



MIDSTREAM'S GREATEST RESOURCE

October 7, 2015

VIA ELECTRONIC FILING

Environmental Protection Agency
EPA Docket Center
Mailcode 2821T
Attention Docket ID No. EPA-HQ-OAR-2013-0685
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Extension to Public Comment Period Docket ID No. EPA-HQ-OAR-2013-0685; Proposed Rule for Source Determination for Certain Emission Units in the Oil and Natural Gas Sector; Federal Register Vol. 80, No. 181 (Friday, September 18, 2015); RIN 2060-AS06

Dear Sir/Madam:

The Gas Processors Association (GPA) respectfully requests an extension to the comment period for the proposed "Source Determination for Certain Emissions Units in the Oil and Natural Gas Sector" published in the Federal Register on September 18, 2015 (80 FR 56579). GPA is requesting the comment period be extended **60-days** beyond the November 17th, 2015 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 definition change. In addition, this regulation is just one of four regulations EPA proposed simultaneously as part of the President's "Climate Action Plan" to reduce methane emissions from the oil and natural gas industry. Each of these proposed rules needs to be adequately reviewed to understand the full impacts of each rule as well as the collective impacts of these new regulations.

Many of the same personnel that are working to evaluate this proposed rule are also evaluating EPA's other proposed rules. As proposed, this rule will have significant financial and resource

impact on our members. GPA members possess significant information that is relevant to the proposed rules 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 these rules. It is only reasonable to allow an additional 60 days to each of these rule proposals to allow sufficient time to thoroughly review the proposal, fully understand its impacts, and develop thoughtful comments and recommendations.

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 or Melanie Roberts, GPA Environmental Committee Chair, at (713) 584-1422 or by email at mroberts@targaresources.com.

Sincerely,

Matthew Hite
Vice President of Government Affairs
Gas Processors Association

cc: Ms. Cheryl Vetter, U.S. EPA

