

# Comment 1 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.

First Name: Nicole

Last Name: Collazo

Email Address: nicole@vcapcd.org

Affiliation:

Subject: VCAPCD Comments for Oil and Gas Methane Regulation – Draft Regulatory Text

Comment:

Good afternoon,

Thank you for the opportunity to review and comment on the draft regulatory text for proposed changes to the O&G Methane Regulation. On behalf of the Ventura County Air Pollution Control District and Officer, we submit the following comments.

## § 95667. Definitions:

Comment: Definition #27, page 6: Staff believes the reference to section 95667 (a)(72) should be revised to Section 95667 (a)(71). Also, staff believes adding the word "properly" insinuates that the well has been abandoned or close to abandonment. Some wells can be idle for months to years without any plans to abandon. This might create unnecessary scrutiny of idle wells or confusion. It may be better to add a definition of "abandoned well" or "properly abandoned well" to clarify or change the definition to. For example: "Idle well" means a well, as defined in section 95667(a)(71), that is not actively producing oil or gas but is not planned to be abandoned in accordance with Public Resources Code Section 3208." Or use the same definition for idle well listed in Public Resources Code Section 3008 "Idle well" means any well that has not produced oil or natural gas or has not been used for injection for six consecutive months of continuous operation during the last five or more years. An idle well does not include an active observation well" Staff recommends for consistency across regulators, it is contingent on the usage of the well, not its abandonment status.

Comment: Definition # 34, page 6: The word "fence line", could be interpreted literally. What if a lease does not have a "fence"? Are they then exempt from the requirements pertaining to "Natural gas gathering and boosting stations"? May be better to exclude "fence line" altogether from this definition.

Comment: Definition #36: Same as # 34

Comment: Definition #64, page 9: It states "during normal operation": Does this mean a sump used for emergency purposes not during operational hours is not considered a sump? Is there another definition for emergency sump?

Comment: Definition # 72, page 11: Does "above the earth's surface" include the space inside a well's cellar?

## § 95669. Leak Detection and Repair.

Comment: Paragraph (g)(1)(B), page 45: We recommend adding Local Air District representative to CARB Executive Officer inspection". The same for 95669(o)(1)(A) and 95669(o)(1)(B). For example, we could state "...during a CARB Executive Officer or Local Air District representative inspection...".

Comment: App. (c)(4), page 121, Is this a correct email address "Oil\_and\_Gas\_PT@EPA.gov"?

Appendix F

Comment: App. F (b)(1)(A)(B) Test Methods, page 130: Requires sample locations at both inlet and outlet of flare. Staff believes most of the oil and gas flares are of the candlestick design. They do not have an exhaust stack and corresponding outlet sample locations. Many may not have inlet gas stream sample locations. If there are inlet sample ports, they may not meet the Method 1 requirements.

Comment: App. F (b)(2), page 130 States Methods 2, 2A, 2C or 2D shall be utilized for gas flowrate. Staff believes the outlet gas stream flow of most flares does not meet the minimum velocity fpm or delta P of 0.05 required by Method 2 to accurately quantify gas flow. We do not believe Method 2A, 2C or 2D would be applicable. Staff would recommend EPA Method 19 and exhaust O2 measurements combined with stoichiometric exhaust flow calculation to accurately quantify exhaust flow.

Comment: App. F (b)(3), page 130 Dictates Method 25A (FID, flame ionization detector) be utilized for inlet/outlet ROC concentration determination. Inlet concentrations including CH4 may be very high for Method 25A quantification (% as opposed to ppm) which often cause flame outs in the FID analyzer. Staff would recommend an alternate methodology. The flare ROC outlet concentrations are often

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-24 14:06:36

No Duplicates.

**Comment 2 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.**

First Name: Laura

Last Name: Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation: Fresnans Against Fracking, CEJC, Sierra

Subject: CA oil and gas Methane Regulation &AB 32

Comment:

Don't exempt heavy crude oil from the Methane Regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-01-26 15:04:06

No Duplicates.

**Comment 3 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.**

First Name: Rock  
Last Name: Zierman  
Email Address: rock@cipa.org  
Affiliation: CIPA

Subject: CIPA Comments  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-og-wkshp-jan23-ws-UjFdMIAhUGIHXgJv.pdf>

Original File Name: CIPA Methane Comments 2-10-22 final.pdf

Date and Time Comment Was Submitted: 2023-02-10 07:34:59

No Duplicates.

**Comment 4 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Applegate

Email Address: michelle.applegate@projectcanary.com

Affiliation:

Subject: Project Canary Comments Regarding GHG Emissions Standards

Comment:

Hello,

Project Canary submits the attached comments pursuant to the Public Workshop on Potential Changes to the California Oil and Gas Methane Regulation.

Best,

Michelle Applegate

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-og-wkshp-jan23-ws-BnZTJ1U7V24CYQBj.pdf>

Original File Name: Project Canary Comments GHG Emission Standards 02.10.23.pdf

Date and Time Comment Was Submitted: 2023-02-10 14:28:28

No Duplicates.

**Comment 5 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Privett

Email Address: jennifer.privett@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: Comments on Potential Changes to Oil & Gas Methane Rule

Comment:

Please see attached for PG&E comments on Potential Changes to the Methane Regulation. Let me know if you have any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-og-wkshp-jan23-ws-W2lXfwQ0UjEFLQk7.pdf>

Original File Name: 2.10.23 PG&E Comments on Potential Changes to Oil and Gas Methane Rule\_FINAL.pdf

Date and Time Comment Was Submitted: 2023-02-10 16:08:15

No Duplicates.

**Comment 6 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.**

First Name: Jessi  
Last Name: Davis  
Email Address: jdavis6@socalgas.com  
Affiliation: SoCalGas

Subject: SoCalGas Comments on CARB's Potential Changes to the Oil and Gas Methane Reg.  
Comment:

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-og-wkshp-jan23-ws-BnVVPFMxVGZSOANK.pdf>

Original File Name: SoCalGas Comments on CARB's Second Public Workshop to Discuss Potential Changes to the Oil and Gas Methane Regulation.pdf

Date and Time Comment Was Submitted: 2023-02-10 16:19:50

No Duplicates.

**Comment 7 for Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) - 1st Workshop.**

First Name: Christine  
Last Name: Zimmerman  
Email Address: czimmerman@wspa.org  
Affiliation: WSPA

Subject: subject of comment  
Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-og-wkshp-jan23-ws-VyBTJlAhBzVRCFQ3.pdf>

Original File Name: WSPA\_CMT\_COGR METHANE\_2\_10\_2023\_FINAL.pdf

Date and Time Comment Was Submitted: 2023-02-13 16:22:40

No Duplicates.

**There are no comments posted to Public Workshop: Potential Changes to the California Oil and Gas Methane Regulation – Draft Regulatory Text (og-wkshp-jan23-ws) that were presented during the Workshop at this time.**