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Sent: Thursday, February 18, 2016 11:55 AM
To: Scheehle, Elizabeth@ARB
Subject: Comments on Draft Regulations

Good afternoon,

With regards to the Revised Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities, we'd like to mention the following for the general consideration of the Air Resources Board.

- 1) Reliability is a great concern to our facility as Wild Goose has an impeccable record reliability to support PG&E. CARB regulation timing requirements may affect this. For example, if a small leak is discovered and we would have to cease operations for a period of time to repair it, this would put us aside reliability standards with PUC. Perhaps there can be an ability in the regulation to request approval to address these potential conflicts as needed as opposed to just the variance protocol?
- 2) As part of the implementation will there be tiered compliance at the beginning? For example, in some vehicle emissions compliance – 25% of a fleet was required to be made compliance by X date; another 25% by a later date... etc. etc.
- 3) At the Best Practices Meeting you may recall that the ISPs had proposed the idea of a safe harbor proposal and the ISPs and Sempra and PG&E are currently working on fine tuning that proposal. Has CARB considered how this would affect the regulations? It would defeat the purpose of the safe harbor proposal if we all those requirements were then in the AB32 regulations.

Regards,

Lawna Hurl

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