

**Comment 1 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Mark A.

Last Name: Smith

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Greenhouse Gas Regulations

Comment:

See Attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-oilandgas2016-AG0AZ1EiAzsEXQlo.pdf>'

Original File Name: Mark A Smith 16-7-2.pdf

Date and Time Comment Was Submitted: 2016-06-29 08:50:45

No Duplicates.

**Comment 2 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Joe

Last Name: Landes

Email Address: jlandes@spl-inc.com

Affiliation:

Subject: SPL comments on proposed GHG Ruling

Comment:

I submitted my comments a couple of days ago, but did not find them in the viewable record. Therefore, I am trying again.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-oilandgas2016-B3RUIgNuVVIXIwdi.docx'

Original File Name: SPL Response To CARB Proposed Rule.docx

Date and Time Comment Was Submitted: 2016-07-15 07:44:50

No Duplicates.

## **Comment 3 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 45 Day.**

First Name: Heather

Last Name: Shelby

Email Address: hshelby@edf.org

Affiliation: Environmental Defense Fund

Subject: 3,974 comments in support of strong methane regulations

Comment:

To Whom It May Concerned:

Attached, please find the signatures of 3,974 EDF Activists from across California who have submitted electronic comments in favor of your proposed regulation for greenhouse gas emission standards for crude oil and naturalgas facilities.

The comment they each submitted reads:

"I'm writing today to support your proposed rules limiting methane pollution from California's oil and gas industry, and to ask you to strengthen them before finalization.

Several provisions represent some of the strongest standards in the nation, and I am pleased that the regulations:

- \* Covers both new and existing sources,
- \* Uses better science, evaluating methane's impact based on its 20-year impact rather than 100-year value,
- \* Requires comprehensive quarterly inspections of equipment that is designed to vent (like pneumatic controllers) and components that can leak
- \* And includes key provisions moving California away from venting and flaring wasted gas, a strategy that limits both climate pollution and smog-forming gases that harm human health.

But there are also several key improvements I would like to see. Please update the final rule to improve elements of leak detection and repair by eliminating provisions that currently allow for a reduction in inspection frequency. California communities also deserve a faster implementation timetable, meaning inspection requirements should start next year and not be delayed until 2018. Finally, your agency needs to look at all the benefits of reducing toxic air chemicals as part of its regulatory analysis, because only a full evaluation will show how cheap and effective these rules are and resist the oil and gas industry pushback.

In strengthening and finalizing these critical rules, the California Air Resources Board will ensure that the Golden State remains a leader in clean energy and climate action."

Please let me know if you have any questions or concerns about this submission.

Thank you for your consideration,

Heather Shelby  
Activism & Engagement Manager  
Environmental Defense Fund  
(202) 572 3242  
hshelby@edf.org

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-oilandgas2016-VxJXCQZEBxgAU1AU'

Original File Name: EDF\_CARB\_OilAndGas2016.csv

Date and Time Comment Was Submitted: 2016-07-15 13:10:40

No Duplicates.

## **Comment 4 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 45 Day.**

First Name: Christopher  
Last Name: Lish  
Email Address: lishchris@yahoo.com  
Affiliation:

Subject: Please quickly finalize strong methane safeguards  
Comment:

Monday, July 18, 2016

Subject: Please quickly finalize strong methane safeguards --  
Notice of Public Hearing to consider the Proposed Regulation for  
Greenhouse Gas Emission Standards for Crude Oil and Natural Gas  
Facilities.

Dear California Air Resources Board Chair Nichols and fellow board  
members,

I'm writing to thank the Air Resources Board for developing  
critically important rules to address methane pollution from the  
oil and gas industry in California, and to urge the agency to  
quickly finalize these safeguards.

"Then I say the Earth belongs to each generation during its course,  
fully and in its own right, no generation can contract debts  
greater than may be paid during the course of its own existence."  
-- Thomas Jefferson

Full implementation of these new protections would make California  
a national leader in reining in out-of-control methane pollution  
from the oil and gas industry. The comprehensive scope of these  
rules--including addressing both new and existing sources, both  
onshore and offshore infrastructure, and setting monitoring  
standards for natural gas storage sites like Aliso Canyon--avoid  
many of the loopholes and weaknesses of other state and federal  
standards.

"It is our task in our time and in our generation, to hand down  
undiminished to those who come after us, as was handed down to us  
by those who went before, the natural wealth and beauty which is  
ours."  
-- John F. Kennedy

However, in addition to ensuring that these rules aren't weakened  
in any way, I urge the Air Resources Board to strengthen a few  
provisions, including:

- \* Require operators to regularly find and fix leaks, and remove the  
provision allowing operators to "step-down" from quarterly to  
annual inspections depending on whether they find leaks;

- \* Do not exempt sources of methane such as low-bleed pneumatics;

\* Ensure that agency cost estimates take into account the value of reducing pollution from oil and gas industry in California communities, including reducing exposure to toxics.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."  
-- Theodore Roosevelt

The massive, nearly four-month-long methane leak in Porter Ranch was a wakeup call that the lax regulation of existing oil and gas facilities is an immediate threat to our health and our climate. That's why I support these new safeguards and urge the Air Resources Board to implement the strongest rules possible without delay.

