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Quinn Langfitt  
Air Resources Engineer  
California Air Resources Board  
1001 "I" Street  
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**RE: Pacific Gas and Electric Company Comments on the California Air Resources Board's Potential Changes to the California Oil and Gas Methane Regulation**

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment on the California Air Resources Board's (CARB) *Public Workshop on Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text* (Workshop) held on January 20, 2023. PG&E would like to thank CARB for its continued efforts to reduce methane emissions from the oil and natural gas industry.

PG&E's comments in this letter include clarifying questions on some of the proposed changes presented at the Workshop, recommendations to improve the regulatory language of future amendments, and responses to requested feedback questions for remote sensing. The provisions referenced below are listed in chronological order from the *Draft Regulatory Text* and conclude with PG&E feedback to questions posed during the workshop.

**1 -- § 95668. Standards**

*(h) Natural Gas Underground Storage Facility Monitoring Requirements*

The draft regulatory text proposed in § 95668 (h)(4)(A)(10) requires the facility owner/operator of an Underground Gas Storage Facility to notify CARB within 24 hours of an air monitoring system going offline, including the reason(s) and justification, followed by an additional notification when the system is online again. PG&E seeks additional clarification on which situations these notifications would be required under— specifically, in regard to unanticipated outages. For example, there have been instances of unanticipated outages of the remote connection to the ambient air monitoring system in which the system would no longer auto-notify of an ambient air exceedance (due to a lost connection), but no data was lost, and the ambient air monitors were still functioning. In such instances, PG&E

performs a manual check on the data to ensure that the downwind sensor did not detect a reading greater than or equal to four times the baseline, and that no alarms are triggered.<sup>1</sup>

PG&E requests that CARB provide a clear definition of “offline” under § 95667. **Definitions** and further clarify the meaning of “offline” as it relates to air monitoring systems and unanticipated outages. Additionally, it would be helpful, if not prudent, to specify “offline” in terms of triggering a notification under § 95668 (h)(4)(A)(10) and including a duration (e.g., 24-hours) if applicable.

## 2 -- § 95669. Leak Detection and Repair

Proposed revision § 95669 (d)(1) requires all owners/operators to develop facility-specific Leak Detection and Repair (LDAR) plans that must be subsequently updated within 30 calendar days of any facility or equipment changes which alter the LDAR plan, and that include a list of equipment/components designated inaccessible or unsafe to monitor and reasons why.<sup>2</sup> PG&E requests additional guidance from CARB on the required LDAR plan updates— in particular, for equipment and components that are *temporarily* designated inaccessible or unsafe due to active project work.

In instances of temporary inaccessible/unsafe designation, should the LDAR plan be updated to list temporarily inaccessible/unsafe equipment/components and then be updated once more to subsequently remove said equipment/components once project work in a given area has been completed? To avoid confusion and frequent revisions to LDAR plans, PG&E recommends that the requirement to update LDAR plans not be triggered by temporary changes to the designation of equipment/components as inaccessible/unsafe.

Proposed revision § 95669 (g) requires all components to be tested via Method 21 once per quarter, with the exception of inaccessible/unsafe equipment and components as stipulated in § 95669 (g)(2), which are to be inspected annually. Per § 95669 (g)(2)(A), owner/operators must also maintain a list of equipment designated as inaccessible/unsafe as required by § 95669 (d)(1)(E).

Based on previous communications with CARB, approval has been granted to not conduct surveys on equipment that is temporarily inaccessible or unsafe as a result of maintenance and/or project work, so long as the operator documents the area(s) not surveyed, date(s), reasons for justification, and additionally reports this information to CARB via a quarterly/annual report or notification. In line with this guidance, PG&E recommends that CARB require annual submittal of equipment and/or components temporarily designated as inaccessible or unsafe due to maintenance and/or project work in lieu of requiring the entire LDAR plan to be updated. Information on temporarily inaccessible/unsafe components should be included in annual reports and supporting documentation made available upon CARB’s request.

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<sup>1</sup> In accordance with § 95668 (h)(4)(A)(7) and (8) such that a notification can be provided to CARB for an exceedance, as necessary.

<sup>2</sup> Draft Potential Changes § 95669 (d)(1)(E).

### 3 -- § 95670.1 Delay of Repair

Proposed revision § 95670.1 (a) states that an owner/operator may request a Delay of Repair (DOR) provided that CARB is notified of the DOR before the repair timeframe has lapsed. In conjunction, proposed revision § 95670.1 (a)(1) states that CARB shall grant or deny a DOR request within five days of receipt. If a DOR request is submitted on the day of the repair deadline and CARB subsequently denies the request within the allotted five days of receipt (thus, five days after the repair deadline), would this qualify as an owner/operator violation? PG&E recommends that CARB include a provision that maintains owner/operator compliance with repair timeframes and accounts for the possible timing overlap during CARB's deliberation on a DOR request.

Proposed revision § 95670.1 (a)(4)(A) outlines notification requirements for a DOR due to a parts delay. Where § 95670.1 (a) requires the DOR request be submitted before the repair timeframe is exceeded, § 95670.1 (a)(4)(A) requires that a parts delay request include an order confirmation and estimated shipment/arrival dates. PG&E requests additional clarification and guidance for cases in which specialty parts and/or out-of-production-and-not-readily-available parts require a custom made-to-order part. Currently, there are several examples of old components that are no longer manufactured and are on an extended delay of repair due to a lack of available parts. In these instances, what are the notification requirements in terms of both timeframes and details to be included in a DOR request? Additionally, how will CARB evaluate these and what form of documentation is needed to provide proof of repair effort (e.g., email correspondence with a manufacturer)?

### 4 -- Feedback Requested: Remote Sensing Provision

*What types of remote sensing technology should be included?*

- Satellites and aerial are a desirable choice for remote sensing technologies because they are capable of detecting large emissions that require immediate attention. As part of the regulation, please also consider scan time frequency.

*What requirements should be included for eligibility of data sources?*

- PG&E recommends that multiple detections be a criterion for eligibility of data sources.

*What information should be provided to operators in notifications?*

- § 95669.1 (b)(1) states that a notification will be provided to owners/operators of the location of a remotely detected emission with a latitude/longitude coordinate and precision of four (4) decimals of a degree. To facilitate expeditious identification of remotely detected emission leaks, PG&E suggests that notifications report the latitude-longitude coordinates of the emission location with a precision of five (5) decimals of a degree.

- PG&E suggests that notifications to owners/operators include an estimated concentration or emissions flowrate measurement, as well as wind direction and speed at the time of measurement to facilitate owners/operators in locating and addressing the origin of emission.
- PG&E requests a preliminary notification to owners/operators prior to conducting a remote leak detection survey in order to ensure that appropriately trained personnel with necessary equipment can be available to conduct the follow-up investigation. Moreover, there are safety considerations with an aircraft flying over a facility that is performing a controlled release or blowdown, and these considerations could be better managed and implemented with a preliminary notification.

PG&E appreciates the opportunity to provide these comments on the Workshop and looks forward to continued collaboration with CARB staff on the forthcoming amendments. Please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

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State Agency Relations Representative, Expert  
Pacific Gas and Electric Company