

Kairos Aerospace, a technology start-up based in California's Silicon Valley, is committed to reducing unnecessary emissions from the oil ~~and~~ and gas industry in the most efficient and effective way possible. We commend ARB on its commitment to curb GHG emissions from the oil & gas industry with the proposed regulation for GHG emissions standards. However, the regulation ~~is more prescriptive than necessary~~ takes an inflexible and prescriptive approach to monitoring leaks, resulting in greater expense to California companies for worse environmental outcomes, and ignoring recent research on more efficient methods to monitor equipment and detect leaks. Other states like Colorado and Pennsylvania and federal regulations have incorporated clear pathways for alternative methods & instruments yet California stifles innovations like ours that lead to better outcomes at lower costs. We have, in previous comments, urged the agency to allow industry to use methods & technologies that are demonstrated to be at least as effective as the prescribed methods. We again strongly urge the agency to consider allowing an alternative compliance pathway that is robust and creates an entry point for demonstrated detection solutions. Such an approach will catalyze a race to the top in technology, reduce costs for the regulated industry, and improve environmental outcomes. Thank you for the opportunity to add our comments to this process.