Appendix E:
March 23, 2017 Board Hearing Comment Letters

Comments received in written materials during the second Board Hearing.
March 23, 2017
Kairos Aerospace, a technology start-up based in California’s Silicon Valley, is committed to reducing unnecessary emissions from the oil and gas industry in the most efficient and effective way possible. We commend ARB on its commitment to curb GHG emissions from the oil and gas industry with the proposed regulation for GHG emissions standards. However, the regulation 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.
March 22, 2017

Mary Nichols, Chair
California Air Resources Board

SUBJECT: Proposed Regulation for Greenhouse Gas Emissions Standards for Crude Oil and Natural Gas Facilities

I am writing, to express support for ARB Board Meeting agenda item 17-3-6: Proposed Regulation for Greenhouse Gas Emissions Standards for Crude Oil and Natural Gas Facilities.

As you are aware, ARB and the California Public Utilities Commission staff are working closely to enact new policies to reduce natural gas leaks and minimize methane emissions from the natural gas system, following the directives of Senate Bill (SB) 1371 (Leno, 2015) and Public Utilities Code Section 975, et. seq. via Commission Rulemaking 15-01-008.

The proposed regulations are valuable tools in California’s continuing efforts to reduce greenhouse gas emissions and ensure safe utility infrastructure. They put in place clear expectations for critical components of the gas system. They are another example of the State’s international leadership in addressing climate change and other environmental issues.

The Commission looks forward to continuing our inter-agency collaboration, for the benefit of all Californians.

Sincerely,

Clifford Rechtschaffen, Commissioner
California Public Utilities Commission
California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4, Subarticle 13

Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

Thank you for the opportunity to provide comments on the California Air Resources Board’s (CARB) Final Regulation Order on Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities. Please accept these comments on behalf of Earthworks, a nonprofit organization dedicated to protecting communities and the environment from the impacts of energy development while seeking sustainable solutions. In addition to these written comments, please accept footage Earthworks has taken by our on-staff certified thermographers operating a state-of-the-art Forward Looking Infrared Camera (FLIR).¹

General Comments

We wish to also incorporate by reference, Earthworks comments on this proposed regulation from July 21, 2016.² Overall, Earthworks supports this rule because it helps raise the standard for oil and gas emissions regulation around the country. We also commend CARB for eliminating the proposed “step-down” provision, which can reduce inspection frequency as facilities age.³

These comments will focus primarily upon CARB’s Leak Detection and Repair (LDAR) provisions.⁴ In particular, we wish to use this opportunity to describe the programmatic value third party verifiers can add to California’s LDAR program. If conducted well, a robust third party verification system can ease the regulatory burden on CARB and local Air Resources Boards (ARB), save the industry time and money by preserving the resource they wish to sell to market, and protect communities and the climate.

Citizen LDAR Enforcement

Rules are only as good as their enforcement. This rule contains a potentially very effective and efficient enforcement mechanism that will provide benefits to Californians, their government, and the regulated community. Section 95674(a)(2) allows CARB’s Executive Officer to form agreements with local ARBs on approaches for LDAR implementation. One key implementation approach that CARB executes should involve LDAR programs in partnership with third-party nongovernmental organizations.

Citizen enforcement should play a role complimenting this rule’s required inspections conducted by regulators and industry. These partnerships can follow quality assurance and quality control (QAQC) requirements as determined by CARB. Further, we expect the technicians performing the Optical Gas Imaging (OGI) will have the same certifications as their industry and government counterparts and remain in compliance with all other applicable standards set by CARB.⁵ That is to say, the practical implementation and legal effect of these partnerships need
...not differ in any substantive way from those LDAR programs conducted by operators or regulators under this final regulation order. The OGI technology, reporting requirements, emissions thresholds, penalties, and repair timelines remain identical regardless of the camera holder.⁶

This approach works. On September 29, 2016, Earthworks certified FLIR thermographers, in partnership with Kern County community members, filed a complaint with the San Joaquin Valley Air Pollution Control District (SJVAPCD).⁷ Our FLIR footage indicated tank venting from a heavy oil facility.⁸ The complaint immediately triggered an investigation leading to a notice of violation (NOV).⁹

Given our field experience employing OGI technology and filing complaints, Earthworks believes these partnerships between local ARBs and third party citizen enforcers can work even more efficiently. For example, CARB or local ARBs can adopt an enforcement approach that creates a rebuttable presumption in favor of issuing an NOV immediately upon receipt of a “qualifying complaint”.

