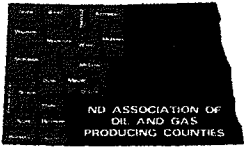


DEC 18 2015



ND ASSOCIATION OF OIL AND GAS PRODUCING COUNTIES

EHS Chief's Office

EXECUTIVE COMMITTEE

Daryl Dukart
President
Dunn County

**Supt.
Steve Holen**
Past President
McKenzie County PSD

Greg Boschee
Mountrail County

Dan Brosz
City of Bowman

Ken Callahan
City of Williston

**Supt.
Jason Kersten**
Bottineau PSD

Shawn Kessel
City of Dickinson

Doug Nordby
McKenzie County

John Phillips
Coal Conversion
Counties Board

**Supt.
Gary Witz**
Killdeer PSD

STAFF

Vicky Steiner
Executive Director
(701) 290-1339

Janet Sanford
Permit Operator
Treasurer

Attention: Dave Glatt, Chief of the Environmental Health Section, Department of Health

December 16, 2015

The North Dakota Association of Oil and Gas Producing Counties (NDAOGPC) opposes the proposed Clean Power Plan (CPP) of the United States Environmental Protection Agency (EPA).

The NDAOGPC has 141 oil, gas, and coal producing counties, cities and school districts in western North Dakota in its membership. Many of our member jurisdictions have citizens employed in these oil, gas and coal businesses. North Dakota is one of 7 states that currently meet all federal national ambient air quality standards.

North Dakota has always met air standards and we continue to improve. Our state must be allowed to work for the changes necessary in the future to meet goals. The proposed CPP is not flexible and it is an overreach of the EPA's given powers. The energy industry will work to meet goals as technology develops. To close plants because of the new rules is not realistic and it will cost consumers in the long run.

The State of North Dakota has thus far been successful in an injunction on actions by the federal government restricting the state's development of its fossil fuels. We support the state's action.

The EPA staff has shown itself to be charting a course of its own. Future investments in the Bakken Three Forks oil play with CO2 injection recovery need to be encouraged by the EPA, not discouraged.

We have confidence that give a reasonable amount of time, better environmental solutions will be found and we will be able to meet air quality standards in a longer time frame. All of us support improving environmental standards but this rush to a new, unachievable standard will be detrimental to the economic well-being of North Dakotans. This will likely increase costs to regional consumers yet have little impact on air quality in the world.

Sincerely,

Vicky Steiner-Executive Director, on behalf of the Executive Committee