gases recovered from the formation were flared, not used as supplemental fuel. Suggested revision is to include possibility of flaring gases.

**Chapter 4.6.1 Common Impacts, lines 20-21 of page 4-53** states that, "Before oil shale development could occur, additional project-specific NEPA analyses would be performed, subject to public and agency review and comment."

Comment: Given the limited information provided in the PEIS, it's at this site- and project-specific level that the technical expertise of the O&G Team can be best used.

**Chapter 6.1.1.5 Air Quality (of Alternative 1), line 26 of page 6-11**

**Chapter 6.1.2.5 Air Quality (of Alternative 2), line 1 of page 6-73**

**Chapter 6.1.4.5 Air Quality (of Alternative 4), line 21 of page 6-176** all chapters state that, "If development of oil shale requires expansion of capacity of existing electric power plants..."

Comment: It is believed that the development of shale *will* require additional power capacity. Suggested revision is to strengthen this language to reflect that commercial development will more than likely require additional power capacity.

**Chapter 6.1.5.5 Air Quality, lines 30-35 of page 6-229** states that, "...impacts would be considered in project-specific NEPA analyses that would be conducted at the lease (including conversion from any RD&D to a commercial lease) and development phases of projects."

Comment: It is unclear if BLM expects companies to halt production and expansion of a project from the RD&D phase to the commercial production phase or if this analysis will take place while a facility is expanding. Suggested revision: please clarify what is expected of a company and when the public and agencies have an opportunity to analyze additional impacts.