



Mandatory Greenhouse Gas Reporting Rule Subpart W – Petroleum and Natural Gas: EPA's Response to Public Comments

[This page is intentionally left blank.]

November 2010

Mandatory Greenhouse Gas Reporting Rule Subpart W – Petroleum and Natural Gas

[This page is intentionally left blank.]

U. S. Environmental Protection Agency

Office of Atmosphere Programs

Climate Change Division

Washington, D.C.

[This page is intentionally left blank.]

FOREWORD

This document provides responses to public comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Mandatory Greenhouse Gas Reporting Rule Subpart W – Petroleum and Natural Gas. EPA published a Notice of Proposed Rulemaking in the Federal Register on April 12, 2010 (75 FR 18576). EPA received comments on this proposed rule via mail, e-mail, facsimile, and one public hearing in Arlington, VA in April 2010. Copies of all comments submitted are available at the EPA Docket Center Public Reading Room. Comments letters and transcripts of the public hearings are also available electronically through <http://www.regulations.gov> by searching Docket ID EPA-HQ-OAR-2009-0926.

Due to the size and scope of this rulemaking, EPA prepared this document in multiple volumes, with each volume focusing on a different broad subject area of the rule. This overall Response to Comments document provides EPA's responses to significant public comments regarding the Mandatory Greenhouse Gas Reporting Rule Subpart W – Petroleum and Natural Gas. In certain cases, EPA has summarized comments or groups of similar comments and then has responded to these summaries. In addition, footnote numbers in this Response to Comments document do not correspond to the exact footnote numbers in the commenter's original submissions.

Comments were assigned to specific volumes of this Response to Comments document based on an assessment of the principal subject of the comment; however, some comments inevitably overlap multiple subject areas. For this reason, EPA encourages the public to read the other volumes of this document relevant to their interests.

While EPA has made every effort to ensure the accuracy of the discussion in the response to comment document, the obligations of the regulated community are determined by statutes, regulations or other legally binding requirements. In the event of a conflict between the discussion in these responses to comment and the Subpart W rule or any statute or regulation, the response to comment document would not be controlling.

The primary contact regarding questions or comments on this document is:

Carole Cook (202) 343-9263

U.S. Environmental Protection Agency

Office of Atmospheric Programs

Climate Change Division

Mail Code 6207-J

1200 Pennsylvania Avenue, NW

Washington, D.C. 20460

ghgreportingrule@epa.gov

[This page is intentionally left blank.]

[This page is intentionally left blank.]

TABLE OF CONTENTS

Acronyms and Abbreviations	1
Volume 1: Selection of Source Categories and Level of Reporting.....	1
1.0 Selection of Source Categories and Level of Reporting	1
1.1 Selection of Source Categories to Report	5
1.2 Selection of Level of Reporting	107
Volume 2: Selection of Reporting Thresholds, Greenhouse Gases and De Minimis Provisions	159
2.0 Selection of Reporting Thresholds, Greenhouse Gases and De Minimis Provisions	159
2.1 Selection of Greenhouse Gases to Report	159
2.2 Selection of Thresholds	173
2.3 De Minimis Reporting	215
Volume 3: General Monitoring Approach, the Need for Detailed Reporting, and Other General Rationale Comments	228
3.0 General Monitoring Approach, the Need for Detailed Reporting, and Other General Rationale Comments	228
3.1 Rationale for General Monitoring Approach	228
3.1.1 Segregate by Source Type (Tanks, Compressors, etc.)	232
3.2 Need for Detailed Data Collection	233
3.3 Other General Rationale Comments	241
Volume 4: Approach to Verification and Missing Data	243
4.0 Approach to Verification and Missing Data	243
4.1 Selection of Verification Approach	243
4.2 Missing Data	245
Volume 5: Initial Year of Reporting, Duration of the Reporting Program and Provisions to Cease Reporting	254
5.0 Initial Year of Reporting, Duration of the Reporting Program and Provisions to Cease Reporting	254
5.1 Selection of the Initial Reporting Year	255
5.2 Once In Always In Policy	305
5.3 Duration of the Reporting Program	305
Volume 6: Relationship to Other GHG Reporting Programs	306
6.0 Relationship to Other GHG Reporting Programs	306
6.1 General Consistency with Other Reporting Programs	306
6.2 Duplicative Requirements: The Climate Registry (TCR)	315
6.3 Duplicative Requirements: Other Programs	316
6.4 Inventory of U.S. GHG Emissions and Sinks	329
6.5 How Will This Rule Affect EPA’s Voluntary GHG Reporting Programs	330

Volume 7: The Rule Development Process, Statutory and Executive Order Reviews, and Other Miscellaneous Comments.....	331
7.0 The Rule Development Process, Statutory and Executive Order Reviews, and Other Miscellaneous Comments	331
7.1 General Rule Development Process	331
7.1.1 Rule Development.....	333
7.1.2 Public Participation	333
7.1.3 Requests for Extension of Comment Period	333
7.2 Statutory and Executive Order Reviews	335
7.2.1 Paperwork Reduction Act	335
7.2.2 Unfunded Mandates Reform Act (UMRA).....	337
7.3 Miscellaneous Comments Directly Relevant to the GHG Reporting Rule	337
7.3.1 General Support for the Rule	339
7.3.1.1 General Support – Does Not Require a Response.....	346
7.3.2 General Opposition to the Rule.....	902
7.3.3 Other.....	908
Volume 8: Compliance and Enforcement.....	919
8.0 Compliance and Enforcement	919
8.1 Compliance Assistance	919
8.2 Role of States	925
8.3 Enforcement	927
Volume 9: Legal Issues.....	928
9.0 Legal Issues	928
9.1 Statutory Authority.....	930
9.1.1 Segregate Offshore Issues Separately	939
9.2 Confidential Business Information (CBI)	945
9.3 Relationship to Other Clean Air Act (CAA) Programs.....	947
9.4 Comments Related to Procedures	954
9.5 Comments on Portable Equipment Reporting Requirement	954
9.6 Comments on Leased/Rented Equipment Reporting Requirement.....	961
9.7 Comments on Reporting of Contractor Emissions.....	962
9.8 Other Legal Comments	969
Volume 10: Cost and Economic Impacts of the Rule	972
10.0 Cost and Economic Impacts of the Rule	972
10.1 Methodology Used to Estimate Cost Impacts	972
10.2 Verification Methodology and Costs	981
10.3 Cost Impacts.....	987
10.4 Economic Impacts.....	1075
10.5 Impacts for Small Entities	1078
10.6 Benefits for Society.....	1089
10.7 General Comments on Costs and Economic Impacts	1090

