



Midstream's Greatest Resource

April 22, 2015

VIA ELECTRONIC FILING

Gina McCarthy, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

**RE: EPA-HQ-OAR-2010-0505-4754
Oil and Natural Gas Sector; Definitions of Low Pressure Gas Wells and Storage
Vessels**

Dear Administrator McCarthy:

Gas Processors Association (GPA) submits this comment letter in support of the proposed NSPS Subpart OOOO rule revisions as published in the March 23, 2014 Federal Register (2015-06593). We appreciate the EPA's reconsideration of the NSPS Subpart OOOO "1.5" final rule posted in the December 31, 2014 Federal Register (2014-30630). Specifically we support the removal of provisions concerning storage vessels connected or installed in parallel and revisions to the definition of "storage vessel".

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. As such, our membership is significantly impacted by the actions of this final rule.

GPA appreciates the efforts undertaken by the EPA to address many issues of concern that we identified in the NSPS Subpart OOOO rules. Specific to this letter are the revisions to the definition of storage vessel that clarify and address the requirements for storage vessels that are taken out of service and returned to service (60.5365(e)(4)). We believe the rule revisions do

help clarify the rule applicability to storage vessels that are removed from and returned to service.

GPA also appreciates the EPA's reconsideration of the rule in regard to storage vessels "installed in parallel" and "connected in parallel". We support the proposed rule revisions to remove the provisions concerning storage vessels connected or installed in parallel and revisions to the definition of "storage vessel". EPA addressed our concerns regarding the parallel storage vessels provisions in our comment letter dated February 19, 2015.

Thank you for your attention to this matter. If you have any questions or need additional information, please do not hesitate to contact me by email at mhite@gpaglobal.org or by phone at (202) 279-1664.

Sincerely,

Matthew Hite
Vice President of Government Affairs