

October 11, 2022

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 California Air Resources Board
 1001 “I” Street
 Sacramento, CA 95814

RE: Pacific Gas and Electric Comments on the September 20, 2022 Oil and Gas Methane Regulation Public Workshop

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment on the California Air Resources Board (CARB)’s September 20, 2022 public workshop on potential changes to the Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities (Oil and Gas Rule). PG&E’s comments in this letter include an overview of our implementation progress, questions on some of the proposed changes from the workshop, and additional recommendations for future amendments to improve the regulation.

A. PG&E continues to support the State’s greenhouse gas emissions reduction targets by reducing methane leaks from our natural gas transmission compressor stations and underground gas storage fields (UGSF). Since implementation of the Oil and Gas Rule began, PG&E has seen a year-over-year (YOY) reduction in leaks above the designated thresholds from both the quarterly leak detection and repair (LDAR) surveys and the daily wellhead leak screenings. As demonstrated in the tables below, PG&E had a 64.3% reduction in quarterly LDAR survey leaks between reporting years 2018 and 2019 and a 34.1% reduction from 2020 to 2021 after the leak threshold decreased to include leaks above 1,000 parts per million by volume (ppmv) total hydrocarbons. From the onset of daily wellhead leak surveys in 2019 until 2021, PG&E identified 83.2% fewer leaks.

Table 1

YOY Leaks Identified – Quarterly LDAR Leak Survey				
	2018	2019	2020	2021
All Compressor Stations and UGSF Facility Totals	<i>Leak Threshold of >10,000 ppmv (January 1, 2018 - December 31, 2019)</i>		<i>Leak Threshold of >1,000 ppmv (On or After January 1, 2020)</i>	
	2161	772	1945	1282

Table 2

YOY Leaks Identified - Daily Wellhead Leak Screening			
	2019	2020	2021
McDonald Island UGSF	146	38	7
Pleasant Creek UGSF	13	46	18
Los Medanos UGSF	8	36	3
Facility Totals	167	120	28

B. PG&E appreciates staff’s presentation at the September workshop to provide stakeholders a preview of potential changes to the regulation. Staff has proposed requiring action from operators for methane leaks that are identified by satellites or other remote monitoring technology. PG&E requests additional information from staff in response to the following questions:

- What would be the public availability of the satellite or other remote monitoring data? Would operators be able to view the data?
- What would be the quality assurance (QA) process CARB would undertake to review the data before requiring action? For example, what is the accuracy of the measurements taken by such technologies?
- Additional detail on potential actions that would be required from operators:
 - Timeframe for inspections after notification of a leak by CARB
 - What response would be required if no leak or a leak below current reporting thresholds is found? Would the same thresholds currently in the regulation be applicable?
 - Timeframe for leak repairs:
 - Would repair timeframes be the same as those in the current regulation?

C. In addition to the changes proposed by staff, PG&E also recommends that CARB consider including the following amendments to the regulation to improve implementation:

1. Add to the regulation the guidance that has been previously provided to operators on a one-on-one basis to ensure consistency and transparency across facilities and air districts for topics including:
 - a. Bundling of repairs to minimize overall emissions
 - b. Exemptions for active observation wells
 - c. Exemptions for inactive wells that are not pressurized
 - d. Delay of survey and delay of repair considerations when there are safety concerns or wildlife presence

- e. Clarifications on the definition of an open well-casing vent
2. Provide an alternate approach to notification requirements for wellhead leaks such that leaks identified above 50,000 ppmv do not require a notification if the leak is repaired within 24 hours of the initial leak measurement.
3. Include Cal e-GGRT reporting considerations including accepted entries for reporting of critical component leaks or delay of repair leaks which have not been repaired by the reporting deadline. Additionally, PG&E recommends aligning all equipment registration requirements to the July 1 deadline associated with annual reporting.

PG&E looks forward to continued collaboration with CARB staff on the forthcoming amendments. Please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

Fariya Ali

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Pacific Gas and Electric