Volume 11: Designated Representative and Data Collection, Reporting, Management, and Dissemination	1096
11.0 Designated Representative and Data Collection, Reporting, Management, and Dissemination.....	1096
11.1 Designated Representative (Authorization and Responsibilities).....	1096
11.2 Process for Data Collection/Reporting, Management, and Dissemination	1097
11.2.1 Data Collection Methods (Comments on Section VI.B of the Preamble)	1105
11.2.1.1 Electronic Signatures.....	1106
11.2.1.2 Use of Unique Identifiers	1106
11.2.1.3 Metric Units.....	1106
11.2.1.4 Delegation of Authority to States for Data Collection	1106
11.2.1.5 Use of an Electronic Reporting System	1107
11.2.2 Data QA and Feedback by EPA to Reporters	1107
11.2.3 Data Dissemination	1107
11.2.3.1 Data Dissemination to the Public	1107
11.2.3.2 Sharing of Data with Other State and Federal Agencies.....	1108
Volume 12: Monitoring and QA/QC Requirements.....	1110
12.0 Monitoring and QA/QC Requirements	1110
12.1 Methodology Used to Detect GHG Emissions.....	1112
12.2 Frequency of Monitoring	1196
12.3 Use of Method 21 Detection Methods	1202
12.4 Use of Best Available Information.....	1203
Volume 13: Selection of Proposed GHG Emissions Calculation and Monitoring Methods	1217
13.0 Selection of Proposed GHG Emissions Calculation and Monitoring Methods ...	1217
13.1 Emission Factors	1246
13.1.1 Population Factors.....	1307
13.1.2 Leaker Factors	1316
13.1.3 Alternative Options to Consider.....	1336
13.2 Greenhouse Gas Calculation Procedures	1350
13.2.1 Well Venting, Completion and Unloading Calculations.....	1390
13.2.2 Tank Emissions	1417
13.2.2.1 Onshore Production and Processing Tanks.....	1422
13.2.2.2 Transmission Storage Tanks	1450
13.2.3 Dehydrator Emissions Estimates.....	1458
13.2.4 Acid Gas Removal Vents	1474
13.2.5 Flare Calculations.....	1488
13.2.5.1 Flare Stacks	1495
13.2.5.2 Associated Gas Venting and Flaring.....	1500
13.2.6 Blowdown Vent Stacks	1502
13.2.7 Compressors	1518
13.2.7.1 Centrifugal Compressors.....	1523

13.2.7.2	Reciprocating Compressors.....	1532
13.2.8	Offshore Emissions Calculations (GOADS System).....	1561
13.2.8.1	Federal Waters.....	1569
13.2.8.2	State Waters.....	1569
13.2.9	Calculation of Volumetric and Mass Emissions	1570
13.2.10	EOR Injection Pump Blowdown.....	1575
13.2.11	Dissolved CO ₂ Calculations	1578
13.2.11.1	Hydrocarbon Liquids.....	1580
13.2.11.2	Produced Water	1589
13.2.12	Portable Equipment Combustion Emissions	1597
Volume 14: Definitions and Boundaries		1606
14.0	Definitions and Boundaries	1606
14.1	Onshore Production Facility Definition	1611
14.1.1	Basin.....	1649
14.1.2	Field.....	1655
14.2	Definition of Natural Gas	1656
14.3	Onshore Gas Processing Boundary (Production versus Processing)	1658
14.4	Use of “Equipment” Leak versus Fugitive and Vented Leaks	1682
14.5	Boundary Issues with Subpart RR	1686
14.6	Other.....	1687

Acronyms and Abbreviations

AAPG	American Association of Petroleum Geologists
AGA	American Gas Association
AGR	acid gas removal
ANSI	American National Standards Institute
API	American Petroleum Institute
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
BAMM	Best Available Monitoring Methods
BLS	Bureau of Labor Statistics
BOEMRE	Bureau of Ocean Energy Management, Regulation and Enforcement
CAA	Clean Air Act
CBI	confidential business information
CBM	coal bed methane
CEMS	continuous emission monitoring systems
cf	cubic feet
CFR	Code of Federal Regulations
CH ₄	methane
CO ₂	carbon dioxide
CO ₂ e	CO ₂ -equivalent
DOE	Department of Energy
E&P	exploration and production
EIA	Economic Impact Analysis
EO	Executive Order
EOR	enhanced oil recovery
EPA	U.S. Environmental Protection Agency
ESD	emergency shutdown
FPSO	floating production and storage offloading
FR	Federal Register
GHG	greenhouse gas

GOR	gas to oil ratio
GRI	Gas Research Institute
GWP	global warming potential
IBR	incorporation by reference
ICR	information collection request
IPCC	Intergovernmental Panel on Climate Change
IR	infrared
ISO	International Organization for Standardization
kg	kilograms
LACT	lease automatic custody transfer
LDCs	local natural gas distribution companies
LNG	liquefied natural gas
LPG	liquefied petroleum gas
M&R	meters and regulators
MMBTU	million British thermal units
MMS	Minerals Management Service
mmscfd	million standard cubic feet per day
MMTCO ₂ e	million metric tons carbon dioxide equivalent
MRR	mandatory GHG reporting rule
N ₂ O	nitrous oxide
NAESB	North American Energy Standards Board
NAICS	North American Industry Classification System
NGLs	natural gas liquids
NTTAA	National Technology Transfer and Advancement Act
OAQPS	Office of Air Quality, Planning and Standards
OMB	Office of Management and Budget
OVA	organic vapor analyzer
ppm	parts per million
QA	quality assurance
QA/QC	quality assurance/quality control
RFA	Regulatory Flexibility Act

RGGI	Regional Greenhouse Gas Initiative
RIA	Regulatory Impact Analysis
SBREFA	Small Business Regulatory Enforcement and Fairness Act
SSM	startup, shutdown, and malfunction
STP	standard temperature and pressure
TCR	The Climate Registry
TSD	technical support document
TVA	toxic vapor analyzer
U.S.	United States
UMRA	Unfunded Mandates Reform Act of 1995
USC	United States Code
USGS	United States Geologic Society
VOC	volatile organic compound(s)
WCI	Western Climate Initiative

VOLUME 1: SELECTION OF SOURCE CATEGORIES AND LEVEL OF REPORTING

1.0 SELECTION OF SOURCE CATEGORIES AND LEVEL OF REPORTING

Comment Number: EPA-HQ-OAR-2009-0923-1024-13

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

Lastly, the proposed rule requires clarification as to whether petroleum and natural gas systems will be added to the list of facilities in 40 C.F.R. SECTION 98.2(a)(2). As currently drafted, the applicability provision of Subpart W references SECTION 98.2(a)(2), even though Subpart W is not proposed to be listed in SECTION 98.2(a)(2) and EPA's direct final rule amending the format of the list in SECTION 98.2(a)(2) was withdrawn. Kinder Morgan asks that EPA's final rule clarify which of the applicability provisions in Subpart A will apply to petroleum and natural gas systems.

Response: EPA has reviewed the comment and has clarified in today's final rule that it is amending Table A-4 referenced in Section 98.2(a)(2) to include the petroleum and natural gas systems source category. In addition, EPA is amending Section 98.2(a) so that 40 CFR Part 98 applies to facilities located in the United States and on or under the Outer Continental Shelf. This revision is necessary to ensure that any petroleum or natural gas platforms located on or under the Outer Continental Shelf of the United States will be required to report under this rule.

Comment Number: EPA-HQ-OAR-2009-0923-1024-11

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

Safety Implications of the Proposed Rule. Protecting the health and safety of our employees is a top priority at Kinder Morgan, and it surely is a key consideration for EPA in crafting the Mandatory Reporting Rule. Kinder Morgan believes that EPA would agree that while the collection of emissions data is important, it cannot justify placing workers in the field in physical jeopardy.

