

TECHNICAL REVIEWERS' RATING SUMMARY

G-021-A

WRAP Phase III Oil and Gas Air Emissions Inventory for the Williston Basin

Submitted by Independent Petroleum Association of Mountain States (IPAMS)

Request for \$25,000; Total Project Costs \$95,000

Rating Category	Weighting Factor	Technical Reviewer			Average Weighted Score
		21B-02	21B-03	21B-04	
Objective	9	4	5	4	39.0
Availability	9	5	5	2	36.0
Methodology	7	3	5	4	28.0
Contribution	7	4	5	4	30.3
Awareness	5	5	5	4	23.3
Background	5	5	5	4	23.3
Project Management	2	5	4	3	8.0
Equipment Purchase	2	5	5	5	10.0
Facilities	2	4	5	3	8.0
Budget	2	2	5	4	7.3
Average Weighted Score		212	248	180	213.3
Maximum Weighted Score					250

OVERALL RECOMMENDATION

FUND	X	X	X
FUNDING TO BE CONSIDERED			
DO NOT FUND			

Section B. Ratings and Comments:

- 1. The objectives or goals of the proposed project with respect to clarity and consistency with North Dakota Industrial Commission/Oil and Gas Research Council goals are: 1 – very unclear; 2 – unclear; 3 – clear; 4 – very clear; or 5 – exceptionally clear.**

Reviewer 21A-02 (Rating: 4)

No Comments

Reviewer 21A-03 (Rating: 5)

Clean Air regulations such as Regional Haze and several new ambient air quality Standards may significantly impact the oil and gas industry in the near future. An accurate emission inventory will be a critical tool necessary to ensure that air quality assessments may be completed accurately and that any reductions in emissions that may be necessary are targeted to the appropriate sources. Compliance with the standards will enable (rather than severely limit or even prohibit) future exploration and development to utilize North Dakota's oil and gas resources. Within this context, every one of the goals and objectives listed in the Mission Statement is related to this project (either directly or indirectly) in that the results of this inventory will allow the oil and gas industry to determine how development can best continue while maintaining clean air on behalf of the citizens of North Dakota.

Reviewer 21A-04 (Rating: 4)

The stated goal to develop an accurate, credible, and comprehensive, 2006 baseline and projected 2012 criteria pollutant emissions inventory for the purpose of evaluating control strategies, estimating impacts, and managing emissions within the Williston air quality basin was clearly stated. However, the technical approach and quality assurance provisions for obtaining these project goals was deficient and lacked specificity. The proposal provides insight into potential uses of the inventory data and projections such as Regional Haze planning, and an idealistic statement for determining compliance with the CAA however, no additional discussion is provided to caveat or limit the use of these data. For example, the recently promulgated 1-hour NO₂ NAAQS is likely to result in an expanded nonattainment area designation and require aggressive control strategies. Will the emission inventory attempt to apportion nitrogen oxides (NO/NO₂) based on combustion source emission measurements or more sophisticated estimation techniques such as the ambient ratio method (ARM) or apply simplifying assumptions that conservatively assume that all NO_x is NO₂ or use a default NO/NO₂ ratio of 0.75? The consequences for use and reliance on simplified estimation approaches could result in misleading conclusions and incorrect impact assessments.

The WRAP III inventories completed in previous basins, like the Phase I and II inventories that preceded it, report only total NO_x emissions and do not attempt to apportion NO_x into NO, N₂O and NO₂ species. The WRAP III is an inventory effort only, and it does not

attempt to assess the impact of oil and gas emissions upon ambient air quality. While WRAP supports and encourages the use of the inventories for air quality impact assessments, we believe that the scientists and air quality specialists conducting those studies can best determine the appropriate NO_x speciation methodology for their assessment. Therefore we are not proposing to speciate NO_x emissions for the Williston Basin study.