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."  
-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-07-18 07:40:04

No Duplicates.

**Comment 5 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Patrick

Last Name: Von Bargaen

Email Address: patrick@methanesolutions.org

Affiliation: Center for Methane Emissions Solutions

Subject: Comments on Proposed Regulation for GHG Emission Standards for Oil & Gas  
Comment:

Please see comment letter attached below.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-oilandgas2016-AmEAZ1Q5V21VNVQ7.docx'

Original File Name: California Comments July 18 2016.docx

Date and Time Comment Was Submitted: 2016-07-18 08:12:43

No Duplicates.

**Comment 6 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Marc

Last Name: Joseph

Email Address: mdjoseph@adamsbroadwell.com

Affiliation:

Subject: CUE Comments on the Proposed Regulation

Comment:

Attached is the Coalition of California Utility Employees Comments on the Proposed Regulation for Greenhouse Emission Standards for Crude Oil and Natural Gas Facilities.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-oilandgas2016-ADFVYwc3WDoKIQEw.pdf>'

Original File Name: 1011-1132rc - CARB GHG Emissions Letter.pdf

Date and Time Comment Was Submitted: 2016-07-18 09:28:18

No Duplicates.



**Comment 7 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: John

Last Name: Boehme

Email Address: jboehme@aglresources.com

Affiliation: Central Valley Gas Storage, LLC

Subject: Comments of the ISPs regarding OILANDGAS2016

Comment:

The Independent Storage Providers (Central Valley Gas Storage, LLC, Gill Ranch Storage, LLC, Lodi Gas Storage, L.L.C., and Wild Goose Storage, LLC; collectively, "ISPs") offer the attached comments and recommendations regarding the California Air Resources Board's ("ARB") Proposed Regulation Order modifying Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 13.

If you have any questions or need the document submitted in a different form, please let me know.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-oilandgas2016-VDVTJwBjBAGAYVM7.pdf'

Original File Name: ARB GHG Regulation ISP Comment Letter 07182016.pdf

Date and Time Comment Was Submitted: 2016-07-18 11:09:04

No Duplicates.

## **Comment 8 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 45 Day.**

First Name: Michele

Last Name: Prichard

Email Address: mprichard@libertyhill.org

Affiliation: Liberty Hill Foundation

Subject: Comments urging strengthening of CARB's Proposed Regulation on Oil & Natural Gas Production

Comment:

The Liberty Hill Foundation wishes to offer brief comments on the proposed Oil and Natural Gas Production Processing, and Storage (the "Oil & Gas rule") regulation. We appreciate efforts of the California Air Resources Board (CARB) in developing the regulation, and urge the strengthening of measures to prevent practices leaving communities unprotected.

Our foundation staff does not possess the technical expertise to make detailed and specific comments. However, we are acutely aware of the significant health impacts that specific communities in Los Angeles have suffered due to their proximity to active oil and gas drilling operations. For the last twenty years, Liberty Hill has been a significant funder of grassroots, environmental justice organizations in the Los Angeles region.

Liberty Hill issued a report in September 2015, "DRILLING DOWN: The Community Consequences of Expanded Oil Development in Los Angeles", documenting five examples of neighborhoods severely impacted by health ailments and disruption to their quality of life from noise, vibration and other air quality impacts. It is very clear that the pollutants and chemicals associated with oil and gas production are harmful to human health, in addition to the strong climate/GHG impacts of methane. Further, we are keenly aware that the industry has been insufficiently regulated and that much of the infrastructure—as demonstrated by the Aliso Canyon disaster—is in a state of significant disrepair. And, the close proximity of some of the facilities in densely populated urban areas like Los Angeles—some within just a few dozen feet of homes and schools—is of great cause for concern.

We encourage the CARB to carefully review the detailed, technical letter submitted by Julia May, Senior Scientist with Communities for a Better Environment which calls for tighter leak standards consistent with best practice in oil refinery standards, accelerated implementation and strengthening of deadlines, exemption allowances, monitoring and enforcement requirements. We also encourage careful review of the letter submitted by Environmental Defense Fund which also calls for accelerated implementation, as well as the removal of the "step down" provision which relaxes the inspection schedule.

Thank you for the opportunity to comment.

Sincerely,

Michele Prichard  
Director, Common Agenda

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-oilandgas2016-Uj4FagRnVmBSJgl9.pdf>'

Original File Name: Liberty Hill Fdn-CARB Rule on OilNatGas-July 2016.pdf

Date and Time Comment Was Submitted: 2016-07-18 12:05:04

No Duplicates.

## **Comment 9 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 45 Day.**

First Name: Lena

Last Name: Moffitt

Email Address: lena.moffitt@sierraclub.org

Affiliation: Sierra Club

Subject: Public comments from Sierra Club members and supporters

Comment:

The Sierra Club has collected public comments submitted by Sierra Club members and supporters on the Air Resources Board's draft safeguards against methane pollution from oil and gas facilities. The Sierra Club has collected those comments in trust and is submitting them now to be included in the public record.