Our experience in field-testing the methodologies in the proposed Subpart W shows that those methodologies require testing at some units or components that are unsafe to monitor or are physically inaccessible. Some source types for which the proposed Subpart W requires direct emissions measurement are commonly located high off the ground, above uneven ground where a manlift cannot be safely placed. Source types that are often unsafe to monitor include reciprocating compressor rod packing venting, onshore production and processing storage tanks,

transmission storage tanks, and centrifugal compressor wet seal degassing venting. In some cases, emitting components are located in extremely hazardous environments, such as near high-temperature exhaust vents or pressurized piping. Indeed, some units that would require direct measurement under Subpart W are located in areas with high ambient concentrations of hydrogen sulfide, a condition that would raise safety concerns under the Occupational Health and Safety Administration's (OSHA) 29 CFR 1910.1200 workplace safety regulations. EPA has not adequately considered these hazards or the hazards associated with working at height, as regulated under 29 CFR 1910 Subpart D and Subpart F. These safety conditions would greatly complicate employee access even under the best of circumstances, and even more so when employees must carry emissions monitoring equipment, protection harnesses, and clipboards.

The photograph below graphically illustrates the perilous conditions our employees and contractors would regularly face if asked to carry out the proposed rule as it is currently written:

[See Original Comment for Photograph]

The above photograph depicts an exhaust stack and a vent stack at a Kinder Morgan natural gas transmission compression facility. The vent is the smaller diameter pipe on the left, angled towards the exhaust stack. Seal gas vents on centrifugal compressors are routed in the above configuration to allow the exhaust stack stream to destroy the lube oil vapors contained in the vent stream. Because the exhaust stream normally contains gas at a temperature of 800-1000 [temperature degree symbol] F, the above unit would be impossible to directly meter in a safe manner.

To avoid placing the safety of employees and contractors at risk, Kinder Morgan urges EPA to include an exemption for components that are unsafe to access, or to allow use of emission factors or best available monitoring methods (BAMM). Reporting entities could document their use of the exemption by including photographs of the inaccessible components or an explanation of the hazards associated with particular components. A useful model for such a provision is 40 CFR Part 60 Subparts VV and VVa of EPA's New Source Performance Standards (NSPS), which address leaks of volatile organic compounds from equipment in synthetic organic chemicals manufacturing. These subparts permit facilities to designate certain valves, connectors, and pumps as "unsafe to monitor" or "difficult to monitor," provided that the designation is adequately documented and accompanied by a written plan for monitoring.¹ These provisions also appear in Subpart KKK of the NSPS regulations, which establish performance standards for equipment leaks of volatile organic compounds from natural gas processing plants.²

Response: EPA recognizes the importance of ensuring safety. Rather than provide exemptions, EPA has added alternative reporting methodologies to ensure safety in the collection of data from certain sources.

¹ See 40 C.F.R. SECTIONS 60.482-7a(g)-(h), 60.482-2a(g), 60.482-11a(e), 60.486a(f).

² See 40 C.F.R. SECTION 60.632(a) (incorporating portions of Subpart VV by reference).

For example, EPA has added in today's final rule alternative emissions estimating methods which can be performed safely when direct, end of stack emissions measurement is deemed unsafe or less economical for the reporter. For gas processing, transmission, storage, LNG storage and LNG import/export terminals, today's final rule provides options of installing ports in vent lines which are unsafe to access the end of the vent stack, or, in the case of transmission condensate tank emissions from malfunctioning compressor scrubber dump valves, the use of acoustic detectors which have algorithms for equating detector readings with through-valve leakage. Compressor unit isolation valves also have the option in today's final rule to use the acoustic detector for quantifying unit valve through leakage while compressors are in the shut-down, depressurized mode when unit valves are not blinded. EPA recognizes that some compressor vent piping, especially around reciprocating compressors, is manifolded with other vents including blowdown vents, but that this piping is generally small diameter and suitable for cost-effective installation of piping loops for installation of direct measurement instruments such as a vane or hot-wire anemometer or pitot tube. With regard to equipment leaks, today's final rule allows use of any hand-held leak detection method listed in the LDAR regulations Method 21 for equipment leaks that can be accessed safely within two meters of the ground. For inaccessible equipment leaks, the IR leak imaging camera is required for safe, positive identification of those leaking sources. EPA concluded that all equipment leaks can be safely detected using the IR leak imaging cameras, and that this equipment is cost-effective given the leak survey is required only once per year. However, should such instruments or contractor services be unavailable in time for meeting the first year's date gathering, today's final rule also includes the opportunity for filing a BMM request. For more information on BMM, see Section II.F.4 of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1024-44

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

SECTION 98.232 GHGs to report.

(a) You must report CO₂ and CH₄ emissions from each industry segment specified in paragraph (b) through (i) of this section. *For each industry segment specified in paragraph (b) through (i) of this section, only those emissions from the source types listed in the corresponding paragraph must be reported.*

(b) For offshore petroleum and natural gas production, report emissions from all "stationary fugitive" and "stationary vented" sources as identified in the Minerals Management Service (MMS) Gulfwide Offshore Activity Data System (GOADS) study (2005 Gulfwide Emission Inventory Study MMS 2007-067).

(c) For onshore petroleum and natural gas production, report emissions from the following source types: (1) Natural gas pneumatic high bleed device venting. (2) Natural gas pneumatic low bleed device venting. (3) Natural gas driven pneumatic pump venting. (4) Well venting for liquids unloading. (5) Gas well venting during conventional well completions. (6) Gas well

venting during unconventional well completions. (7) Gas well venting during conventional well workovers. (8) Gas well venting during unconventional well workovers. (9) ~~Gathering pipeline fugitives~~ (10) *Produced liquids storage* tanks. (11) Reciprocating compressor rod packing venting. (12) Well testing venting and flaring. (13) Associated gas venting and flaring. (14) Dehydrator vent stacks. (15) Coal bed methane produced water emissions. (16) EOR injection pump blowdown. (17) Acid gas removal vent stack. (18) Hydrocarbon liquids dissolved CO₂. (19) Centrifugal compressor wet seal degassing venting. (20) Produced water dissolved CO₂. (21) Fugitive emissions from valves, connectors, open ended lines, pressure relief valves, compressor starter gas vents, pumps, flanges, and other fugitive sources (such as instruments, loading arms, pressure relief valves, stuffing boxes, compressor seals, dump lever arms, and breather caps for crude services).

(d) For field gathering and/or boosting stations, report emissions from the following sources: (1) Reciprocating compressor rod packing venting. (2) Centrifugal compressor wet seal degassing venting. (3) Transmission condensate storage tanks. (4) Blowdown vent stacks. (5) Natural gas pneumatic high bleed device venting. (6) Natural gas pneumatic low bleed device venting. (7) Fugitive emissions from connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines.

