



September 6, 2016

**VIA EMAIL**

U.S. Environmental Protection Agency  
Ms. Brenda Shine  
Sector Policies and Programs Division, Refining and Chemicals Group  
Mailcode E143-01  
109 T.W. Alexander Drive  
Research Triangle Park, NC 27709

**Re: Follow-up from ICR Meeting on August 25, 2016**

**Dear Ms. Shine:**

During the August 25, 2016 meeting between the GPA Midstream Association ("GPA Midstream") and the Environmental Protection Agency ("EPA") regarding GPA Midstream's comments on the Proposed Information Collection Effort for Oil and Gas Facilities ("ICR"), EPA mentioned it is currently considering a few options on how to select gathering compressor stations for the Part 2 survey and requested GPA Method 2103-03 which was included in our August 2, 2016 comment letter.

**Part 2 Survey Facility Selection Process**

EPA presented GPA Midstream with a process to select gathering compressor facilities using the parent companies of natural gas processing plants during our meeting on August 25, 2016. GPA Midstream is concerned that a gathering facility selection process based solely on natural gas processing plant parent companies may skew the data set towards larger, higher emitting facilities since not all natural gas is processed in a plant before reaching its end-user. It would also miss a significant percentage of compressor stations operated by production companies that are not co-located on a well pad and compressor stations operated by companies that do not operate processing plants.

Therefore, GPA Midstream would like to provide EPA with two options on how to select gathering compressor facilities for the Part 2 survey. Option 1 below is GPA Midstream's preferred option. For either option EPA should define compressor station as it is in NSPS Subpart OOOOa (40 CFR §60.5430a), modified slightly for the gathering segment only:

*Gathering compressor station* means any permanent combination of one or more compressors that move natural gas at increased pressure through gathering pipelines. The combination of one or more compressors located at a well site, or located at an onshore

natural gas processing plant, is not a gathering compressor station for purposes of this ICR.

GPA Midstream previously submitted comments on the proposed definition in the ICR for *natural gas processing plant*.

#### Option 1: Two Step EPA Selection Process

In order to ensure that a statistically meaningful group of gathering facilities is selected and to minimize any sampling bias, EPA should require all gathering compressor stations to submit a Part 1 survey. To provide notice, EPA would publish in the Federal Register, post online, and provide a news release that all gathering compressor stations must complete the Part 1 survey. In addition, EPA could submit the request to all of the highest level parent companies of natural gas processing plants and natural gas well production facilities that have submitted greenhouse gas reports under 40 CFR 98, Subpart W. After EPA receives the list of gathering compressor stations, the agency then performs a random selection for the Part 2 survey. Part 2 surveys are then sent to the selected facilities from EPA. GPA Midstream believes this option ensures a truly random selection of facilities without any selection bias.

#### Option 2: Company Selection Process

If Option 1 is not acceptable to the agency, EPA could require each natural gas processing plant highest level parent company to select a certain percentage of its gathering compressor facilities using a random number generator imbedded in an EPA provided spreadsheet. Those randomly selected facilities from each company would then have to fill out a Part 2 survey. As stated in above in Option 1, the natural gas well production facilities should be required to randomly select from the gathering compression facilities that they operate as well. GPA Midstream believes sending the request to both natural gas production and natural gas processing parent companies will capture the majority of gathering and boosting segment; however, it should be noted again that companies that do not own processing plants or production facilities will not be captured in the ICR. It is unknown whether excluding these facilities will skew the results of the data collection.

#### **GPA Method 2103**

During the meeting on August 25, 2016, EPA staff requested a copy of GPA Method 2103 which was referenced in GPA Midstream's comments on the ICR proposal submitted August 2, 2016. As stated in our comment letter, GPA Midstream still believes EPA would be able to gather adequate emission information by requesting engineering models based on representative liquid analyses from the basin. As discussed during the meeting, GPA Midstream is also concerned a requirement for individual pressurized liquid samples, at each selected facility, may cause significant delays in responding to the ICR due to the number of samples that would need to be collected and analyzed during a relatively short period of time. The laboratories may not only be overwhelmed with the number of samples that need to be run, but may also be

limited on the number of pressurized sampling canisters and the staff needed to pull the samples. Typically the laboratories have their own employees or contractors pull the pressurized liquid samples. If EPA decides to require sampling for each facility selected for the Part 2 survey, GPA Midstream believes that GPA Method 2174 should be used to pull the pressurized liquid sample and GPA Method 2103 should be used to analyze the hydrocarbon stream. These methods are both familiar to our industry and provide accurate results. A copy of GPA Method 2103 is attached to this letter for your review.

Thank you for your consideration on these matters. Please contact us with any further questions.

Respectfully Submitted,



Matthew Hite  
Vice President of Government Affairs  
GPA Midstream Association