Please find those comments in two attached files: One with the names and public comments of 196 members and supporters who submitted a personalized public comment, and one with the names of 7,281 members and supporters who signed on to endorse the message reproduced below:

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I'm writing to thank the Air Resources Board for developing critically important rules to address methane pollution from the oil and gas industry in California, and to urge the agency to quickly finalize these safeguards.

Full implementation of these new protections would make California a national leader in reining in out-of-control methane pollution from the oil and gas industry. The comprehensive scope of these rules -- including addressing both new and existing sources, both onshore and offshore infrastructure, and setting monitoring standards for natural gas storage sites like Aliso Canyon -- avoid many of the loopholes and weaknesses of other state and federal standards.

However, in addition to ensuring that these rules aren't weakened in any way, I urge the Air Resources Board to strengthen a few provisions, including:

- Require operators to regularly find and fix leaks, and remove the provision allowing operators to "step-down" from quarterly to annual inspections depending on whether they find leaks;
- Do not exempt sources of methane such as low-bleed pneumatics;
- Ensure that agency cost estimates take into account the value of reducing pollution from oil and gas industry in California communities, including reducing exposure to toxics.

The massive, nearly four-month-long methane leak in Porter Ranch was a wake up call that the lax regulation of existing oil and gas facilities is an immediate threat to our health and our climate.

That's why I support these new safeguards and urge the Air Resources Board to implement the strongest rules possible without delay.

Thank you for your consideration.

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I also ask that you disregard the public comments submitted in error by the Sierra Club earlier today, and accept these in their place.

Sincerely,

Lena Moffitt  
Director, Sierra Club Beyond Dirty Fuels Campaign

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-oilandgas2016-AnFWOQFIU3IBdVlz.zip>'

Original File Name: Sierra Club Public Comments.zip

Date and Time Comment Was Submitted: 2016-07-18 14:47:31

No Duplicates.

**Comment 10 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: joey@wspa.org  
Affiliation:

Subject: WSPA Comments on draft Regulation for Greenhouse Gas Emission Standards for  
Crude Oil and  
Comment:

Please see attached WSPA Comments on draft Regulation for  
Greenhouse Gas Emission Standards for Crude Oil and Natural Gas  
Operations (June 2016).  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-oilandgas2016-  
AmxXNARyU15WMwlm.zip'

Original File Name: New Compressed (zipped) Folder.zip

Date and Time Comment Was Submitted: 2016-07-18 15:04:08

No Duplicates.

## **Comment 11 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 45 Day.**

First Name: Irene  
Last Name: Burga  
Email Address: iburga@edf.org  
Affiliation:

Subject: Letter of Support and Suggested Improvements for CARB Oil and Gas Rule  
Comment:

July 18, 2016

California Air Resources Board  
1001 "I" St.  
Sacramento, CA, 95814  
Via Electronic Submittal:  
[http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm\\_period=A](http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm_period=A)

Re: Letter of Support and Suggested Improvements for the Revised  
Draft Regulation for Greenhouse Gas Emission Standards for Crude  
Oil and Natural Gas Facilities

The undersigned organizations would like to submit this letter in support of the proposed rule to regulate greenhouse gas emissions from oil and gas facilities in California.

We commend California Air Resources Board ("CARB") staff for drafting a proposal that directly regulates methane and associated emissions from a diverse suite of new and existing oil and gas sources. Many of the provisions contained in the draft represent models for the nation, including the quarterly baseline inspection requirement for facilities, the continuous ambient air quality monitoring requirement for natural gas storage facilities, and the prioritization of natural gas capture over combustion requirements for a suite of equipment. Nevertheless, there remain opportunities to further enhance the public health and welfare benefits of the rule, and to showcase California as the foremost leader in tackling serious clean air and environmental issues.

As a growing body of evidence demonstrates, there are significant negative public health and environmental impacts associated with pollution from oil and gas - and communities living nearby are the ones most affected. Studies show that along with the release of strong climate pollutants like methane, oil and gas production releases harmful co-pollutants like volatile organic compounds that contribute to ozone formation that impact lung health, and toxic chemicals like benzene, which is a known human carcinogen. The communities most impacted by oil and gas pollution are often low-income communities and communities of color that are already disproportionately vulnerable to socio-economic and environmental hazards. Residents of the most impacted communities throughout California, many of which live less than 30 feet away from

production facilities, have experienced firsthand the harmful effects of oil and gas pollution. Reported symptoms from residents living near oil and gas operations have included onset of asthma and other respiratory problems, nausea, dizziness, loss of smell, and frequent migraines. Additionally, science shows that our most vulnerable and defenseless populations - children, pregnant women, and the elderly - are most susceptible to experiencing negative health impacts from oil and gas pollution.

