

From: Lew Dendy

Sent: Sunday, March 10, 2013 9:39 AM

To: Nugent, Angela

Cc: webcomments.oig@epa.gov

Subject: EPA Oil and Gas Emission Estimation Tool

Dear Ms. Nugent (EPA Science Advisory Board),

I found the Science Advisory Board's draft report "SAB Review of Emissions-Estimating Methodologies for Broiler Animal Feeding Operations and for Lagoons and Basins at Swine and Dairy Animal Feeding Operations" (12/3/12) quite interesting, especially since it identifies a problem familiar to me. In the EPA

Science report the SAB concluded that the EPA's emission estimating methodologies for animal feeding operations are based on limited data and cannot be extrapolated to farms across the country.

It appears EPA intends to apply the same, unscientific technique to estimate air emissions for non-point sources in oil and gas extraction operations. The oil and gas non-point emission estimation tool (O&G tool) EPA is developing is based on extremely limited data collected from only a few operators working in only a few of the oil and gas pools in the country. EPA intends to use the tool and the default values developed to estimate CY2011 non-point oil and gas emissions from across the country.

The characteristics of the oil and gas formations and operations across the country are quite varied and the impact of that variety on air emissions is significant. Although EPA will consider adjusting the O&G tool's default values if states submit credible alternate values that reflect the pools and operations in individual states, in a vast majority of the states that information simply does not exist. Yet EPA is moving forward, apparently of the opinion that even a significantly erroneous estimate is better than

none at all.

The air emission estimates produced by the O&G tool will be entered into the 2011 National Emission Inventory this year and will serve as the basis for EPA modeling to be conducted in the summer of 2013 and for subsequent national rule making. It appears the O&G tool is based on data too limited to make even remotely accurate estimations of national air estimations. In short, the EPA O&G tool appears to suffer from the same flaw as their feedlot estimation tool—a lack of a sound, scientific basis.

I offer the above information in the hope that the SAB will evaluate EPA's O&G tool as soon as possible to determine if it is sufficiently based on science so as to be able to produce emission estimates adequate for rule making. I thank you for your consideration of my request.

Sincerely,

Lew Dendy

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