2. **With the approach suggested and time and budget available, the objectives are: 1 – not achievable; 2 – possibly achievable; 3 – likely achievable; 4 – most likely achievable; or 5 – certainly achievable.**

Reviewer 21A-02 (Rating: 5)

No Comments

Reviewer 21A-03 (Rating: 5)

This inventory will require significant work due to the number of small sources. However, the approach that IPAMS utilizes where knowledge and expertise is drawn from the State agency and from the industry make the project very workable. It builds on expertise that already exists in the effort to create the data. It is important to note that both the State of North Dakota and the oil and gas industry must place high priority on the work since it will be the baseline for future work/decisions in the industry. The fact that similar inventories were successfully produced by IPAMS in other states utilizing a similar approach bodes well for the expectation of success on this project. Again, the Oil and Gas Industry and the State Department of Health will play a significant role in this project and are both aware of the importance of the project. Therefore, both are expected to place a high priority on their portion of the effort as they provide substantial resources and information. In addition, the North Dakota Oil and Gas Division may be able to provide valuable information and expertise necessary to achieve the time and budgetary goals and/or to facilitate the process.

Reviewer 21A-04 (Rating: 2)

The successful completion of the project objectives requires \$70K cofunding from Williston basin producers and active participation by industry to provide voluntary data. The minority NDIC funding position may preclude or limit substantial project guidance and direction especially with respect to changes or expansion in the scope of work. Data quality and reporting consistency could also significantly increase the required effort to construct an accurate inventory. Identifying proper experienced individuals within individual companies, tribal lands, and regulatory agencies with diverse objectives presents formidable challenges that can further encumber and preclude efficient data collection, review, and verification.

The funding request was not meant to preclude participation by NDIC, but was rather an attempt to request a reasonable amount that seemed plausible. We welcome participation from NDIC, and have accommodated requests from other states as well. However, in order

to ensure the inventory is compatible across the region, we recommend a similar scope to other basins across the West.

- 3. The quality of the methodology displayed in the proposal is: 1 – well below average; 2 – below average; 3 – average; 4 – above average; or 5 – well above average.**

Reviewer 21A-02 (Rating: 3)

...have no basis to know what's "average", the methodology seems straight forward which translates to "average"...

Reviewer 21A-03 (Rating: 5)

Using and comparing information from both the state agency and the oil and gas producers as proposed in this application is an exceptional methodology to gather and quality assure this data. This is especially true since it deals with numerous small sources some of which may be relatively unregulated, not tracked, or even overlooked in prior estimates. This project will focus on compiling information from both the industry and state agency perspectives to achieve a better accounting of these sources; allowing future decision making to be based on information that has been vetted by parties who will rely on it. The applicant accurately points out that permit work completed by the agency often uses "higher" emissions (potential emissions) rather than actual emissions and that the information often includes sources which were proposed but never built – or another possibility not mentioned facilities which were built and have been shut down. The application does not specify how oil and gas facilities on the Indian Reservation will be handled or if they will be assessed. These wells fall under the jurisdiction of the Environmental Protection Agency and are not tracked by the North Dakota Department of Health.

We apologize for neglecting to address tribal lands in the application. We will certainly include all sources on Indian tribal land within the boundaries of the study area for the Williston Basin. Following the methodology used for previous basins where there are oil and gas activities on tribal land, our survey to producers includes their operations on tribal land. For larger point-source facilities such as gas processing plants and compressor stations, we request information from EPA on permitted sources. The EPA database is likely to contain only permit information for large, Part 71 sources (the equivalent of Title V sources for non-tribal land). These are typically gas processing plants and very large, central compressor stations where the emissions from these facilities exceeds 100 tons per year. For the remaining point sources on tribal lands for which no permit data is available, which are likely to be small and medium-sized compressor stations but could also include stand-alone tank batteries or other sources, we survey the midstream and production companies that operate these sources on tribal land. A similar approach was used in the South San Juan Basin in New Mexico and the Uinta Basin in Utah. For purposes of oil and gas statistics, please note that the oil and gas database software that we are using tracks all wells, drilling and production in all of the states covered in this study, for both tribal and non-tribal land.

Reviewer 21A-04 (Rating: 4)

