



Midstream's Greatest Resource

November 6, 2014

Air and Radiation Docket and Information Center
U.S. Environmental Protection Agency
Attention: Docket ID No. EPA-HQ-OAR-2012-0322
Mailcode-28221T
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Comments on Supplemental Proposal to Address Affirmative Defense Provisions in States Included in the Petition for Rulemaking and in Additional States; Docket ID No. EPA-HQ-OAR-2012-0322

Dear Docket Clerk:

The Gas Processors Association (GPA) respectfully recommends that the U.S. Environmental Protection Agency (EPA) withdraw the proposed *Supplemental Proposal To Address Affirmative Defense Provisions in States Included in the Petition for Rulemaking and in Additional States* published in the *Federal Register* on September 17, 2014 (70 Fed. Reg. 55,920). GPA supports the comments submitted by the Texas MSS Working Group on November 6, 2014. For the reasons articulated in the Texas MSS Working Group comments, GPA does not agree with EPA that issuing these State Implementation Plan (SIP) calls, is the necessary progression from *NRDC v. EPA*, 749 F.3d 1055 (D.C. Cir. 2014).

GPA has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA is composed of 130 corporate members that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as "midstream activities." Such processing includes the removal of impurities from the raw gas stream produced at the wellhead, as well as the extraction for sale of natural gas liquid products (NGLs) such as ethane, propane, butane and natural gasoline. GPA members account for more than 90 percent of the NGLs produced in the United States from natural gas processing. GPA

members operate facilities in several of the states which have been identified in the EPA's supplemental proposed findings of substantial inadequacy and proposed SIP calls, and our members periodically assert and rely on the affirmative defense provisions that are the subject of EPA's proposal.

Thank you for the opportunity to comment on this proposed rule. We offer our assistance as EPA considers the public comments and prepares a final rule.

Sincerely,

A handwritten signature in black ink that reads "Jeff Applekamp". The signature is written in a cursive, flowing style.

Jeff Applekamp
Vice President of Government Affairs
Gas Processors Association