In order to ensure that the proposed regulation results in maximum reductions in emissions that harm community health, we support CARB in its efforts to strengthen the leak detection and repair requirements applicable to facilities with the potential to leak or inadvertently vent harmful pollutants. Specifically, by removing the step down provision from the proposed draft, the rule is greatly strengthened. By allowing operators to move to relaxed annual inspection standards if leaks are not detected in the first five quarters, operators are dis-incentivized to properly detect, report, and repair leaks. Additionally, due to the century-old infrastructure that exists in most of the state, leaks may happen at any time, and strict quarterly inspections are critical for catching leaks when they are still small and manageable, and before they turn into another Aliso Canyon-scale catastrophe. For these reasons, we believe that in order for the rule to be effective in protecting the health of our families, the step down provision must be removed.

Additionally, we are concerned that the timeframe for implementing the rule has slipped by approximately one year, and believe that the implementation date should be reviewed. While we understand the need to ensure adequate time for Air District staff and industry to prepare for administration and compliance with the rule, we urge CARB to implement the rule expeditiously with no further delays, so that communities can begin experiencing the critical clean air protections afforded by the rule's many strong provisions.

Thank you for taking seriously the concerns of our communities.

Sincerely,

Irene Burga, JD  
Oil and Gas, Environment Justice Fellow  
Environmental Defense Fund

Madeline Stano, JD  
Staff Attorney  
Center on Race, Poverty & the Environment

Vinai Decena RN, PHN  
Northern California Program Coordinator  
Alliance of Nurses for Healthy Environments

Bonnie Holmes-Gen  
Senior Director, Air Quality and Climate Change  
American Lung Association in California

Scott Takahashi, PharmD



Chair  
Asthma Coalition of Los Angeles County

Taylor Thomas  
Research and Policy Analyst  
East Yard Communities for Environmental Justice

Gisele Fong, PhD  
Executive Director  
EndOil

Bill Magavern  
Policy Director  
Coalition for Clean Air

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-oilandgas2016-UDFWIIU2Aw9QOQRt.pdf>'

Original File Name: ARB Oil and Gas Rule Letter of Support.pdf

Date and Time Comment Was Submitted: 2016-07-18 15:12:12

No Duplicates.

**Comment 12 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Mark  
Last Name: Boccella  
Email Address: mark.boccella@flir.com  
Affiliation: FLIR Systems

Subject: Comments to California Code of Regulations - Proposed Rule  
Comment:

Thank you greatly for providing the opportunity for us to submit  
comments to the proposed ARB rule.

Sincerely,

Mark Boccella  
Americas Business Development Manager  
Optical Gas Imaging  
FLIR Systems, Inc.  
9 Townsend West  
Nashua, NH 03063  
Phone: 800 745 4620  
Email: mark.boccella@flir.com

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-oilandgas2016-UTdWPFM7BSQCW1c4.pdf'

Original File Name: FLIR Official Comments to ARB Proposed Rule\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-18 15:43:08

No Duplicates.

**Comment 13 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Terry

Last Name: Boss

Email Address: tboss@ingaa.org

Affiliation: INGAA

Subject: INGAA's Comments on ARB Proposed Regulations for GHG Emission Standards  
Comment:

Attached are comments on the ARB Proposed Regulation for Greenhouse  
Gas Emission Standards for Oil and Natural Gas Facilities from the  
Interstate Natural Gas Association of America (INGAA).

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-oilandgas2016-  
AGIQOANIADILbARb.pdf'

Original File Name: INGAA Comments\_CARB Oil and Gas Methane Rule\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-18 15:42:47

No Duplicates.

**Comment 14 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Pamela

Last Name: Lacey

Email Address: placey@aga.org

Affiliation: American Gas Association

Subject: AGA Comments on Proposed GHG Emission Standards for Natural Gas Facilities  
Comment:

In the attached comment letter, the American Gas Association (AGA) supports the detailed comments of the Interstate Natural Gas Association of America (INGAA) on the Proposed Regulation Order Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-oilandgas2016-B2YHZIMzAAwEbgF1.pdf'

Original File Name: AGA Ltr to CARB Supporting INGAA Comments July 18 2016.pdf

Date and Time Comment Was Submitted: 2016-07-18 15:50:55

No Duplicates.

**Comment 15 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Julia

Last Name: May

Email Address: julia@cbeal.org

Affiliation: CBE

Subject: 17 EJ and Health Org's Urge Oil/Gas Strengthening

Comment:

Please see the attached comments of the following 17 Environmental Justice, Health, and Community Organizations:

CBE, CEJA, East Yard Communities for Environmental Justice, CRPE, CCAEJ, SoCal 350 Climate Action, South Bay Los Angeles 350 Climate Action Group, Wilmington Improvement Network, CFASE, California Kids IAQ, Community Dreams, Apostolic Faith Center, AMVETS Long Beach, EMERGE, Pacoima Beautiful, Esperanza Community Housing Corporation, and PSR-LA

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-oilandgas2016-BmNcMFcJAzNXPgRp.pdf'

Original File Name: EJ Comment CARB Oil Gas regulation July 18 2016.pdf

Date and Time Comment Was Submitted: 2016-07-18 16:17:53

No Duplicates.