CARB or the local ARB could adopt an implementation agreement with a third party similar to those contemplated by 95674(a)(2). Qualifying complaints would contain OGI footage from a certified thermographer of a regulated facility.¹⁰ Third parties then electronically submit these complaints to the local ARB for investigation. After determining its authenticity, regulators then use the footage as evidence in their investigation. That evidence shall create the rebuttable presumption of a violation. A similar arrangement has worked with federal EPA enforcement efforts in the Eagle Ford shale region of Texas.

Conclusion

This final regulation order represents some of the nation’s best protections from greenhouse gas emissions by oil and gas facilities among those states that permit oil and gas activity. Our comment’s focus on LDAR reflects the thousands of field hours our staff and certified thermographers have spent taking infrared images of virtually every kind of onshore oil or gas facility in sixteen states.

Accordingly, we appreciate the opportunity to suggest that allowing citizens to participate in the enforcement of this rule will provide benefits to all Californians, including the regulated community. Furthermore, a robust citizen enforcement component can easily fit within the basic structure of this rule and actually ease the regulator’s enforcement burden.

¹ FLIR cameras qualify under this final regulation order’s definition of “Optical gas imaging” under § 95667(a)(40)
³ See § 95669(g)
⁴ Pursuant to §95669
⁵ See § 95669(g)(1)
⁶ Assuming that the camera holder has a Level II Thermography or equivalent training. See, for example, Tables 1-4 of this final regulation order describing the allowable number of leaks, emission thresholds, and repair time periods (pages 28-29).
⁷ The complaint investigation is attached. Complaint number: S-1609-115
⁸ See § 95667(a)(60)
⁹ NOV #9016761 (October 31, 2016)
¹⁰ In compliance with § 95669(g)(1)
March 23, 2017

Ms. Mary Nichols, Chair
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on 15-day Modifications to Draft ARB Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations

Dear Ms. Nichols:

I am writing to express my concerns regarding certain provisions outlined in the California Air Resources Board (ARB) 15-day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations.

As you know, the oil industry is vital to Kern County’s economy. Over 80% of the state’s oil production occurs in Kern County which makes up a large portion of my District. The tax revenue generated from the oil industry and the tens of thousands of jobs (approximately 45,000) that the industry provides serves as a pillar of Kern County’s economy. When the oil industry is burdened with excessive, expensive, and overreaching regulations with little to no environmental impact or scientific reliability, Kern County’s economy suffers, thus significantly lowering the quality of life for my constituents.

Our oil producers already operate under the most stringent regulations in the nation. I understand the importance of reducing greenhouse gas emissions. But the effectiveness of costs associated with those reductions should also be important to your Board. I ask that you direct your staff to re-assess the cost effectiveness of this program at a future date.

It is imperative that staff weigh the environmental benefits, if any, to the costs associated with implementing the program. I am referring specifically to the leak detection and reporting (LDAR) program. If staff finds that increased inspections do not correlate with a reduction in leaks, then I recommend that your staff look into reducing the frequency of inspections. The purpose of this rule is to reduce greenhouse gas emissions, not to increase bureaucracy and unless there is a strong scientific correlation between inspections and methane emission reductions, I do not believe there is significant reason to justify quarterly LDAR inspections.

Therefore, I respectfully urge ARB to carefully consider the abundant costs associated with the implementation of this rule and verify that those costs are effectively benefitting the environment. Should you have any questions or would like to discuss my letter further, please feel free to contact me at (916) 651-4016. Thank you in advance for your kind consideration.

