



MIDSTREAM'S GREATEST RESOURCE

October 7, 2015

VIA ELECTRONIC FILING

Environmental Protection Agency
EPA Docket Center
Mailcode 2821T
Attention Docket ID No. EPA-HQ-OAR-2015-0216
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Extension to Public Comment Period for Docket ID No. EPA-HQ-OAR-2015-0216; Notice of Availability; Release of Draft Control Techniques Guidelines for the Oil and Natural Gas Industry; Federal Register Vol. 80, No. 181 (Friday, September 18, 2015); RIN 2060-ZA22

Dear Sir/Madam:

The Gas Processors Association (GPA) respectfully requests an extension to the comment period for the release of “Draft Control Techniques Guidelines for the Oil and Natural Gas Industry” published in the Federal Register on September 18, 2015 (80 FR 56577). GPA is requesting the comment period be extended **60-days** beyond the November 17th, 2015 comment period deadline.

GPA has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA is composed of over 100 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.

EPA is announcing in the Federal Register the availability of a draft Control Techniques Guidelines (CTG) document for select oil and natural gas industry emissions sources. This document, when finalized, will provide state, local, and tribal air agencies with information to assist them in determining reasonably available control technology (RACT) for volatile organic compound (VOC) emissions from such sources. This document will have a substantial impact on midstream operations. In addition, this regulation is just one of four regulations EPA proposed simultaneously as part of the President’s “Climate Action Plan” to reduce methane emissions from the oil and natural gas industry. Each of these proposed rules needs to be adequately reviewed to understand the full impacts of each rule as well as the collective impacts of these new regulations.

Many of the same personnel that are working to evaluate this proposed rule are also evaluating EPA's other proposed rules. As proposed, this rule will have significant financial and resource impact on our members. GPA members possess significant information that is relevant to the proposed rules and additional time is necessary in order to thoughtfully assess, compile, and provide such information to the EPA so that the EPA may consider such information as it works towards finalizing these rules. It is only reasonable to allow an additional 60 days to each of these rule proposals to allow sufficient time to thoroughly review the proposal, fully understand its impacts, and develop thoughtful comments and recommendations.

GPA has worked collaboratively with EPA for many years and is committed to continue in this effort to strive for cost-effective rules that minimize the impact to the domestic energy infrastructure.

We appreciate the agency's consideration of our request to extend the comment period 60 days and look forward to working with the agency on the final rule. If you have questions please contact me at (202) 279-1664 or by email at mwhite@gpaglobal.org or Melanie Roberts, GPA Environmental Committee Chair, at (713) 584-1422 or by email at mroberts@targaresources.com.

Sincerely,

Matthew Hite
Vice President of Government Affairs
Gas Processors Association

cc: Charlene Spells, U.S. EPA