Although the methodology for calculations and selection of emission factors are primarily based on EPA guidance, the stakeholder peer review process outlined in the section titled "Standards of Success" strengthens the resulting inventory by subjecting the technical approach, methodology, assumptions, and inventory to scrutiny. This project element is essential to improving data quality and completeness. The discussion of methodology lacked sufficient detail (e.g. section titled "Techniques to Be Used, Their Availability and Capability" stated that a detailed statement of work containing all emissions calculations and scaling factors can be provided to the grant review committee upon request) that would be expected in other analogous proposal workscope discussions. EPA guidance is typically intended to be conservative and may not be appropriate for select air quality analyses. Care should be taken to discuss the limitations and assumptions used in compiling the inventory. Recommendations for future refinements and improvements should be included. It should be noted that even with data from five producers representing 40% of the basin and a goal of 50% participation, scaling the emissions to the balance of sources will result in substantial inventory uncertainty. Insufficient detail regarding specific steps to be taken to ensure data quality has been provided in this grant application. A discussion in the section titled "Why the Project is Needed" provides a detailed explanation on flash losses from storage tanks however, fails to provide the preferred approach to estimating these emissions. In addition, this discussion seemed out of place and highlighted two of many VOC sources that prove problematic for estimating emissions. For example, process simulation tools such as HYSIS are preferred to throughput based emission factor approaches. However, no detail is provided to make an informed judgment on the quality of the emissions estimation approach. In addition, this section discusses that the WRAP Phase III will help to quantify VOC emissions from 23 categories of sources that are not defined or further discussed. The lack of specificity in terms of defining all sources to be included in the inventory including the corresponding emission estimation methodology result in an inability to assess claims of credible, accurate and comprehensive inventory.

We apologize for the lack of specificity. Due to space constraints, we did not provide several technical details. However, attached is a report from one of the completed basins which includes the project methodology and details on the source categories. The methodology has been refined by experience in five basins.

Data Quality Steps:

1. The data quality assurance procedures are as follows:
2. The survey responses received from the Operators are first checked for completeness and compared to each other. Operators are requested to provide missing data if possible. Outlying data are also investigated directly with the operators to confirm and document the reasons for atypical responses. Outlying data that cannot be supported are discarded from the study.
3. Weighted averages are applied to the Operator survey data to develop source specific emission factors. These emission factors are compared against known air permit

applications and the WRAP results for previous basins. Again, any unusual or unexpected results are further investigated.

4. Draft emission inventories are distributed to the basin operator group for review and comparison with their basin specific experiences. Comments from the Operator group are subsequently investigated.
5. Mid-term projections are also quality assured with operators to determine that the future projected emissions are in line with reasonable growth scenarios.
6. Inventory results are then presented to the WRAP oil and gas working group. Federal and State agencies, industry and other stakeholder groups are encouraged to participate in the call and are afforded the opportunity to comment on the inventory and results.

4. **The educational contribution of the proposed work to specifically address North Dakota Industrial Commission/Oil and Gas Research Council goals will likely be: 1 – extremely small; 2 – small; 3 – significant; 4 – very significant; or 5 – extremely significant.**

Reviewer 21A-02 (Rating: 4)

Especially in the goal of “...developing baseline information that will lead...”

Reviewer 21A-03 (Rating: 3)

The emission inventory proposed by this project will be the basis for technical air quality reports/assessments in the years to come. Its focus is on actual emissions not on potential emissions or estimates from incomplete data. It also provides a mechanism for future updates which may be critical with the fast-track growth currently occurring in the Bakken. This inventory will allow for good science to be used for future decision making which may be critical for the industry. This project may appear to relate only to the environmental aspect of the Oil and Gas Research goals. However, the information that is expected to be gained from this project will provide significant improvements to the current inventory which will be critical in proper evaluation of the industry and the assessments of air quality conducted in the future. Therefore, this project directly ties the environmental goals to the goals that list oil and gas development, growth, opportunity, and public awareness. In doing so, it reaches beyond the environment and can effectively lead to positive advancement in every one of the goals outlined in the Mission Statement.

Reviewer 21A-04 (Rating: 4)

Regulatory decisions will rely heavily on the inventory information obtained through this project. An accurate emissions inventory is central to permitting oil and gas growth while maintaining air quality emissions objectives within the Williston basin. Inventory errors and over simplified assumptions can lead to unnecessary controls and constrained growth. Emissions data absent the corresponding source parameters (stack or vent heights, locations, exit velocities, exit temperatures, diameters, etc.) can lead to generalized source characterization, improper impact assessments and errant control strategies. Recent ozone concerns in WY and within the inter mountain west support the need to develop and maintain accurate emission inventories to ensure equitable treatment

of oil and gas sources. Consideration of production decline and migration toward actual production volumes rather than potential to emit calculations provide more accurate emission estimates leading to better informed regulatory decisions.