Sincerely,

JEAN FULLER
Senate Republican Leader
March 20, 2017

Ms. Mary Nichols, Chair
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on 15-day Modifications to Draft ARB Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations

Dear Ms. Nichols,

I am writing to express my concerns regarding leak detection and reporting (LDR) program outlined in the California Air Resources Board (ARB) 15-day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations.

As you know, the oil industry is vital to Kern County’s economy. Over 80% of the State’s oil production occurs in Kern County which makes up a large portion of my district. The industry creates approximately 45,000 jobs for the men and women of the Valley, along with the tax revenue generated from the oil industry provides serve as a pillar of Kern County’s economy. When the oil industry is burdened with excessive, expensive, and overreaching regulations with little to no environmental impact or scientific reliability, Kern County’s residents’ quality of life suffers.

California oil producers already operate under the most stringent regulations in the nation. When implementing the LDR program, it is imperative that the environmental benefits (if any) are weighed against the associated costs.

I respectfully urge the ARB to carefully consider the abundant costs associated with the implementation of this rule and verify that those costs are effectively benefitting the environment. Should you have any questions or would like to discuss my letter further, please feel free to contact me at (916) 651-4014.

Thank you for your kind consideration.

Sincerely,

Andy Vidak
Ms. Mary D. Nichols, Chair
California Air Resources Board
1101 “T” Street
Sacramento, CA 95814

Re: Kern County Board of Supervisor comments in opposition to unnecessary regulations
Proposed Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations (the Methane Rule) March 23/24 Board Hearing

Honorable Chairman and Board members,

The Kern County Board of Supervisors appreciates the opportunity to comment on the proposed Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations. Over 80% of the State’s oil production occurs in Kern County, and over 90% of well stimulation treatments occur in Kern County. Continuous reductions in oil prices have resulted in sweeping layoffs in the oil industry and other related trades, causing economic hardships for many families in Kern County. In addition, the County’s FY 2016-17 discretionary resources shrank by $29 million due to the continued decline in the market price of oil.

While supporting our oil industry as an important source of jobs and property tax revenue, the Kern County Board of Supervisors has also set a high standard for protection of the environment related to oil and gas exploration. The comprehensive Kern County Zoning Ordinance for Oil and Gas Activities effective December 9, 2015 implements new permitting requirements where none existed before, and extensive mitigation measures on new wells, well stimulation and specific ongoing oil and gas activities based on a detailed and publicly reviewed Environmental Impact Report for the entire Kern County oil activity areas. The Board appreciates the coordination and comments we received on this document from your staff and the California Division of Oil, Gas and Geothermal Resources (DOGGR), regarding the environmental impacts and the design of mitigation measures. Many of these measures go beyond regulations currently in place by State Agencies such as DOGGR, RWQCB and the San Joaquin Valley Air Pollution Control District under the authority of the California Environmental Quality Act. Since December 9, 2015, a Kern County Oil and Gas Conformity Review permit must be obtained before any permit is issued from DOGGR.

The Conformity Review process now includes the first uniform air mitigation imposed on oil and gas operations in the State with a standard of no net increase for criteria pollutants, the functional equivalent of zero. The Board of Supervisors executed a precedent setting Emission Reduction Agreement with the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the County collects air mitigation fees on every permit. To date, even in this depressed market, the program has collected over $3 million for use in air reduction grants for replacement of polluting engines, vehicle fleets and other approved programs. This fee is in addition to extensive mitigation measures that address dust control and the already adopted
SJVAPCD requirements that apply to Oil and Gas operations. Our Board, through the adoption of this new and costly program, has shown its support for reasonable and effective environmental protection for our region and our important right to clean air.

We are, however, in opposition to duplicative regulation that increases burdens on the industry without adding to environmental protection. The LDAR program with the SJVAPCD program is effective, locally administered and enforced, and it should be utilized rather than creating a new state program for the same purpose.

