



May 15, 2015

Submitted electronically via joseph.fischer@arb.ca.gov

Elizabeth Scheehle, Chief
Oil and Gas and Greenhouse Gas Mitigation Branch
California Air Resources Board
1001 "I" St. Sacramento, CA, 95814

Joseph Fischer
Air Resources Engineer
California Air Resources Board
1001 "I" St. Sacramento, CA, 95814

Subject: Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations

Dear Ms. Scheehle and Mr. Fischer,

On behalf of the Center for Biological Diversity and our over 100,000 members and supporters in California, I am submitting these comments regarding the draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations. The Center appreciates the substantial work done by Air Resources Board staff to develop this draft, and we strongly support moving forward with the development of regulations to address the significant problem of methane leakage from oil and gas operations.

The Center agrees with other commenters in strongly urging that the proposed regulation require leak inspections to occur at intervals no greater than quarterly, at all oil and gas facilities, including well sites and compressors. More frequent inspections may be necessary for problematic operations and following changes to operations and equipment. The annual inspection frequency stated in the draft is inadequate and lags behind regulations already in place in other states. There is an obvious need to identify and eliminate leaks as quickly as possible, and it is an unnecessary risk that some large emission would continue unnoticed and unabated for several months when it could otherwise be repaired.

Given the threats that methane poses to our climate, our air, and our health, it is absolutely essential that the state moves quickly to put in place requirements to eliminate methane leakage from oil and gas operations. At the same time, it is important to understand these efforts within the context of a larger plan to transition away from fossil fuels. These regulations achieve their goals only as interim measures while we work toward phasing out oil and gas production and combustion generally.

We strongly support moving forward in developing these regulations and we urge ARB to include a requirement that leak inspections occur at intervals no greater than quarterly, at all oil and gas facilities, including well sites and compressor stations. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Brian Nowicki".

Brian Nowicki
Center for Biological Diversity
(916) 201-6938
bnowicki@biologicaldiversity.org