**Comment 16 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on Proposed Regulation

Comment:

The Center for Biological Diversity strongly supports the goal of achieving substantial reductions in fugitive methane emissions from the oil and gas industry, and urges ARB to consider all options to eliminate methane emissions from the oil and gas sector entirely.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-oilandgas2016-WjlWNVE+AyRRMgh6.pdf'

Original File Name: Center for Biological Diversity comments on oil and gas methane rule 07 18 2016.pdf

Date and Time Comment Was Submitted: 2016-07-18 16:41:55

No Duplicates.

**Comment 17 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Jennifer

Last Name: Morris

Email Address: jhmmorris@semprautilities.com

Affiliation: SoCalGas

Subject: SoCalGas and SDG&E Comments on Proposed Regulation on Oil & Gas  
Comment:

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) appreciate the opportunity to submit these comments on the California Air Resources Board's (ARB) latest version of its Proposed Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities, released May 31, 2016 (Proposed Regulation).

Attachment: "https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-oilandgas2016-B3RUMVQyBQIRJFUx.pdf"

Original File Name: SCG\_SDGE Comments\_CARB\_OG 7-18-16 FINAL.pdf

Date and Time Comment Was Submitted: 2016-07-18 16:45:31

No Duplicates.

**Comment 18 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Steven

Last Name: Arita

Email Address: stevenarita@chevron.com

Affiliation:

Subject: Chevron U.S.A., Inc Comments on Oil & Gas Methane Regulation

Comment:

Chevron U.S.A. Inc. Comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-oilandgas2016-AWJdLVApVVkFaQdy.pdf'

Original File Name: CVX July 18 Methane Comment Letter - 71816.pdf

Date and Time Comment Was Submitted: 2016-07-18 16:47:06

No Duplicates.



**Comment 19 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Meleah

Last Name: Geertsma

Email Address: mgeertsma@nrdc.org

Affiliation: NRDC

Subject: Joint comments of CATF et al on proposed methane rules

Comment:

Please find attached comments of the Clean Air Task Force, Earthworks, Environmental Defense Fund, Natural Resources Defense Council, and Sierra Club. A disk of cited sources will be delivered by hand at the hearing on July 21.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-oilandgas2016-VjUCZQRxU2YFXAFk.pdf'

Original File Name: CATF et al CARB methane comments 7.18.2016.pdf

Date and Time Comment Was Submitted: 2016-07-18 16:00:46

No Duplicates.

**Comment 20 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Barbara

Last Name: McBride

Email Address: barbara.mcbride@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments on Proposed Regulation for Oil and Gas Facilities

Comment:

Please find attached the comments of Calpine Corporation on the California Air Resources Board's proposed Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities. Thank you for the opportunity to submit these comments. Please contact me if you should have any questions regarding these comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-oilandgas2016-AWJcO1c6AyALZAFv.pdf'

Original File Name: Calpine Comments on Proposed Oil & Gas Rule.pdf

Date and Time Comment Was Submitted: 2016-07-18 16:46:03

No Duplicates.

**Comment 21 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 45 Day.**

First Name: Milan

Last Name: Steube

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Regulation for “Greenhouse Gas Emission Standards for Crude  
Comment:

See Attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-oilandgas2016-  
VGYGMAMzB2ILIAYx.zip'

Original File Name: 2016-7-18 Comments on 5-31-16 proposed CARB CH4 Rule.zip

Date and Time Comment Was Submitted: 2016-07-19 10:30:31

No Duplicates.

**Comment 1 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Jonathan

Last Name: Mann

Email Address: Non-web submitted comment

Affiliation: 360-International Inc.

Subject: Proposed Reg for GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-oilandgas2016-V2ZUZFB8UTUELwQ2.pdf>

Original File Name: 16-7-2 Jonathan Mann.pdf

Date and Time Comment Was Submitted: 2016-07-22 09:20:29

No Duplicates.

**Comment 2 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Bruce

Last Name: Baizel

Email Address: Non-web submitted comment

Affiliation: Earthworks

Subject: GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-oilandgas2016-UGFVZVZ6BWFSQU3.pdf>

Original File Name: 16-7-2 Bruce Baizel.pdf

Date and Time Comment Was Submitted: 2016-07-22 09:20:29

No Duplicates.

**Comment 3 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: W. James

Last Name: Wagoner

Email Address: Non-web submitted comment

Affiliation: Butte County AQMD

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-oilandgas2016-VGUCMlxwWT0BKlJg.pdf>

Original File Name: 16-7-2 W James Wagoner.pdf

Date and Time Comment Was Submitted: 2016-07-22 09:20:29

No Duplicates.

**Comment 4 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Willie

Last Name: Rivera

Email Address: Non-web submitted comment

Affiliation: CIPA

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-oilandgas2016-U2JXZwQoA2dRegMx.pdf>

Original File Name: 16-7-2 Willie Rivera.pdf

Date and Time Comment Was Submitted: 2016-07-22 09:20:29

No Duplicates.