The Board appreciates our continued partnership in developing reasonable, meaningful regulations that protects our environment while allowing for economic stability so that we may continue to provide critical services to our communities, including many disadvantaged communities.

Sincerely,

Zack Scrivner, Chairman
Kern County Board of Supervisors

cc:
Mr. Seyed Sedredin Executive Director San Joaquin Valley Air Pollution Control District
Mr. Ken Harris, State Oil and Gas Supervisor CA Division of Oil, Gas and Geothermal
Mr. David Bunn Director, CA Department of Conservation
Kern County Planning and Natural Resources Department
March 14, 2017

Board of Supervisors
Kern County Administrative Center
1115 Truxtun Avenue
Bakersfield, CA 93301

REQUEST FOR POSITION IN OPPOSITION TO INCREASED UNNECESSARY REGULATION OF OIL AND GAS PRODUCERS BY CALIFORNIA AIR RESOURCES CONTROL BOARD AND CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD
Fiscal Impact: None

This is to request that your Board adopt a position in opposition to increased and unnecessary regulation of oil and gas producers by state agencies.

As your Board is aware, continuous reductions in oil prices have resulted in sweeping layoffs in the oil industry and other related trades, causing economic hardships for many families in Kern County. In addition, the County’s FY 2016-17 discretionary resources shrank by $29 million due to the continued decline in the market price of oil.

Several state agencies are proposing further burdensome regulations on oil and gas production while California continues to rely on oil and natural gas for 96% of all vehicle mileage, and while 52% of all electricity generated in California uses natural gas. Therefore, regardless of restrictions aimed at curtailing and eventually ending California oil production, the 32 million cars in use in California will continue to use gasoline, and much of our electricity will continue to be generated from natural gas products. Imposing costly and unnecessary rules on top of those already enacted will only serve to further diminish the local economy and replace local oil production with cheaper imports from other states and nations while heightening the documented environmental risks attached to marine and overland transport of crude oil.

The attached letters request the California Air Resources Control Board and Central Valley Regional Water Quality Control Board to reject proposed uneconomic regulations on California petroleum producers who are already complying with the new Kern County permitting structure, which includes the most comprehensive mitigation measures in the state.
Therefore, IT IS RECOMMENDED that your Board adopt a position in opposition to the increased and unnecessary regulation of oil and gas producers and authorize the Chairman to sign correspondence to the appropriate officials.

Sincerely,

[Signature]
Ryan Alsop
County Administrative Officer

Attachments

cv: California Air Resources Control Board
Central Valley Regional Water Quality Control Board
Western States Petroleum Association
Independent Oil Producers Agency
California Independent Petroleum Association
Kern County Planning and Natural Resources Department
March 23, 2017

Ms. Mary Nichols
Chair
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on 15-day Modifications to Draft ARB Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations

Dear Ms. Nichols:

I am writing to express my concerns regarding certain provisions outlined in the California Air Resources Board (ARB) 15-day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations. I am an attorney at Stoel Rives in Sacramento, California, and my law firm represents operators in the oil and gas industry in Kern County and other areas of California.

When the oil industry is burdened with excessive, expensive, and overreaching regulations with little to no environmental impact or scientific reliability, California’s economy suffers, thus significantly lowering the quality of life for its residents. Oil producers in California already operate under the most stringent regulations in the nation. I understand the importance of reducing greenhouse gas emissions. But the effectiveness of costs associated with those reductions should also be important to your Board. I ask that you direct your staff to re-assess the cost effectiveness of this program at a future date.

