June 16, 2016

VIA ELECTRONIC FILING

EPA Docket Center (EPA/DC)
Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Extension to Public Comment Period for Proposed Information Collection Request, Docket ID No. EPA-HQ-OAR-2016-0204; Proposed Information Collection Request; Comment Request; Information Collection Effort for Oil and Gas Facilities; Federal Register Vol. 81, No. 107 (Friday, June 3, 2016)

Dear Sir/Madam:

GPA Midstream Association respectfully requests an extension to the comment period for the “Proposed Information Collection Request; Comment Request; Information Collection Effort for Oil and Gas Facilities” published in the Federal Register on June 3, 2016 (81 FR 35763). GPA is requesting the comment period be extended **30-days** beyond the August 2, 2016 comment period deadline.

GPA Midstream has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA Midstream 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 Midstream members account for more than 90 percent of the NGLs produced in the United States from natural gas processing. Under the proposed Information Collection Request (ICR), GPA Midstream represents members in the “onshore petroleum and natural gas gathering and boosting facility” and “onshore natural gas processing plant” categories.

The proposed collection request directly affects the midstream segment of the oil and gas industry. The supporting statement for the proposed ICR states EPA will send the request to 476 gathering facilities and 326 processing plants. As such, the proposed rule would have significant impact to the GPA Midstream membership.

As proposed, the ICR will have both a financial and resource impact on our members when it is released. GPA Midstream members possess significant information that is relevant to the proposed ICR and additional time is necessary in order to thoughtfully assess, compile, and
provide such information to EPA as it works towards finalizing the ICR. It is only reasonable to allow an additional 30 days for public comment on the ICR proposal to allow sufficient time to thoroughly review and fully understand its impacts, and to develop thoughtful comments and recommendations to EPA.

The information requested by EPA will be highly sensitive in nature, and clearly should qualify as confidential business information, in accordance with special rules governing information obtained under the Clean Air Act. In addition, the information requested by EPA meets the criteria for protection under the Confidential Information Protections and Statistical Efficiency Act of 2002 (CIPSEA). Therefore, we assert claims for protection of the information provided and expect that the information will be used strictly for statistical purposes.

GPA Midstream 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 30 days and our request for confidential business information and CIPSEA protection for the information EPA is requesting. We look forward to working with the agency on the ICRs. If you have questions please contact me at (202) 279-1664 or by email at mhite@gpaglobal.org or Melanie Roberts, GPA Midstream Environmental Committee Chair, at (713) 584-1422 or by email at mroberts@targaresources.com.

Sincerely,

Matthew Hite
Vice President of Government Affairs
GPA Midstream Association