(d) For onshore natural gas processing *plants*, report emissions from the following sources: (1) Reciprocating compressor rod packing venting. (2) Centrifugal compressor wet seal degassing venting. (3) *Produced liquids storage* tanks. (4) Blowdown vent stacks. (5) Dehydrator vent stacks. (6) Acid gas removal vent stack. (7) Flare stacks. (8) ~~Gathering pipeline fugitives~~ (9) Fugitive emissions from: valves, connectors, open ended lines, pressure relief valves, meters, and centrifugal compressor dry seals.

(e) For onshore natural gas transmission compression, report emissions from the following sources: (1) Reciprocating compressor rod packing venting. (2) Centrifugal compressor wet seal degassing venting. (3) Transmission *condensate* storage tanks. (4) Blowdown vent stacks. (5) Natural gas pneumatic high bleed device venting. (6) Natural gas pneumatic low bleed device venting. (7) Fugitive emissions from connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines.

(f) For underground natural gas storage, report emissions from the following sources: (1) Reciprocating compressor rod packing venting. (2) Centrifugal compressor wet seal degassing venting. (3) Natural gas pneumatic high bleed device venting. (4) Natural gas pneumatic low bleed device venting. (5) Fugitive emissions from connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines.

(m) Notwithstanding any other provision of this section, use the procedure specified in SECTION 98.233(aa) to estimate emissions from individual components for which reporting would otherwise be required under paragraphs (b) through (i) but are designated as “unsafe to monitor” or “difficult-to-monitor” in accordance with this paragraph.

(1) You must maintain a log in a readily accessible location providing identification numbers for any components that you deem unsafe-to-monitor or difficult-to-monitor, along with an explanation of why those components are unsafe-to-monitor or difficult-to-monitor.

(2) A component is unsafe-to-monitor if monitoring personnel would be exposed to immediate danger as a result of carrying out the monitoring requirements that would otherwise be required under SECTION 98.233.

(3) A component is difficult-to-monitor if monitoring personnel would have to be elevated more than 2 meters above a support surface in carrying out the monitoring procedures that would otherwise be required under SECTION 98.233. No more than 3 percent of the total number of components that are required to be monitored at a given facility under this subpart may be classified as difficult-to-monitor.

(4) Use the alternative monitoring methodology in SECTION 98.233(aa) to report emissions from components that are unsafe-to-monitor or difficult-to-monitor.

Response: EPA has made a numbers of changes to Section 98.232 of today's final rule. For example, the Agency has revised the definition for natural gas processing and onshore petroleum and natural gas production to not include gathering lines and boosting stations from the source category. For more information, please see Section II.F of the preamble. EPA does not agree for the need to define components which are difficult or unsafe to monitor for equipment leaks. Please see response to EPA-HQ-OAR-2009-0923-1024-11.

1.1 SELECTION OF SOURCE CATEGORIES TO REPORT

Comment Number: EPA-HQ-OAR-2009-0923-0741-1

Organization:

Commenter: C. Hauschild

Comment Excerpt Text:

If the greenhouse gas reporting rule is to have any value, it must pertain to all industries. To let a few opt out is extremely unfair and negates the entire purpose of the regulation.

Response: EPA has considered this comment, and while EPA can not respond to any specific point as the comment is vague: the MRR is indeed economy-wide and therefore collects GHG data from sources responsible for approximately 80% of all U.S. GHG emissions.

Comment Number: EPA-HQ-OAR-2009-0923-3568.5-4

Organization: Environmental Defense Fund

Commenter: Peter Zalzal

Comment Excerpt Text:

We are concerned, however, that the agency excluded waste pit facilities from the proposal, and we are eager to look more closely at this issue and provide EPA with additional detail in our written comments.

Response: Please see EPA-HQ-OAR-2009-0923-1155-28 for a response to this comment.

Comment Number: EPA-HQ-OAR-2009-0923-1206-12

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

The proposed calculation for gas gathering pipelines is impractical.

EPA is proposing to not include reporting of fugitive emissions from natural gas transmission pipelines due to the dispersed nature of the fugitive emissions and the fact that once leaks are found, the emissions are generally addressed quickly. EPA fails to use this same logic for natural gas gathering pipelines, which are significantly more dispersed than transmission pipelines. Gas gathering lines are generally much smaller diameter and typically operate at much lower pressures than transmissions lines, resulting in a lower potential for emissions. Some gathering pipelines even operate on a vacuum. It is also important to note that many gathering and processing companies have implemented robust programs to find and fix pipelines leaks. Contrary to the transmission pipelines, EPA appears to propose that gas processing plants and producers conduct a physical count of piping components on gathering lines and use population factors to determine emissions. Operators then apply another factor (scf/hour/mile) to calculate GHG emissions from the pipeline segments.

GPA estimates that there are over 250,000 miles of gathering pipelines in the gathering and processing sector, and hundreds of thousands of meter and valve settings, that would require physical component counts. Even more impractical, is the requirement to conduct compositional analysis at these sites to determine methane and CO₂ concentrations. Further, operators would have to track blowdowns and changes in small meter runs and pipe segments in these hundreds of thousands of insignificant locations to report GHGs as required by proposed Subpart W.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EMAIL-0001-5 (comment also located in rulemaking memo "Early Comment Submissions" in docket EPA-HQ-OAR-2009-0923)

Organization: American Exploration and Production Council

Commenter:

Comment Excerpt Text:

Fugitive Emissions from Pipelines (such as flowlines or intra-facility gathering lines)

These emissions should be exempt from reporting for the same reasons that EPA exempted

emissions from transmission lines. Gathering pipelines generally operate at much lower pressures than transmission lines. The interconnecting pipelines consist mostly of welded connections and thousands of small metering stations. EPA has underestimated the burden to industry to obtain component counts on these pipeline facilities. In addition, many companies now have internal programs to find and fix leaks associated with these gathering pipelines as well as for the longer distance transmission lines.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1080-17

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Aka recommends that, consistent with treatment of transmission pipelines, small volume gathering pipelines and flow lines be excluded from fugitive reporting due to the dispersed nature of the emissions and the impracticality of the requirements of proposed Subpart W. We suggest that "small volume" be defined as below the threshold of 2500 miles per owner/operator, which equates to about 25k tpy using EPA's proposed emissions calculation method for gathering lines.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1080-5

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Aka believes that the proposed calculation for gathering pipelines is impractical. EPA is proposing to not include reporting of fugitive emissions from natural gas transmission pipelines due to the dispersed nature of the fugitive emissions and the fact that once leaks are found, the emissions are generally addressed quickly. EPA fails to use this same logic for natural gas gathering pipelines, which are significantly more dispersed than transmission pipelines. Gas gathering lines are generally much smaller diameter and typically operate at much lower pressures than transmission lines, resulting in a lower potential for emissions. Some gathering pipelines even operate on a vacuum. It is also important to note that many gathering and processing companies have implemented robust programs to find and fix pipeline leaks. EPA appears to propose that gas processing plants and producers conduct a physical count of piping components on gathering lines and use population factors to determine emissions. Operators then apply another factor (scf/hour/mile) to calculate GHG emissions from the pipeline segments.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1198-11
Organization: West Virginia Oil and Natural Gas Association
Commenter: Nicholas DeMarco

Comment Excerpt Text:

The final rule excludes the reporting of fugitive emissions from natural gas transmission pipelines due to the dispersed nature of the fugitive emissions and the fact that once leaks are found, the emissions are generally addressed quickly. However, curiously, final rule does not follow this same logic for gathering pipelines and does not exclude them from reporting emissions. Gathering pipelines are even more dispersed than transmission pipelines. They also operate at much lower pressure than transmission lines, resulting in lower potential for emissions. Requiring the reporting of emissions from gathering pipelines is a significant burden on the oil and gas industry in West Virginia, particularly considering the terrain of the state and the accessibility of these lines. For these reasons, WVONGA supports the comments filed by the GP A and recommends that gathering pipelines and flow lines be excluded from the reporting requirements.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1202-1
Organization: Enterprise Products
Commenter: Rodney Sartor

Comment Excerpt Text:

Gathering Lines - In the proposal to include gathering lines in Subpart W reporting, EPA has proposed to not report fugitive emissions from natural gas transmission pipelines due to the dispersed nature of the fugitive emissions and the fact that once leaks are found, the emissions are generally addressed quickly. This argument should also be applied to natural gas gathering pipelines for the following reasons:

- a. Gathering lines operate at much lower flow rates and pressures than transmission lines, resulting in a lower potential for emissions. Also, there are already programs in place to improve metering inspections and reduce gas emissions.
- b. We have not been allowed to fully evaluate the data that was used to create proposed emissions factors from pipelines (for comment); therefore, if the EPA requires some baseline of emissions sources on pipelines, we suggest only reporting gathering line mileage.

Gathering lines should be excluded completely from fugitive reporting for Subpart W. Adequate resources have not been utilized to fully determine if EPA emissions factors are representative of typical pipeline operations.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1206-15

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

GPA recommends that, consistent with treatment of transmission pipelines, gathering pipelines and flow lines be excluded from fugitive reporting due to the dispersed nature of the emissions and the impracticality of the requirements of proposed Subpart W.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1206-3

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

In addition, reporting for gathering lines will produce no useful information for EPA and would be inconsistent with EPA's treatment of interstate natural gas transmissions lines, which are not required to report (notwithstanding far greater throughput and operating pressures than typical gathering lines).

Response: EPA has not included gathering lines as an emissions source in today's final rule and hence the commenter's claim is now irrelevant. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1206-55

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

As explained in Section 2, above, GPA recommends that EPA exclude gathering pipelines from the emission inventory or provide very simplified calculation methods at the operator level for all gathering pipelines operated by an individual company.

Response: EPA has not included gathering lines as an emissions source in today's final rule. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1031-24

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

In addition to the conflicts created by the proposed definition in Part 98, Subpart W regarding applicability of gathering compression facilities, the following issues arise from the proposed Subpart W definition of Onshore Natural Gas Processing in §98.230(a)(3).

a) The proposed rule increases the number of facilities subject to Subpart C for combustion GHG emissions by approximately 15 times, with no consideration for the size of each individual facility. This results from the fact that, numerically, there are typically 10-20 gathering compression facilities for every gas processing plant.

b) Gathering compression facilities are often not uniquely associated with a single gas plant, and many gathering compression facilities have connections to multiple gas plants, where gas is routed to a plant based on business needs and conditions. Associating any one gathering compression facility to an individual processing plant is not always possible.

c) Rolling-up gathering compression facility emissions with processing plant emissions is in conflict with EPA's assessment of the impact of the proposed Subpart W. EPA inaccurately states in the proposed Subpart W preamble:

... [T]here are a reasonable number of reporters. Most natural gas processing facilities proposed for inclusion in this supplemental proposed rulemaking would already be required to report under subpart C and/or subpart NN of the Final MRR.

75 Fed. Reg. at 18616.

d) EPA makes the following conclusion in the preamble to the proposed Subpart W: ...[The rule would] requir[e] only a small fraction of total facilities to report.

75 Fed. Reg. at 18619.

The proposed Subpart W in fact increases coverage of gas gathering and processing facilities to nearly 100% regardless of facility size, which is unduly burdensome and neither reasonable nor appropriate.

e) Gathering compression facilities are typically small facilities and widely dispersed. Many of these compression facilities have only one or two compressors and may include treatment facilities, such as dehydration units. Significantly-sized facilities are already subject to Subpart C reporting if the combustion emissions exceed 25,000 metric tons per year ("tpy") and individual compression facilities that exceed 25,000 tpy, including Subpart W emissions, would also begin reporting as required. The proposed Subpart W, however, treats these small and widely dispersed facilities as if they are the same size and complexity of a gas processing plant. Examples of proposed requirements that may be appropriate for processing plants but unduly burdensome for small and widely dispersed gathering compression facilities include: collecting extensive data and modeling tank emissions, compressor rod packing vents, leak detection using optical imaging or population factors, and quarterly sampling of gas streams.

Anadarko also suggests that the same GHGs and sources reported by processing plants under § 98.232(d) be reported by gathering compression and treating facilities under the new source category.

Response: EPA has not included gathering lines and boosting stations as an emissions source in today's final rule at this time. For further information on this issue, please see Section II.F of the preamble for a response to this comment.

Comment Number: EPA-HQ-OAR-2009-0923-1074-16

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment: WBIH supports the use of population count of emission sources and population emission factors to estimate fugitive emissions for onshore petroleum and natural gas production facilities, only. As previously commented on, WBIH strongly requests the exclusion of fugitive emissions reporting for natural gas gathering pipelines

Response: Today's final rule uses population emission factors and counts of major equipment for estimating equipment leaks from onshore production. Please see Section II.F of the preamble. Also, as noted in Section II.F of the preamble, EPA will not require reporting of emissions from natural gas gathering pipelines at this time.

Comment Number: EPA-HQ-OAR-2009-0923-1004-11

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

EPA must do more to eliminate (or at least minimize) the use of direct measurement in the onshore petroleum and natural gas production sector. It is simply infeasible to carry out the detailed and labor-intensive reporting that the proposed Subpart W would demand at a sector with as many individual facilities and components as ours. At a minimum, EPA should specifically consider:

Creating a separate reporting category for gathering pipeline compression stations, and excluding gathering pipeline segments from reporting.

Response: Today's final rule uses population emission factors and major equipment counts for estimating equipment leaks from onshore production. Please see Section II.F of the preamble. EPA has not included gathering lines and boosting stations as an emissions source in today's final rule at this time. For further information on this issue please see Section II.F of the preamble for a response to this comment.

Comment Number: EPA-HQ-OAR-2009-0923-1026-8

Organization: Dominion Resources Services Inc.