It is imperative that staff weigh the environmental benefits (if any) to the costs associated with implementing the program. I am referring specifically to the leak detection and reporting (LDAR) program. If staff finds that increased inspections do not correlate with a reduction in leaks, then I recommend that your staff look into reducing the frequency of inspections. The purpose of this rule is to reduce greenhouse gas emissions, not to increase bureaucracy, and unless there is a strong scientific correlation between inspections and methane emission reductions, I do not believe there is significant reason to justify quarterly LDAR inspections.
Ms. Mary Nichols  
March 23, 2017  
Page 2

Therefore, I respectfully urge ARB to carefully consider the abundant costs associated with the implementation of this rule and verify that those costs are effectively benefitting the environment. Should you have any questions or would like to discuss my letter further, please feel free to contact me at (916) 319-4642. Thank you in advance for your kind consideration.

Very truly yours,

[Signature]

Michael N. Mills
RE: CARB Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations ("Methane Rule")

C&J Well Services, Inc. ("CJWS"), a leading provider of well construction, well completions, well support and other complementary oilfield services to the oil and gas exploration and production companies in the U.S. and Western Canada, provides rig services and fluid management services, among other services in California such as well drilling services. CJWS has participated for the past 24 years in the development of emissions-reducing regulations for California. CJWS is a member of Western States Petroleum Association to ensure that our domestic petroleum industry remains a strong contributor to California's vitality and quality of life. CJWS advocates cost effective regulations and achieving a balanced approach between environmental protection and viability of the oil industry.

The California Air Resources Board ("CARB") is developing an AB32 Upstream Methane Rule on the oil and gas industry and several items related to the draft regulations concern CJWS. California has the most stringent recovery requirements and this regulation will be another regulatory layer. The existing regulations, effectively carry out CARB mandates.

Further, this regulation will result in additional cost burdens across the industry on top of costs for existing vapor recovery requirement already in place. CJWS is concerned about the burdensome financial impact from the regulations on operators. CARB cost estimates to install vapor recovery systems are approximately $35,000 to $100,000 on each tank and industry cost estimates are closer to $250,000 to $500,000 for the same equipment. We urge CARB staff to re-evaluate the implementation costs and operating costs to determine whether the cost of regulation is cost-effective. Another concern is that the contractors supporting the oil and gas operators are investing millions of dollars in equipment and engines in the portable, off-road and on-road application to reduce greenhouse gas emissions. With all the investments by operators in the past to reduce greenhouse gases, the higher cost impact from the Methane Rule and cost to support contractors on the reduction of greenhouse gas emissions, the petroleum industry is currently investing millions which will result in a reduction of activities and a loss of jobs in California.

This rule incorporates thousands of new components requiring leak detection checks on a quarterly basis. Oil producers have been under LDAR programs through the SJVAPCD for decades with a high rate of success. This additional requirement will add significant costs for leak inspections. We urge the Board to reconsider re-incorporating the "Step-Down" provision during re-assessment and based on data showing minimal leaks.

Our major concern is the safety of all the employees exposed to the vapor recovery system. The vapor recovery system requirements for circulation tanks in this rule have the potential to pose significant safety risks to operators and contractors in the field. There are numerous flammable and inflammable solids and gases present during oil and gas production. To capture oxygen-rich vapors from circulation tanks in a closed system is unsafe and poses a huge fire risk. We urge CARB staff to review the rule's requirements and to develop solutions to reduce the exposure of danger to the field employees.
The oil industry has a long-standing history of leadership in environmental compliance and commitment to continued improvement. We continue to look forward in working with CARB staff on the development of solutions to the Methane Rule and developing a cost-effective regulation. If you have any questions regarding our comments, please contact Jerry Fernandez at 661-201-6056 or by email at jerry.fernandez@cjenergy.com.

Sincerely,

Jerry Fernandez
Environmental Compliance Manager
March 23, 2017

Ms. Mary Nichols
Chair
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: 15 Day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil & Natural Gas Operations

On behalf of the NOR Chamber of Commerce, I am writing to express my concerns regarding certain provisions outlined in the California Air Resources Board (ARB) 15-day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations.

