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Joe Fischer
Project Lead
Oil & Gas Regulation
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Draft Greenhouse Gas Emission Regulations

Dear Mr. Fischer:

I wonder about section 95213(a)(1)(C) of the draft regulations. The standard cited there is that the “*annual emission rate has not changed using three (3) consecutive years of test results*”. It seems impossible for a measurement to be the same each time.

There must be some variation in the results from year to year. Among other things, the sample taken is rather small and it is being projected over a year of production which is subject to variation in volume and gravity. This especially the case in mature properties where we would expect the production (and gas) volume to decline each year.

I suppose the main objective under the section is to determine whether or not the emissions continue to be less than 10 tons a year of methane. Below that figure, variations within a range (up or down) ought to be permitted under the rule as still complying with this intent.

If you have any questions, please give me a call.

Sincerely,

Mark A. Smith
Manager