Commenter: Pamela Faggert

Comment Excerpt Text:

Proposed Inventory Methodology for Distribution Sector

Natural gas distribution facilities are defined as " ... natural gas pipelines and metering and regulating stations that physically deliver natural gas to end users." As a general consideration, the safety of the natural gas distribution system is regulated by the Pipeline Safety Regulations of the Department of Transportation, in 49 CFR 192 which mandates inspection, leak repair, and integrity management. Natural gas in the distribution system is required to be odorized for the purpose of leak detection (49 CFR 192.625). The Mandatory Reporting Rule, Subpart W should not apply to odorized natural gas which is subject to the leak detection and repair requirements of the Department of Transportation, These requirements effectively limit emissions of odorized gas to an extent that they are a de minimis source; any measurement of leaking components would greatly overstate these emissions on an annualized basis because they are quickly detected, reported and repaired

The broad definition of the natural gas distribution sector would, by extension, require that each component throughout the system be counted and documented regardless of the size or location or leak potential even before determining if the "facility" meets the applicability threshold. With such a broad definition compounded by the very conservative emissions estimates that result from application of emission factors, almost all distribution systems would report regardless of size, Once in, almost all natural gas distribution utilities would have to estimate and report emissions for many small meter and regulator stations and city gate stations scattered throughout their service area, as well as combustion emission from sources that otherwise would not exceed the facility reporting threshold.

Generally, engineering estimates and emission factors provide a more workable approach for natural gas facilities. However, when this approach is applied to a distribution system that serves an entire state or region with hundreds of thousands, if not millions of customers, the initial task of developing and maintaining an inventory of components is excessively burdensome while not adding to the accuracy of the estimation of greenhouse gas emissions from this sector. In order to use this approach in the distribution sector, the regulated community would first have to conduct a physical inventory of every connector, block valve, control valve, pressure relief valve, orifice meter, regulator, and open-ended line in the system. Distribution companies do not normally maintain comprehensive equipment inventories of component parts. This task alone would be impossible to accomplish in the course of a year. These component counts would then be multiplied by emission factors that are not necessarily representative of losses from these components. The use of emission factors in the distribution sector for component parts, such as valves and connectors, greatly overstate emissions. These emission factors were developed for another purpose and were based on limited field work conducted nearly 20 years ago and do not reflect either current equipment or current practice. Much of the old cast iron and steel pipe used at that time has been replaced or lined with new plastic pipe which has significantly lower fugitive emissions.

Response: Leak Detection from Odorized Gas Systems

EPA does not agree that leak detection and quantification currently conducted at odorized gas facilities negates the need for today's rule, or that these facilities should be excluded from the today's final rule, nor does EPA agree that the leak detection and repair requirements of the Department of Transportation meet the requirements to inform public policy. EPA researched these DOT requirements and concluded that they target safety concerns rather than GHG emissions quantification, and therefore are insufficient for today's rule. Please refer to the rulemaking docket (EPA-HQ-OAR-2009-0923) under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements".

Facility Reporting Determination

EPA plans to provide screening tools that will assist LDCs determine whether or not they have to report before conducting any actual monitoring per today's final rule requirements. EPA does not agree with the commenter claim that almost all the LDCs will have to report to the rule. EPA through its threshold analysis has determined that only 143 of the 1,427 LDCs nationally, i.e. 10 percent of the total, will have to report under the rule.

Monitoring of M&R Stations

Regarding the issue of reporting emissions from many small meter and regulator (M&R) stations, EPA agrees that leak detection and measurement would be too burdensome, and so today's final rule requires only a count of non-customer M&R stations in below grade vaults and application of equipment leak factors. For custody transfer gate stations, today's final rule requires a leak survey once a year, and quantification of only those components found to be leaking using leaker factors which are derived from recent studies made in gas distribution gate stations. If, as this commenter claims, the DOT regulations and odorization of gas are very effective in controlling leaks, there should be very few, if any, leaks found and cost-effectively quantified using the leaker factors. Non-custody transfer city gate stations apply a company derived emission factor from the leak surveys of custody transfer gate stations, per meter run. EPA also agrees that small combustion sources should not be brought into the MRR in gas distribution. Hence, EPA does not require reporting of emissions from external combustion units that have heat capacity of 5 MMBtu per hour or lower; however, activity count has to be reported. Please see Section II.E of the preamble in today's final rule.

Emissions Factors

EPA does not agree with the commenter on the use of emissions factors for estimating emissions from LDCs. EPA is requiring the use of leak detection and leaker emissions factors. Hence, inventorying of all the components is not required; EPA has clarified this in today's final rule. Finally, EPA used the best publicly available data to develop emission factors for natural gas distribution facilities. Please see the response to EPA-HQ-OAR-2009-0923-0049-11.

Comment Number: EPA-HQ-OAR-2009-0923-1152-2

Organization: Consumer Energy Company

Commenter: Amy Kapuga

Comment Excerpt Text:

Local Distribution Should Be Excluded

A. Distribution Emissions Represent Less Than 1% of U.S. GHG Emissions - Based on Old Emission Factors That Overstate Emissions – Actual Emissions Are Even Lower Local distribution companies (LDCs) typically do not operate “facilities” that emit greater than 25,000 metric tons per year of greenhouse gases measured as carbon dioxide equivalents (CO₂e). Collectively, GHG fugitive emissions from natural gas distribution operations across the nation equal less than 0.5% of total U.S. GHG emissions.

The estimate of GHG emissions from gas distribution is based on emission factors developed over a decade ago by the Gas Research Institute (GRI) using data from testing a limited sample of equipment in work performed nearly 20 years ago. GRI developed the emission factors to facilitate a general estimate of nationwide methane emissions from gas distribution -- not for the purpose of estimating methane emissions from pipe and equipment used in an individual natural gas distribution system.

Since that time, Consumers has been steadily reducing methane leaks and tightening our distribution systems over the past decade and more through participation in EPA’s Natural Gas STAR program. In addition, through AGA, we are supporting the EPA and the Gas Technology Institute (GTI) (the successor to GRI) in ongoing joint research and field testing to develop updated, more accurate, emission factors. This work is not expected to be complete until 2012 or 2013 depending on funding availability. When these and other updated emission factors are available, it is very likely that we will find that the combined GHG emissions from natural gas distribution systems across the country are actually even lower than the current estimate.

EPA is proposing an expansive and novel definition of the term “facility” in this 2010 Proposal that would sweep in all the miles of gas mains and customer service lines, city gate stations, and (due to an unclear definition) potentially all customer meters across a state if they are within a distribution system served by a single LDC. Further, the agency is proposing to require annual leak surveys using scarce, costly and unnecessary optical scanning equipment that does not result in improved leak detection beyond the leak detection currently conducted by gas utilities under existing federal and state pipeline safety regulations. This proposal would impose billions of dollars in cost on gas utilities and their customers – rivaling costs under a cap and trade program – without reducing emissions. All this effort would provide no better picture of GHG emissions from this segment than is currently available in the annual EPA GHG Inventory, because LDCs would have to use outdated emission factors that tend to seriously overstate GHG emissions from natural gas distribution.

Consumers strongly opposes the addition of natural gas distribution to Subpart W reporting in the 2010 Proposal. We urge EPA to exclude natural gas distribution from Subpart W, or in the alternative to postpone or phase-in Subpart W for natural gas distribution to allow time to complete ongoing work to develop updated emission factors that better reflect the low emissions of modern, tight natural gas distribution systems.

Response: EPA does not agree with the commenter on the magnitude of emissions from LDCs being insignificant and thereby should be removed from today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1016-5 and EPA-HQ-OAR-2009-0923-1152-3 for further details.