California already has some of the most rigorous regulations on the oil industry. Over 80% of the state’s oil production occurs in Kern County. The tax revenue generated from the oil industry and the thousands of jobs are a vital aspect to the local economy. Adding additional regulations will hurt business owners and our economy. Kern County cannot afford excessive regulations that have a negative impact on local businesses.

We are concerned about the high cost impact the regulation will have on operators. ARB cost estimates to install vapor recovery systems on a tank is about $35,000 to $100,000 whereas industry cost estimates are closer to $250,000 to $500,000. We feel that ARB did not take into consideration all costs, not just equipment cost or one-time costs. We urge ARB staff to utilize the data collected to review the cost to actual methane emissions reduced to determine whether the cost of the regulation is effective or not at a future date.

For these reasons, we respectfully urge ARB to carefully consider the abundant costs associated with the implementation of this rule and verify that those costs are truly benefitting the environment and do not restrict jobs in our communities.

Sincerely,

John Heath
President
NOR Chamber of Commerce
March 23, 2017

Ms. Mary Nichols
Chair
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: 15 Day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil & Natural Gas Operations

On behalf of the NOR Chamber of Commerce, I am writing to express my concerns regarding certain provisions outlined in the California Air Resources Board (ARB) 15-day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations.

California already has some of the most rigorous regulations on the oil industry. Over 80% of the state's oil production occurs in Kern County. The tax revenue generated from the oil industry and the thousands of jobs are a vital aspect to the local economy. Adding additional regulations will hurt business owners and our economy. Kern County cannot afford excessive regulations that have a negative impact on local businesses.

We are concerned about the high cost impact the regulation will have on operators. ARB cost estimates to install vapor recovery systems on a tank is about $35,000 to $100,000 whereas industry cost estimates are closer to $250,000 to $500,000. We feel that ARB did not take into consideration all costs, not just equipment cost or one-time costs. We urge ARB staff to utilize the data collected to review the cost to actual methane emissions reduced to determine whether the cost of the regulation is effective or not at a future date.

For these reasons, we respectfully urge ARB to carefully consider the abundant costs associated with the implementation of this rule and verify that those costs are truly benefitting the environment and do not restrict jobs in our communities.

Sincerely,

John Heath
President
NOR Chamber of Commerce
March 23, 2017

Ms. Mary Nichols
Chair
California Air Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on 15-day Modifications to Draft ARB Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations

Dear Ms. Nichols:

We are writing to express our concerns regarding certain provisions outlined in the California Air Resources Board (ARB) 15-day Modifications to the Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Operations.

As you know, the oil industry is vital to Kern County’s economy. Over 80% of the State’s oil production occurs in Kern County. The tax revenue generated from the oil industry and the tens of thousands of jobs (approximately 45,000) that the industry provides serves as a pillar of Kern County’s economy. When the oil industry is burdened with excessive, expensive, and overreaching regulations with little to no environmental impact or scientific reliability, Kern County’s economy suffers, thus our collective businesses and organizations are negatively impacted.

Our oil producers already operate under the most stringent regulations in the nation. While we understand the importance of reducing greenhouse gas emissions, we believe the effectiveness of costs associated with those reductions should also be important to your Board.

It is imperative that staff weigh the environmental benefits (if any) to the costs associated with implementing the program. We are referring specifically to the leak detection and reporting (LDAR) program. If staff finds that increased inspections do not correlate with a reduction in leaks, then we recommend that your staff consider reducing the frequency of inspections. The purpose of this rule is to reduce greenhouse gas emissions, not to increase bureaucracy; unless there is a strong scientific correlation between inspections and methane emission reductions, we do not believe there is significant reason to justify quarterly LDAR inspections.

Therefore, we respectfully urge ARB to carefully consider the abundant costs associated with the implementation of this rule and verify that those costs are effectively benefitting the environment. Thank you in advance for your kind consideration.

Sincerely,

Gregory D. Bynum
Gregory D. Bynum and Associates, Inc.

Tom Bracken
Sunridge Nurseries

Sheri Horn-Bunk
Taft College/ West Kern Community College District