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First name: Robert

Last name: Ukeiley

Organization:

Title:

Comments: I own land in Township 31, Range 49. My land borders the Comanche. I also like to explore other parts of the Comanche.

The EIS needs to evaluate whether the oil and gas development and operation activities will cause air pollution levels that exceed the national ambient air quality standards for nitrogen oxides (NOx), sulfur dioxide (SO₂), ozone, particulate matter less than 10 microns and particulate matter less than 2.5 microns (PM₁₀/PM_{2.5}). You should use air modeling performed pursuant to 40 CFR Part 51, Appendix W to do this analysis. However, since appendix W does not clearly address ozone or secondary PM_{2.5} just yet, you should use a photochemical grid model like CAMx to perform this analysis. In the ozone analysis, it is very important to correctly quantify ammonia from cattle operations, especially CAFOs and stockyards. The same goes for chicken and hog operations.

It does not matter whether these areas are currently designated attainment. That just says what the air quality is before the project and in event, because the Clean Air Act designates areas attainment or unclassifiable if there is no monitoring data, the designation does not usually actual tell one anything about the actual air quality. In addition, you cannot get out of conducting this analysis by claiming that the activities will get permits from the state. Because these will more than likely be minor source permits, the state will not do an adequate analysis, if any, of whether there will be NAAQS violations. Also, the state will likely not consider mobile sources, such as drill rigs and trenching equipment. Even if it were allowable to ignore mobile sources under the Clean Air Act, it is clearly not allowable under NEPA. Finally, you must conduct an analysis of the increment consumed by these sources and the economic impact on consuming this increment and thus not allowing other economic activities to have this increment.