**Comment 5 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Jaclyn

Last Name: Schroeder

Email Address: Non-web submitted comment

Affiliation: Moms Clean Air Force

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-oilandgas2016-VWRWZIJ+VTEEL1dl.pdf>

Original File Name: 16-7-2 Jaclyn Schroeder.pdf

Date and Time Comment Was Submitted: 2016-07-22 09:20:29

No Duplicates.



**Comment 6 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Loni

Last Name: Russell

Email Address: Non-web submitted comment

Affiliation: Moms Clean Air Force

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-oilandgas2016-BzZUZFd7VTEFLINh.pdf>

Original File Name: 16-7-2 Loni Russell.pdf

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 7 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Jennifer

Last Name: Moeller

Email Address: Non-web submitted comment

Affiliation: Moms Clean Air Force

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-oilandgas2016-ATBUZFB8A2cGLQY0.pdf>

Original File Name: 16-7-2 Jennifer Moeller.pdf

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 8 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Jason

Last Name: Hector

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-oilandgas2016-VmddbVV5B2NQe1Bi.pdf>

Original File Name: 16-7-2 Jason Hector.pdf

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 9 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Elly

Last Name: Benson

Email Address: Non-web submitted comment

Affiliation: Sierra Club

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-oilandgas2016-AjNTY1d7VTFRegg6.zip>

Original File Name: 16-7-2 Elly Benson.zip

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 10 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Nathan

Last Name: Bengtsson

Email Address: Non-web submitted comment

Affiliation: PG&E

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-oilandgas2016-WmsFNQQoUTVXfFJg.pdf>

Original File Name: 16-7-2 Nathan Bengtsson.pdf

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 11 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Daisy

Last Name: Pisty-Lyhne

Email Address: Non-web submitted comment

Affiliation: PSE Health Energy

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-oilandgas2016-BTRVZVxwUzcDKAAy.pdf>

Original File Name: 16-7-2 Daisy Pitsty-Lyhne.pdf

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 12 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Elias

Last Name: Tobias

Email Address: Non-web submitted comment

Affiliation: EDF

Subject: Proposed Reg of GHG standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-oilandgas2016-BTRWZIF9AGRxfAc1.pdf>

Original File Name: 16-7-2 Elias Tobias.pdf

Date and Time Comment Was Submitted: 2016-07-22 11:31:55

No Duplicates.

**Comment 13 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Laura

Last Name: Yao

Email Address: Non-web submitted comment

Affiliation: Kairos Aerospace

Subject: Emissions in Oil and Gas Industry

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-oilandgas2016-VWQAMVZ6VjYLIAYw.pdf>

Original File Name: 17-3-6 Laura Yao.pdf

Date and Time Comment Was Submitted: 2017-03-28 16:26:50

No Duplicates.



**Comment 14 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Clifford

Last Name: Rechtschaffen

Email Address: Non-web submitted comment

Affiliation: PUC

Subject: Proposed Regulation for GHG emission standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-oilandgas2016-AjMGNwEtUDBQewYw.pdf>

Original File Name: 17-3-6 Clifford Rechtschaffen.pdf

Date and Time Comment Was Submitted: 2017-03-28 16:26:50

No Duplicates.

**Comment 15 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Bruce

Last Name: Baizel

Email Address: Non-web submitted comment

Affiliation: Earthworks

Subject: GHG Emission Standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-oilandgas2016-U2JTYgcrWDgAK1Bm.pdf>

Original File Name: 17-3-6 Bruce Baizel.pdf

Date and Time Comment Was Submitted: 2017-03-28 16:26:50

No Duplicates.

**Comment 16 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016). (At Hearing)**

First Name: Jenifer

Last Name: Pitcher

Email Address: Non-web submitted comment

Affiliation: WSPA

Subject: GHG Emission Standards for Oil & Gas

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-oilandgas2016-BzYAMQQoWTkDKAA2.pdf>

Original File Name: 17-3-6 Jenifer Pitcher.pdf

Date and Time Comment Was Submitted: 2017-03-28 16:26:50

No Duplicates.

## **Comment 1 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 15-1.**

First Name: Jim  
Last Name: Clarke  
Email Address: jesse.mays@culvercity.org  
Affiliation: City of Culver City

Subject: Revised Draft Regulation for Greenhouse Gas Emission Standards  
Comment:

February 17, 2017

Elizabeth Scheehle  
Branch Chief, Oil and Gas and GHG Mitigation Branch  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA, 95814

Subject: Revised Draft Regulation for Greenhouse Gas Emission  
Standards for Crude Oil and Natural Gas Facilities

Dear Ms. Scheehle:

The City of Culver City supports reasonable environmental regulations aimed at enhancing air quality. We seek to improve air quality in Culver City and the surrounding areas, and we want to ensure that air quality and public health are protected during oil and gas drilling. As such, the City of Culver City strongly supports the proposed rule to regulate greenhouse gas emissions from oil and gas facilities in California. We would like to thank the California Air Resources Board staff for being a national leader in promoting clean air. We especially value the provisions that:

- Require a quarterly baseline inspection requirement (without a step-down).
- Specify the use of continuous ambient air quality monitoring along the fencelines of natural gas storage facilities.
- Prioritize natural gas capture over combustion requirements.

