



January 9, 2015

Environmental Protection Agency
EPA Docket Center
Mailcode 28221T
Attention Docket ID No. EPA-HQ-OAR-2014-0831
1200 Pennsylvania Avenue NW.,
Washington, DC 20460

Re: Request for Extension to Public Comment Period Docket ID No. EPA-HQ-OAR-2014-0831

Dear Docket Clerk:

The Gas Processors Association (GPA) respectfully requests an extension to the comment period for the proposed “Greenhouse Gas Reporting Rule: 2015 Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems” published in the *Federal Register* on December 9, 2014 (79 FR 73148). GPA is requesting the comment period be extended **60-days** beyond the current February 9th, 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 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.

The proposed rule revisions expand the requirements of 40 CFR Part 98 Subpart W to “gathering and booster stations.” As such, the proposed rule would have significant impact on the GPA membership because it owns and operates a significant majority of the thousands of “gathering and booster stations” that would be subject to the rule.

As EPA is aware, the 60 day comment period from December 9, 2014 to February 9, 2015 coincides with (1) the publication and implementation of the rule published on November 25, 2014 entitled “Greenhouse Gas Reporting Rule: 2014 Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems”; (2) testing of the XML schema for Inputs Verifier Tool which began on December 1, 2014 and closed on December 22, 2014; (3) review of 2014 XML schema and reporting forms (webinar held on November 20, 2014, comments due on December 2, 2014, just five working days later); (4) preparation of 2014 annual reports (underway and ongoing until March 31), which includes reporting four years of

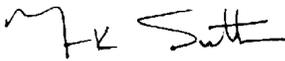
Subpart W data and upgrading to incorporate the Inputs Verifier Tool; (5) other non-Greenhouse Gas Reporting Rule proposed rule revisions, agency guidelines and final rules in the same period; and (6) a two week holiday period.

Many of the same resources that are working to evaluate EPA's proposed expansion of Subpart W have been, and will continue to be, committed to these items, and it is only reasonable for EPA to extend the comment period for this significant rulemaking.

As proposed, this rule would have a significant financial and resource impact on our members. It is critical that enough time be allowed to thoroughly review the proposal, fully understand its impacts, and develop thoughtful comments and recommendations. Thus, GPA is requesting this 60-day extension to the current comment period.

We appreciate the agency's consideration of our request to extend the comment period and look forward to working with the agency on the final rule. Please contact me at (918) 493-3872 or by email at msutton@gpaglobal.org or Douglas Jordan, GPA Environmental Committee Chair, at (281) 610-4291 or by email at douglas_jordan@sw.com.

Respectfully Submitted,



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CC:

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