#### Feedback

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| Section | Current text | Proposed text | Rationale |
| § 95667. Definitions. | (62) “Remote monitoring data” means, for the purposes of this subarticle, data obtained by CARB from a satellite-based measurement technology capable of detecting methane plumes. | (62)“Remote monitoring data” means, for the purposes of this subarticle, data obtained by CARB from a satellite- or aircraft-based remote sensing measurement technology capable of detecting methane plumes. | Expanding “remote monitoring data” to include remote sensing aircraft provides flexibility and continuity of leak detection and repair programs during contingency scenarios such as observational gaps resulting from satellite anomalies. It also enables higher resolution location of smaller plumes with follow-up aircraft observations of facilities identified by satellites. Remote sensing is necessary to support the plume visualization capability specified in § 95669.1. |
| § 95669.1 Remotely Detected Emission Plumes | (1) 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:   * + 1. Spatial resolution of 30 by 30 meters or better.     2. Data available to CARB within 72 hours of collection.     3. Produces a visualization of the emission plume. | (1)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:   * + 1. Spatial resolution of 40 meters by 40 meters or better.     2. Data available to CARB within 72 hours of collection for at least 90% of plume detections.     3. Produces a visualization of the emission plume. | Many plume imaging satellites are designed for 30 meter spatial resolution however variations in orbit altitude and off-nadir viewing can translate to spatial resolution of up to 38 meters for prolonged periods. Data with resolution of 40 meters has nearly the same utility as 30 meter resolution. Also, the proper units are either x meters by x meters or meters2.  It is unlikely that any system is capable of providing <= 72 hour latency for 100% of cases (without a large number of false alarms). Some tolerance is recommended for exceptions such as temporary gaps in satellite downlink, delays in transferring data to CARB, natural disasters, etc. |