These policies will result in the detection of more leaks, better maintenance, cleaner air, and improved public health.

We urge you to hasten the timeframe for adopting and implementing the rule. In this draft, implementation is delayed at least a year from when it was initially proposed. Clean air cannot wait. We also urge you to create a detailed plan for the CARB and local air pollution districts to implement the new regulations, including periodic audits of newly regulated facilities. With these improvements, CARB will ensure California remains a world leader in the protection of clean air and the reduction of greenhouse gas emissions.

If you have any questions, or wish to discuss this further, please contact Jesse Mays, Assistant to the City Manager, at (310)

253-6009.

Sincerely,

Jim B. Clarke  
Mayor

cc: The Honorable Members of the City Council  
John M. Nachbar, City Manager

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-oilandgas2016-BTQBMAMyWDkLPFdg.pdf>

Original File Name: 170217 Culver City Emission Standards Letter.pdf

Date and Time Comment Was Submitted: 2017-02-17 13:25:47

No Duplicates.

**Comment 2 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Steve

Last Name: Deiker

Email Address: [steve@kairosaerospace.com](mailto:steve@kairosaerospace.com)

Affiliation: Kairos Aerospace

Subject: Kairos Aerospace comment on proposed oil and gas regulation

Comment:

Thank you for the opportunity to comment on the proposed regulation for GHG emission standards for crude oil and natural gas facilities. Please see attached document for full comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-oilandgas2016-AGtSNVM7AyIHbgNw.pdf>

Original File Name: Kairos Comments on ARB Reg.pdf

Date and Time Comment Was Submitted: 2017-02-20 14:36:03

No Duplicates.

**Comment 3 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Rock

Last Name: Zierman

Email Address: Rock@cipa.org

Affiliation: CIPA

Subject: CIPA Oil/Gas Methane Rule Comments

Comment:

See attached CIPA comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-oilandgas2016-VjVWOVUkWWsDWghl.pdf>

Original File Name: CIPA Methane Rule 15-day Comments - 2-21-17-final.pdf

Date and Time Comment Was Submitted: 2017-02-21 06:50:37

No Duplicates.

**Comment 4 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Elizabeth

Last Name: Paranhos

Email Address: elizabethparanhos@delonelaw.com

Affiliation:

Subject: EDF comments on oil and gas modifications

Comment:

Please accept the attached comments on the modifications to the oil  
and gas proposal.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-oilandgas2016-AWJcOwZ1U2IEXVMw.zip>

Original File Name: CARB comments.zip

Date and Time Comment Was Submitted: 2017-02-21 12:26:23

No Duplicates.



## **Comment 5 for Crude Oil and Natural Gas Facilities Regulation (oilandgas2016) - 15-1.**

First Name: Concerned California

Last Name: 5,482

Email Address: iburga@edf.org

Affiliation:

Subject: 5,482 Concerned Californians Support Strong Methane Regulations

Comment:

Please see the attached PDF with sign-ons to the below letter from 5,482 Californians supporting strong methane oil and gas regulations.

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Thank you for releasing a strong, final draft of methane regulations. I'm writing today to urge you to continue this crucial leadership by finalizing the strongest methane rules for oil and gas production in the country.

Smart policies that reduce methane and other harmful oil and gas pollutants are exactly what California needs. Once finalized and fully implemented, these standards will require oil and gas companies to find and fix leaky equipment. In doing so, they will not only help position California as a leader on climate change during a critical time for our country, they will also help improve health outcomes for Californians, especially those with asthma. And they will unleash new business opportunities across the state in leak detection and repair.

This is the right step for California, and for the country as a whole. Please finalize these standards as soon as possible.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-oilandgas2016-B2FRPgZpBzVWPFAP.pdf>

Original File Name: FINAL CARB OG Rule Outreach Letter.pdf

Date and Time Comment Was Submitted: 2017-02-21 12:35:18

No Duplicates.

**Comment 6 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: ELIAS  
Last Name: TOBIAS  
Email Address: elias.tobias@safetyscan.org  
Affiliation:

Subject: CARB Oil & Gas Methane Rulemaking - Available Technologies for Monitoring  
Methane FugieAve  
Comment:

Monday, February 20, 2017  
Elizabeth Scheehle, Branch Chief, Oil and Gas and GHG Mitigation  
Branch  
California Air Resources Board  
1001 "I" St., Sacramento, CA, 95814

Via Electronic Submittal:  
[https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm\\_p  
eriod=1](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm_period=1)

Ref.: CARB Oil & Gas Methane Rulemaking - Available  
Technologies for Monitoring Methane Fugitive Emissions

Dear Elizabeth,  
Since we last had contact for my testimony at the CARB hearing in  
Sacramento on July 2016 very exciting new technologies for products  
and services became commercially available in the US at a very  
affordable price points !  
Safety Scan as a solution provider for the industry is proud to  
announce that we became authorized reseller and authorized field  
service provider for such new technologies that the industry  
already is showing clear signs that they will adopt:

>>>> Please find attached my full letter in PDF format <<<<

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-oilandgas2016-  
BzUHMVJiBGAKIQIy.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-oilandgas2016-BzUHMVJiBGAKIQIy.pdf)

Original File Name: 2017-02-20 LETTER FOR CARB METHANE RULEMAKING to  
Elizabeth Scheehle.pdf

Date and Time Comment Was Submitted: 2017-02-21 13:59:23

No Duplicates.

