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June 12, 2023

**California Air Resources Board (“CARB”)**

Submitted via CARB’s website

**Re: Notice of Public Hearing to Consider Proposed Amendments to the Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities**

Lodi Gas Storage, L.L.C. and Wild Goose Storage, LLC (together “**Rockpoint**”) herein provide these comments on the Proposed Amendments to the Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities (the “**Amendments**”). Rockpoint has reviewed the Amendments and have concerns regarding Section 95669.1, and of the broad language which allows for remote monitoring methodologies which are not restricted to being satellite based.

In the Statement of Reasons CARB states:

“The CARB Executive Officer may approve a technology for generation and use of satellite-based (*emphasis added)* remote monitoring data if it demonstrates a capability to detect methane plumes and meets certain specifications regarding data resolution, data availability, and plume visualization.”

However, the text of the section does not use the word satellite. The section, at 95669.1(a)(1) reads:

“The remote monitoring data shall be generated by a remote monitoring technology approved by the CARB Executive Officer if, in their best engineering judgment, the technology demonstrates a capability to detect methane emission plumes and meets the following requirements.”

The section allows for the CARB Executive Officer to approve any manner of remote monitoring technology and is not restricted to satellite-based methodologies.

Rockpoint wishes to understand why the Amendment was drafted this way and what other remote monitoring technologies CARB would envision using. Specificity in this regard is required so that Rockpoint can properly assess how the Amendments will affect their facilities and business operations. Once gaining this understanding, then Rockpoint could properly provide feedback and comment to CARB about the implementation of its remote monitoring proposal and all of the possible methodologies employed for monitoring. The Amendment, as drafted, is broad enough that an operator cannot reasonably know how the remote monitoring will be conducted or what its impact on the operations will be.

If it is CARB’s intention for the remote monitoring to be satellite based, then Rockpoint suggests the following language for section 95669.1(a)(1):

“The remote monitoring data shall be generated by a satellite-based remote monitoring technology approved by the CARB Executive Officer if, in their best engineering judgment, the technology demonstrates a capability to detect methane emission plumes and meets the following requirements.”

Rockpoint appreciates the consideration of the foregoing comments and respectfully requests that CARB work with Rockpoint to address the issues outlined above.

Sincerely,

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| Jason A. Dubchak |  | Jason A. Dubchak |
| Vice President, General Counsel & Corporate Secretary |  | Vice-President, General Counsel & Corporate Secretary |
| Lodi Gas Storage, L.L.C. |  | Wild Goose Storage, LLC |