The scope of work of this study does not include the preparation of model-ready emissions, only the development of regional emissions inventories. We gather a significant amount of data that can be subsequently used for purposes of developing model-ready area source emissions, including speciation data and the development of spatial surrogates. Point source modeling data such as stack heights, locations and exit velocities are not included in this data gathering but are typically available in permitting files. However, it should be noted that model-ready emissions can be developed from these baseline inventories.

5. The principal investigator's awareness of other current educational efforts being conducted by other persons or entities related to the proposal is: 1 – very limited; 2 – limited; 3 – adequate; 4 – better than average; or 5 – exceptional.

Reviewer 21A-02 (Rating: 5)

...because involved already with projects for other basins...

Reviewer 21A-03 (Rating: 5)

IPAMS/WRAP has completed similar projects in other areas of the region. These projects were largely identical to the proposed project. IPAMS/WRAP has worked in all aspects of the proposal and are knowledgeable with EPA estimating techniques and procedures, the shortcomings of these techniques and models, as well as recent information from others states (Texas, Oklahoma, Wyoming, and Colorado) who have generated specific information which may be applied to North Dakota information and estimates.

Reviewer 21A-04 (Rating: 4)

The WRAP Phase III inventory project builds on the Phase I and II efforts and expectantly includes lessons learned and process refinements/improvements from prior efforts. Coupled with a peer review process the resultant inventory is expected to withstand technical challenges, provided it isn't improperly applied (i.e. wide range of applications ranging from regional haze and NAAQS objectives to environmental impact statements). However, the proposal fails to provide a detailed discussion of the methodology, emission estimation hierarchal approaches, definition of sources to be included, source parameters to be included, or reference materials relied on to develop a credible, accurate and comprehensive inventory. Recent aggressive regulatory actions including potential oil & gas source aggregation, mandatory GHG inventories, 1-hour NO₂ NAAQS, etc. have broadened □standard□ criteria pollutant data needs and care must be taken to ensure adequate data is collected, analyzed, and reviewed to maximize the utility of regional emission inventories.

We apologize for the lack of detailed methodology and emissions estimations techniques due to space constraints. We have attached the results from the San Juan Basin in New Mexico, which contains the detailed methodology and emissions calculations, especially starting on page 11.

- 6. The background of the investigator(s) as related to the proposed work is: 1 – very limited; 2 – limited; 3 – adequate; 4 – better than average; or 5 – exceptional.**

Reviewer 21A-02 (Rating: 5)

Same comment as above

Reviewer 21A-03 (Rating: 5)

IPAMS/WRAP is well aware of the environmental requirements of the Environmental Protection Agency and that specific State Air Quality requirements exist in each state. They have a history of working with both regulatory agencies and with industry in the region. Their experience is significant and their reputation is sound. WRAP's position and role as a neutral and unbiased partner should be a positive aspect of this project.

Reviewer 21A-04 (Rating:4)

The work group qualifications and experience obtained during previous project phases is thought to be better than average for completing the regional oil and gas inventory and fulfilling project objectives. The completion of Phase III inventories for 5 other basins illustrates extensive regional inventory experience.

- 7. The project management plan, including a well-defined milestone chart, schedule, financial plan, and plan for communications among the parties involved in the project . is: 1 – very inadequate; 2 – inadequate; 3 – adequate; 4 – very good; or 5 – exceptionally good.**

Reviewer 21A-02 (Rating: 5)

- help from “Buys & Associates” takes care of this
- Bi-weekly meetings are good
- Status reports good
- Very good progress-checking plan

Reviewer 21A-03 (Rating: 4)

The role of each of the participants is adequately outlined in the application. Peer review and quality assurance is an integral part of the process. Contribution from appropriate government agencies and industry are an integral part of the process which will help to ensure that there is opportunity for comments, ideas, and concerns to be considered. The timetable outlined in the proposal appears achievable; however, due to the number of sources, it will require extensive work. The biweekly meetings and monthly status reports will be useful to help ensure that the project timelines are achieved and that any problems may be dealt with expeditiously.

Note that although IPAMS is believed to be able to have accurately estimated the time and budget requirements for this project, I would have appreciated some information relating to the successes (and lessons learned) from the prior projects that were completed – Did they meet their time and budget requirements? If not, what changes were made to the estimates for this project?