**Comment 7 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: W. James

Last Name: Wagoner

Email Address: [jwagoner@bcaqmd.org](mailto:jwagoner@bcaqmd.org)

Affiliation: Butte County AQMD

Subject: Comments on Proposed 15-Day Modifications Oil and Gas Regulation  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-oilandgas2016-USFSJlwyUXICa1Um.pdf>

Original File Name: Proposed 15-Day Modifications Comments BCAQMD.pdf

Date and Time Comment Was Submitted: 2017-02-21 15:07:42

No Duplicates.

**Comment 8 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Ann

Last Name: Trowbridge

Email Address: atrowbridge@daycartermurphy.com

Affiliation: Day Carter & Murphy LLP

Subject: ISP Comments Re 15-Day Modifications, GHG Emission Standards for Crude Oil and Natural Gas

Comment:

Central Valley Gas Storage, LLC, Gill Ranch Storage, LLC, Lodi Gas Storage, L.L.C., and Wild Goose Storage, LLC appreciate the opportunity to submit the attached comments regarding Proposed 15-Day Modifications to Proposed Regulation-Subarticle 3: Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-oilandgas2016-WjNWIIQIV1tVMAJt.pdf>

Original File Name: ISP Comments Re Draft 15-Day Changes, GHG Emission Standards for Crude Oil and Natural Gas Facilities.pdf

Date and Time Comment Was Submitted: 2017-02-21 15:09:57

No Duplicates.

**Comment 9 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Jennifer

Last Name: Morris

Email Address: jhmmorris@semprautilities.com

Affiliation: SoCalGas

Subject: SoCalGas and SDG&E Comments on the Proposed Modifications to the Oil & Gas Rule  
Comment:

Please find attached SoCalGas and SDG&E Comments on the Greenhouse  
Gas Emission Standards for Crude Oil and Natural Gas Facilities  
Proposed 15-Day Modifications.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-oilandgas2016-BXYGY1UzV1sGcwFl.pdf>

Original File Name: SCG\_SDGE Comments on 15-day 2-21-17\_FINAL.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:08:35

No Duplicates.

**Comment 10 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Irene

Last Name: Burga

Email Address: iburga@edf.org

Affiliation: EDF

Subject: 32 environmental justice, health & public interest institutions support strong O&G rules  
Comment:

Please accept the attached letter on behalf of 32 environmental justice, public health, and public interest institutions representing millions of Americans in support of the proposed rule to regulate greenhouse gas emissions from oil and gas facilities in California.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-oilandgas2016-VTZUM1AjAjNWD1Q7.pdf>

Original File Name: CARB OG Rule Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-02-21 15:40:47

No Duplicates.

**Comment 11 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation:

Subject: Methane rule  
Comment:

WSPA COMMENT LETTER

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-oilandgas2016-VDVWJAB1V2VXMgJq.pdf>

Original File Name: Attachment A\_ARB Methane Rule 15-Day Comments\_2-17-17\_FINAL\_.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:51:36

No Duplicates.

**Comment 12 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation:

Subject: Methane rule  
Comment:

WSPA COMMENT LETTER

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-oilandgas2016-AXZRJFEgAzEAWVU0.pdf>

Original File Name: WSPA ARB Methane Rule 15-Day Comments Cover  
Letter\_2\_17\_17\_FINAL\_(2).pdf

Date and Time Comment Was Submitted: 2017-02-21 16:51:36

No Duplicates.



**Comment 13 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation:

Subject: Methane rule  
Comment:

WSPA COMMENT LETTER

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-oilandgas2016-WjtcLgdyU2EKbwZu.pdf>

Original File Name: Attachment B - Circulation Tanks Safety Expert Opinion\_2-17-17.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:51:36

No Duplicates.

**Comment 14 for Crude Oil and Natural Gas Facilities Regulation  
(oilandgas2016) - 15-1.**

First Name: Fariya

Last Name: Ali

Email Address: fxao@pge.com

Affiliation: PG&E

Subject: PG&E Comments on Oil & Gas Regulation 15-day Changes

Comment:

See attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-oilandgas2016-VDsHaARpB3kGZ1Q1.pdf>

Original File Name: Oil-Gas Reg\_PGE Comments.pdf

Date and Time Comment Was Submitted: 2017-02-21 16:23:10

No Duplicates.