



February 4, 2016

**VIA ELECTRONIC FILING**

Environmental Protection Agency  
MC-6207A  
Attention Docket ID No. EPA-HQ-OAR-2015-0764  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Request for Extension to Public Comment Period Docket ID No. EPA-HQ-OAR-2015-0764; Proposed Rule for Greenhouse Gas Reporting Rule: Leak Detection Methodology Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems; Federal Register Vol. 81, No. 19 (Friday, January 29, 2016); RIN 2060-AS73**

Dear Sir/Madam:

The Gas Processors Association (GPA) respectfully requests an extension to the comment period for the proposed rule for “Greenhouse Gas reporting Rule: Leak Detection Methodology Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems” published in the Federal Register on January 29, 2016 (81 FR 4987). GPA is requesting the comment period be extended **60-days** beyond the February 29th, 2016 comment period deadline.

GPA has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA 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 members account for more than 90 percent of the NGLs produced in the United States from natural gas processing.

The proposed rule directly affects onshore activities in SIC Major Group 13. Most midstream natural gas operations are covered under SIC 1311 or 1321. As such, the proposed rule would have significant impact to the GPA membership which owns and operates field gas gathering and processing sources that would be affected by this proposed rule amendment.

Many of the same personnel that are working to evaluate this proposed rule are also working to implement the Subpart W Gathering and Boosting Rule as well as file the annual GHG reports due on March 31, 2016. As proposed, this rule will have both financial and resource impact on our members. GPA members possess significant information that is relevant to the proposed rule and additional time is necessary in order to thoughtfully assess, compile, and provide such

information to the EPA so that the EPA may consider such information as it works towards finalizing this rule. It is only reasonable to allow an additional 60 days for this rule proposal to allow sufficient time to thoroughly review the proposal, fully understand its impacts, and develop thoughtful comments and recommendations. A 60 day extension will also ensure that GPA members have adequate time to review the rule and develop comments after the annual reporting deadline.

GPA 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 60 days and look forward to working with the agency on the final rule. If you have questions please contact me at (202) 279-1664 or by email at [mwhite@gpaglobal.org](mailto:mwhite@gpaglobal.org) or Melanie Roberts, GPA Environmental Committee Chair, at (713) 584-1422 or by email at [mroberts@targaresources.com](mailto:mroberts@targaresources.com).

Sincerely,

Matthew Hite  
Vice President of Government Affairs  
Gas Processors Association

cc: Ms. Carole Cook, U.S. EPA