The estimates for the time and budget reflected in the proposal are based on experience with the other basins. Originally with the first few basins, our budget and time estimates were much too aggressive. We found that although the surveys asked for data to be provided in a specific format, operators provided their data in their own formats, and more effort was necessary to get the data into the standard format. We also had a problem obtaining state permit data from most states, because the data were not always in a readily useable format. There is some uncertainty with regard to North Dakota Department of Health's permit data, but time and budget have been built into the estimate to account for that process.

In general, the experience in the other five basins have enabled us to refine our time and budget estimates for North Dakota, which we feel very confident of. In addition, the fact that we have already received survey responses for 40% of the production, and have other operators ready to submit data when the project resumes makes us even more confident that we can achieve the time and budget projections.

Reviewer 21A-04 (Rating: 3)

Monthly status reports, biweekly meetings among project participants, and bi-monthly peer review stakeholder calls should provide ample opportunity for communication, feedback, and active project management. A 7 month timetable was proposed and is based on project experience for 5 other basins. The lack of well-defined inventory sources and methodology specificity, quality assurance/quality control provisions, and verification processes preclude a thorough assessment of project management plans. Buys and Associates, an unknown entity to this reviewer, are responsible for both technical integration and QA.

Please see the attached methodology in the San Juan Basin report.

- 8. The proposed materials and media to be developed or used are: 1 – very inadequate; 2 – inadequate; 3 – adequate; 4 – very good; or 5 – exceptionally good.**

Reviewer 21A-02 (Rating: 5)

No equipment to be purchased.

Reviewer 21A-03 (Rating: 5)

No equipment is to be purchased

Reviewer 21A-04 (Rating: 5)

No equipment is to be purchased

- 9. The materials and media available and to be purchased for the proposed educational effort are: 1 – very inadequate; 2 – inadequate; 3 – adequate; 4 – notably good; or 5 – exceptionally good.**

Reviewer 21A-02 (Rating: 5)

No comments

Reviewer 21A-03 (Rating: 5)

Existing facilities and equipment should be readily available for the project.

Reviewer 21A-04 (Rating: 3)

No discussion was provided to judge available computing equipment, software, facilities, etc. The dissemination of deliverables and work products via a web link is progressive and forward thinking provided that access to interim deliverables is strictly controlled and a review tracking process is in place prior to broadly disseminating final data. It is assumed that the facilities and equipment available to this work group for previous Phase III inventories were adequate and no new equipment or facility is required to complete this scope of work.

No interim products or data are disseminated until the final review by producers, the quality assurance contractor and WRAP. Results are presented to the WRAP oil and gas working group before final posting.

- 10. The proposed budget value relative to the outlined work and the financial commitment from other sources is of: 1 – very low value; 2 – low value; 3 – average value; 4 – high value; or 5 – very high value. (See below)**

Reviewer 21A-02 (Rating: --)

- Budget just mentions “fees” so can’t tell what the \$\$ are actually used for.
- The budget reveals next to nothing, so I can’t judge it because it’s too vague.

We apologize for the lack of specificity. Our inexperience with the OGRC grant application process caused us to cut corners for space constraints in areas that we shouldn't have. All costs for the project are contractor expenses, since costs for data purchase have already been made in previous phases of the WRAP regional inventory, which this project is benefitting from.

1. Gather remaining survey responses and compile survey data: \$19,000
2. Gather permitting data from state regulators and EPA, and verify data with producers: \$9,500
3. Prepare baseline inventory: \$25,000
4. Quality assure inventory: \$15,000
5. Develop mid-term projections: \$15,000
6. Quality assure projections: \$8,000
7. Prepare reports and present to WRAP Oil & Gas Working Group: \$3,500

Reviewer 21A-03 (Rating: 5)

The project will provide information that may prove invaluable to the oil and gas industry and to the state agencies. The commitment in terms of both the portion of project cost at well over 50% of the total and man hours that will be provided by the producers in the region is substantial for the project. The data that is achieved from the project will be used as the basis for numerous air quality assessments in the future. Therefore, it will provide industry with a roadmap of how to efficiently and effectively monitor, reduce, and manage emissions possibly in lieu of future regulations which industry does not play a role.

Reviewer 21A-04 (Rating: 4)

The project funding leverages an additional \$70K or roughly 74 percent of the total cost estimated to complete the project work scope.

