Message

From: Cozzie, David [Cozzie.David@epa.gov]
Sent: 12/18/2018 1:55:58 PM
To: Marsh, Karen [Marsh.Karen@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]
CC: Fruh, Steve [Fruh.Steve@epa.gov]
Subject: FW: API Comments on EPA's Oil and Natural Gas Sector Emission Standards for New, Reconstructed, and Modified Sources; Proposed Rule
Attachments: 2018 12 17 API Final Comments on NSPS OOOOa Proposed Rule.pdf

Importance: High

David A. Cozzie
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From: Matthew Todd <ToddM@api.org>
Sent: Monday, December 17, 2018 5:53 PM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Cozzie, David <Cozzie.David@epa.gov>
Subject: API Comments on EPA's Oil and Natural Gas Sector Emission Standards for New, Reconstructed, and Modified Sources; Proposed Rule
Importance: High

Dear Mr. Peter Tsirigotis:

The American Petroleum Institute is pleased to submit the attached comments, submitted today via regulations.gov, regarding EPA's reconsideration of the New Source Performance Standards ("NSPS") 40 C.F.R. Part 60 Subpart OOOOa, "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Proposed Rule" at 83 Fed. Reg. 52056 (October 15, 2018). API is the only national trade association representing all facets of the oil and natural gas industry, which supports 10.3 million U.S. jobs and nearly 8 percent of the U.S. economy. API's 620 members include large integrated companies as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 40 million Americans. Many of our members are directly impacted by the proposed amendments to the rule.

Throughout the development of the 2012 oil and gas NSPS rule and its amendments in 2016, API has maintained a constructive working relationship with EPA staff to provide operational expertise and emissions data to inform the developments of these important rules. During this time, our objective has remained the identification of cost-effective emission control requirements that reduce VOC emissions for new and modified sources that, as a co-benefit, also reduce methane emissions. Importantly, even accepting all of the proposed recommendations our members have suggested in the attached comments, all oil and gas production emission sources by this and the previous rules will continue to be effectively addressed.

API supports EPA's reconsideration of the rule and appreciates the proposed changes that provide additional clarity for our industry to maintain compliance. However, the proposed rule includes several missed opportunities and, in many circumstances, has increased the stringency of the rules without securing additional environmental benefit. Overly burdensome recordkeeping and reporting, overlapping regulatory requirements with state leak detection and repair programs, and a reinterpretation of several important aspects of the rule are all examples where further improvement is warranted to balance compliance assurance with securing emissions reductions.

Please contact me at toddm@api.org or 202-682-8319 with any additional questions regarding the content of our comments. We look forward to working with your staff as you consider the development of a final rule.

Sincerely,

Matthew Todd

Matthew Todd
API
202.682.8319