EPA disagrees that emission factors were solely developed from the GRI reports. Please see response to comment EPA-HQ-OAR-2009-0923-1059-9. EPA used the best available public data to develop the emission factors and will consider updating factors as new data becomes available. EPA does not intend to postpone the finalization of today's final rule in anticipation of the results of these studies conducted by stakeholders. For further information please see the response to EPA-HQ-OAR-2009-0923-1299-5.

In today's final rule, the definition of facility, as it relates to natural gas distribution, has been clarified. Please see the response to EPA-HQ-OAR-2009-0923-1016-26 for further details. EPA never intended to require reporting for customer meters. Please see the Section III.B.2 for further details on this comment.

EPA agrees there is a prevalence of other methodologies for leak detection other than optical imaging cameras and has included several additional leak detection techniques including flame ionization detectors, catalytic oxidation/thermal conductivity detectors, and soap solutions as per Method 21. Please see Section II.F of the preamble for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1016-9

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

There is No Policy Need to Collect GHG Data from LDCs, as No Cap-And-Trade Proposal Would Apply to LDC System-Wide Emissions

Further, there is no policy need to collect GHG emissions data from the natural gas distribution sector. As a general principle, AGA supports gathering accurate emissions data, while minimizing administrative burden, to ensure an accurate accounting of each sector's emissions. This will help serve as the foundation for any sector-based allowance allocation under a future national cap-and-trade system for facilities that will likely be under such a system. However, this is not the case for natural gas distribution.

In all the major climate legislative proposals introduced in Congress, the proposed cap-and-trade system would be applied to the CO₂ emissions from combustion of natural gas by customers – not the distribution system itself. In these legislative proposals, natural gas local distribution companies (LDCs) would be directed to hold allowances to cover the emissions of their residential, commercial and small industrial customers related to the combustion of the natural gas delivered to the customers. This emissions data will be collected under Subpart NN of the 2009 MRR.

Under pending climate legislation, larger industrial facilities that emit greater than 25,000 metric tons per year (tpy) in GHG emissions measured as carbon dioxide (CO₂e) would be required to hold allowances for their own GHG emissions. The proposed climate legislation uses the normal concept of facility and source. If a natural gas LDC operates a “facility” that would emit greater than 25,000 tpy CO₂e, then the LDC would be required to hold allowances for such facility emissions. But there is no legislative proposal to require an LDC to hold allowances for system-wide GHG emissions. Nor is there likely to be such a proposal, given the minimal contribution of natural gas distribution system emissions to total U.S. GHG emissions.

Response: EPA notes that Subpart NN will not identify LDC process or combustion emissions that are required to be reported under today’s final rule. Subpart W requires the reporting of equipment leaks, vents and combustion from equipment sources in LDCs. Emissions reported under today’s final rule for LDCs will be process and equipment combustion emissions. Whereas those reported under Subpart NN are combustion emissions from products sold or delivered into the marketplace.

Commenter assumes that the underlying purpose of the MRR in collecting information is to implement future cap-and-trade legislation, as we pointed out in the 2009 MRR Response to Comments, Volume 9, Legal Issues to which the commenter is referred, there are myriad reasons supporting EPA’s authority and need to gather information under the rule. In the Advance Notice of Proposed Rulemaking Regulating Greenhouse Gas Emissions under the Clean Air Act, 74 Fed. Reg. 44354 (July 30, 2008) we articulated the various CAA provisions under which information gathered about GHGs would be relevant and useful. EPA estimates that natural gas distribution accounts for 6% of the total GHG emissions from the petroleum and natural gas industry. Please see Section II.B of the preamble to the April 2010 proposed rule. It is reasonable therefore for the Agency to collect GHG emissions information from LDCs to inform the Agency’s policy and understanding of GHG emissions under any number of those programs as well as to carry out its Congressional mandate. Further, to prognosticate what further climate legislation might provide or require and tailor this rule based thereon is inappropriate. EPA cannot nor is it authorized to base its rulemaking actions on pending, proposed, or anticipated legislation. Instead, today’s final rule is based on existing Congressional mandate and the policy need to collect information to inform Agency actions related to GHG whether by regulation or for purposes related to research and development activities. Please see Section I.C and Section II, Petroleum and Natural Gas Systems, of the preamble for more detail.

Comment Number: EPA-HQ-OAR-2009-0923-1016-10

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Natural gas distribution also should be excluded from Subpart W because significant methane leaks on our systems are detected and fixed promptly. In the preamble to the 2010 Proposal, EPA states that it is proposing to exempt natural gas transmission lines from the rule because leaks are

located and fixed quickly.³ However, the same is also true for all but the smallest leaks in distribution lines and equipment.

First, natural gas in distribution systems is required to be odorized to allow a person with a normal sense of smell to detect the presence of otherwise odorless methane at concentrations far below explosive levels. Our more than 65 million customers readily call their respective LDCs if they “smell gas.” LDCs maintain call centers to process these emergency leak calls and dispatch service personnel promptly to detect and repair leaks.

Second, as discussed in detail in section IV.C. of these comments, the Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) has promulgated regulations under Title 49 of the U.S. Code of Federal Regulations (CFR) that already require utilities to perform annual leak surveys of metering facilities in business districts and to perform periodic leak surveys of facilities in non business districts once every five years, as administered by individual state Public Utility Commissions (PUC). Many state PUCs have adopted more stringent regulations that require more frequent leak surveys in non-business districts. We have provided a chart in Exhibit A that shows examples of state PUC requirements for leaks surveys. This chart also includes web links to the relevant state PUC rules. The federal leak survey rules in 49 CFR §192.723 allows LDC’s to use the most effective equipment appropriate to the situation to detect the leaks in pipes and associated control equipment, such as regulator stations. These practices have been used for decades under the close scrutiny of the state PUCs and PHMSA.

Response: EPA has determined that distribution pipelines should be treated differently than transmission pipelines. Please refer to EPA-HQ-OAR-2009-0923-1099-14 for more information. EPA does not agree that odorized gas facilitates conducting leak detection should be excluded from today’s final rule, nor does EPA agree that the leak detection and repair requirements of the Department of Transportation meet the requirements to inform public policy. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under “Understanding the Substance of the DOT Regulations and Comparing them to the Subpart W Requirements” and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-0955-6
Organization: American Public Gas Association (APGA)
Commenter: Bert Kalisch

Comment Excerpt Text:

The Final Rule should eliminate from the count of Section 98.233(r) those LDC facilities that have been recently confirmed as not leaking.

As noted, all LDC facilities described in Section 98.232 (i)(2), (3), and (4) are by operation of Section 98.233 (r) deemed to be leaking for purposes of calculating emissions by such facilities.

³ 75 Fed. Reg. at 18616.

Yet, because LDCs conduct periodic leakage surveys, they are able to determine which of such facilities are leaking. Specifically, under PHMSA pipeline safety regulations found at 49 CFR 192.723, LDCs are required to conduct leakage surveys of their entire system including buried mains, services and M&R stations, both above and below ground. Piping located in business districts is required to be tested for leaks annually, while piping outside business districts are tested for leaks at least once every 5 years. Such surveys are performed with a variety of equipment such as hydrogen flame ionization units, combustible gas indicators and other detectors capable of detecting minute quantities of gas. The utility, therefore, will have information on how many mains, services and below ground M and R stations that were leak surveyed during the year are, in fact, leaking.