¹ “Value” – The value of the projected work and technical outcome for the budgeted amount of the project, based on your estimate of what the work might cost in research settings with which you are familiar.

Financial commitment from other sources – A minimum of 50% of the total project must come from other sources to meet the program guidelines. Support less than

50% from Industrial Commission sources should be evaluated as favorable to the application.

Section C. Overall Comments and Recommendations:

Reviewer 21A-02

-Good to establish a high-as-possible quality base of data about all types of emissions. The utility of such a database is fairly obvious. This proposal seems quite able to produce that high quality product. I can't judge the budget, so I left that to those who can. If the budget is reasonable, it seems a very worthy proposal.

Reviewer 21A-03

1. Perceived flaws of the Application:

I found the application to be clear and concise in the vast majority of areas. The following shortcomings are noted and are considered to be insignificant:

- The application could have better defined the sources that will be subject to the inventory. The "oil and gas industry" could be defined to include exploration, operating oil wells, storage facilities, gas compression, gas plants, oil movement, etc. For purposes of this application, it is assumed that the project will be focused on oil wells only.
- Oil wells on Indian Reservations in the state are under the jurisdiction of the Federal Environmental Protection Agency (EPA). The application does not acknowledge this and does not outline if these wells are part of the inventory.
- The Timetable Section in the application ends mid-sentence. No information is available to determine what is missing.
- The correct reference to the State Agency involved is the North Dakota Department of Health not the North Dakota Department of Public Health. It is listed correctly once in the application.
- The project will focus on all aspects of exploration and production of oil and natural gas in the Williston, including oil and gas wells, storage, compression, gas plants, and pipelines.
- Failure to address operations on Indian lands is indeed an oversight. As explained above for section 3, we have addressed operations on tribal lands in Utah, Colorado, and New Mexico, and have a process in place to handle them.
- We apologize for the typo, and including 'Public' in the name of the North Dakota Department of Health. The sentence was intended to end just with 'schedule' to read: IPAMS will provide monthly status reports to the OGRC outlining tasks completed, funding status, and project issues that could affect the schedule.

2. Merits of the Application:

The Oil and Gas Research Council Mission Statement includes several Goals and Purposes that deal with the Environment. It is important to note that many issues relating to air quality in North Dakota are currently coming together at this time. A partial list follows:

1. Ongoing far reaching regulations such as Regional Haze and New Source Review
2. New/pending ambient air quality standards promulgated/proposed for particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), and volatile organic compounds (VOCs)
3. Recent findings that oil storage tank emissions called flash emissions, particularly in the Bakken, are significantly higher than originally expected.
4. The current trend for development where a large number of sources is being added each year.

Historically, North Dakota has consistently met all clean air standards (ambient standards) and has been one of only a few states to be considered in “attainment”. This has allowed minor sources such as oil wells in the Oil and Gas Industry the luxury to be treated as sources of minor significance which results in many benefits. However, the factors listed above have the potential for major and sweeping regulatory changes which will greatly affect the industry.

Recommendation:

In review of the application, I believe that this project has significant merit and may prove visionary in providing the foundation used for future decision making. The data will provide a basis to manage the significant changes that may be forthcoming. Specifically, an accurate inventory will be a critical tool which will allow the industry to proactively manage future development. Specifically, it will allow the industry to determine and plan for the procedures and practices that can be implemented in order to continue to develop and advance without causing environmental problems. Likewise, it will allow state regulators to complete fair and accurate air quality assessments to review air quality and the expected impacts of growth in the oil and gas industry. Further, it will provide assurance to the citizens of the state that the industry is taking any steps necessary to operate in a responsible manner and preserve the environment.

Therefore, I strongly recommend that the application be given favorable consideration.

Reviewer 21A-04

Direct previous project team experience and a peer review process should greatly enhance the opportunity for a successful completion of the proposed regional criteria pollutant inventory project. □One size fits all□ inventory approach is inappropriate; inventory must meet its intended purpose and use. Strongly recommend taking adequate time to engage the project team to ensure data quality and consistency. Recommend funding the project.

IPAMS is happy to include additional participation from the North Dakota Department of Health, the North Dakota Industrial Commission, the Oil and Gas Research Council, or others whom the council would like to include. We haven't had that kind of support from other states, and so didn't presume it in our grant application, but we are most welcoming of additional participation within the scope of the WRAP project.