

November 15, 2017

Sheila Vance, Division of Air Quality
PO Box 144820
Salt Lake City, UT 84114-4820
svance@utah.gov

RE: IMPROVEMENTS TO UTAH AIR QUALITY RULES, AMENDMENTS R307-150, AND R307-504 THROUGH R307-510

Dear Ms. Vance,

We the undersigned businesses would like to take this opportunity to offer comments on the Division of Air Quality's (DAQ) proposed amendments to the rules governing oil and gas development on Utah's public lands. Our state is known the world over for its unique landscapes and high quality recreation opportunities, an asset we all want to protect and grow.

As outdoor recreation businesses in Utah, we have significant interest in these proposed rule changes. First, we depend on consumers buying our products to use on public lands and/or booking trips to experience these lands through our services. The user experience is central to our businesses' success, and that experience can be greatly threatened by improperly managed development. Secondly, we, along with our employees, live, work, and play here in Utah. It is important to us to have clean air for recreation and for our quality of life. Unfortunately, Utah suffers from a reputation for poor air quality, which also makes it difficult to recruit and retain quality employees.

We commend the DAQ for taking the steps to address the ozone pollution from oil and gas development on our public lands. However, we also encourage you to implement the following additions to the draft rules:

Strengthen leak inspection requirements. We urge you to increase leak detection and repair provisions in the draft rules to require operators to conduct leak inspections at least twice a year at all production facilities. The current proposal exempts certain facilities from this important inspection requirement. Frequent inspection of facilities with modern leak detection equipment is a proven method to reduce leaks and maximize product recovery. Both Environmental Protection Agency and Bureau of Land Management rules require operators to inspect their facilities twice a year. Increasing Utah's minimum inspection frequency to semi-annual will harmonize federal and state rules and reduce jurisdictional confusion.

Broaden the rules to address all forms of hydrocarbon air pollution. We also urge the DAQ to strengthen the proposal by expanding the control requirements to apply to the full suite of hydrocarbon pollutants contained in natural gas emissions. As currently drafted, the rules will exclude the bulk of natural gas emissions, which consist of methane—both the main product of the natural gas industry and a powerful greenhouse gas that contributes to air pollution and climate change. Expanding the scope of the rules to apply to total hydrocarbons (Volatile Organic Compounds, or VOCs, and methane) will ensure maximum product recovery and will harmonize Utah's requirements with federal requirements and those of neighboring states.

Thank you again for this opportunity to comment, and for taking the steps necessary to secure healthy public lands and air quality for Utah's citizens and its future citizens.

Sincerely,

Nazz Kurth, **Petzl America**
Salt Lake City, UT

Ashley Korenblat, **Western Spirit Cycling**
Moab, UT

Dustin Buckthal, **The Front Climbing Club**
Salt Lake City, UT

Carl Dec, **Red River Adventures**
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Bruce Lavoie, **OARS**
Vernal, UT

Jacques Hadler, **Moab Cyclery**
Moab, UT

Kevin Boyle, **Kuhl**
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Herm Hoops, **Oneway Boatworks**
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Christina Sloan, **The Sloan Law Firm**
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Charlie Butler, **Wasatch Touring**
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