In light of the foregoing, APGA urges EPA to allow LDC operators the option to remove from the count used to calculate fugitive methane emission pursuant to Section 98.233(r) facilities that were leak surveyed during the year and found not to be leaking. Elimination of such facilities from the count will obviously provide a more accurate estimate of fugitive emissions and, hence, should be allowed.

Response: EPA disagrees with this comment. Leak detection must be performed at all facilities regardless of whether or not a leak detection survey was carried out the previous year and no emission sources are found to be leaking in previous surveys conducted according to PHMSA pipeline safety regulations (49 CFR 192.723). The purposes of PHMSA regulations are not the same as the data collection goals of today's final rule. If the facility has a minimal leaking emission sources as found in other surveys, then this should be reflected in leak detection surveys conducted to meet the requirements of today's final rule. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements" and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-1034-1

Organization: National Grid

Commenter: Alexandra G. Taft

Comment Excerpt Text:

We do, however, disagree with the approach the Agency has taken toward including LDCs. It is our view that LDCs should not be included in these regulations. The documenting of fugitive emissions is, in part, already conducted by the Agency (emissions associated with mains and services) and thus arguably adequately regulated and/or tabulated. As to the emission factors presently being used, we believe there is a real need for further study and updating. National Grid is currently participating in a funding effort for research being performed by the Operation Technology Development (OTD), a research consortium managed by the Gas Technology Institute (GTI), to improve the accuracy of the emission factor for plastic pipe.

Response: EPA does not agree with the commenter that the current activity data for several sources such as M&R stations are adequate. EPA is collecting new activity data through today's final rule, which is necessary to update existing information. EPA is interested in studies conducted by all stakeholders to improve emission factors and will consider updating factors as

deemed appropriate by the Agency. However, EPA does not intend to postpone the finalization of today's final rule in anticipation of the results of these studies.

Comment Number: EPA-HQ-OAR-2009-0923-1016-5

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Distribution Emissions Represent Less Than 1% of U.S. GHG Emissions - Based on Old Emission Factors That Overstate Emissions – Actual Emissions Are Even Lower

Natural gas distribution companies (LDCs) typically do not operate “facilities” that emit greater than 25,000 metric tons per year of greenhouse gases measured as carbon dioxide equivalents (CO₂e). Collectively, GHG fugitive emissions from natural gas distribution operations across the nation equal less than 0.5% of total U.S. GHG emissions.⁴

This estimate of GHG emissions from gas distribution is based on emission factors developed over a decade ago by the Gas Research Institute (GRI) using data from testing a limited sample of equipment in work performed nearly 20 years ago. GRI developed the emission factors to facilitate a general estimate of nationwide methane emissions from gas distribution -- not for the purpose of estimating methane emissions from pipe and equipment used in an individual natural gas distribution system.

Since that time, AGA member companies have been steadily reducing methane leaks and tightening their distribution systems over the past decade and more recently through voluntary participation in EPA's Natural Gas STAR program. In addition, AGA and its members are supporting an ongoing joint research and field testing program with EPA and the Gas Technology Institute (GTI) (the successor to GRI) to develop updated, more accurate methane emission factors to facilitate more accurate GHG emission estimates for plastic distribution pipe, metering and regulator (M&R) stations and other natural gas distribution equipment. Related work is also underway to develop improved emission factors for natural gas production and transmission in collaboration with EPA and other affected industry associations. This work is not expected to be complete until 2012 or 2013. When updated emission factors are available, it is very likely that we will find that the combined GHG emissions from natural gas distribution systems across the country are actually even lower than the current estimate of 0.43 percent of total U.S. GHG emissions. As noted in the EPA 2010 Inventory, “[distribution system CH₄ [methane] emissions in 2008 were 10.5 percent lower than 1990 levels.”⁵ This trend of declining fugitive emissions in distribution systems is expected to continue as LDCs continue to replace

⁴ This is based on emissions reported in the 2010 EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2008 (EPA 2010 Inventory EPA 2010 Inventory at page reports that natural gas distribution contributed 29.9 Tg CO₂e in 2008 and less than 0.05 Tg Co₂e in non-combustion CO₂ emissions. The total U.S.GHG emissions for 2008 were calculated to be 6956.8 Tg CO₂e. Thus natural gas distribution fugitive emissions contributed 0.43% of U.S. total greenhouse gas emissions in 2008 (29.9/6956.8 = 0.43).

⁵ EPA 2010 Inventory at page 3-44.

older pipe and equipment.

Response: EPA does not agree with the commenter on the exclusion of LDCs from reporting under today's final rule and has included reporting of emissions from LDCs in today's final rule. In developing this rule, EPA has considered oil and gas as one sector of the U.S. economy. This sector contributes significantly towards the total GHG emissions nationally. A continuous slicing and dicing of individual portions of the oil and gas industry will result in every subsector being a small portion of the national emissions and can be argued for an exemption. Rather than provide exclusions for entire segments and burdening other segments, to cover significant portions of the emissions nationally, EPA has provided relief by focusing on sources within each segment that contribute significantly to the segment emissions; see the decision tree process in the Technical Support Document in the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0027). Also, EPA has determined that some of the activity factors from the LDC segment that are available through the EPA National GHG Inventory, may not be reliable since it was collected over 15 years ago. Hence, through today's final rule, EPA deemed it important to collect reliable activity data from LDCs. Finally, EPA's threshold analysis indicates that only 143 distribution facilities of the total 1,427 LDCs nationally will be above 25,000 MtCO_{2e} per year, and therefore the reporting burden from the rule is reasonable. Hence, EPA has retained reporting of emissions from LDC in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1156-1

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

LDC fugitive emissions are minuscule compared to other source categories and should not be covered under subpart W:

Data from the EPA document "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2008" indicates that 2008 methane emissions nationwide, some 567 million metric tons or teragrams of carbon dioxide equivalent (TgCO_{2e}), are 8.2% of the nationwide total of 6,946 TgCO_{2e} emissions. The Natural Gas Systems sector, which includes LDCs, is responsible for 96.4 TgCO_{2e} or 1.4% of the nationwide total. LDC methane emissions account for 31% of this 1.4%, or just 0.43% of the national CO_{2e} emissions. Additionally, LDCs achieved a 10.5% reduction in methane emissions from 1990 to 2008 and continue to work to reduce methane emissions. The industry is already very much incentivized to minimize methane emissions, due to the economic value of natural gas and the potential safety issues associated with gas leaks. So, as an industry, we have substantially reduced methane emissions, and represent less than 0.5% of the national CO_{2e} emissions. Therefore, Laclede believes a fair cost/benefit analysis does not support requiring the reporting of LDC fugitive emissions.

Response: Concerning LDCs having an economic incentive to reduce emissions, LDC's meeting their lost and unaccounted for thresholds set by applicable regulatory agencies such as public utility commissions, have minimal if no incentive to further reduce emissions and therefore EPA can not simply assume that emissions are low. Through today's final rule, EPA is gathering

emissions data to help further understand possible policy considerations in this regard. For further information on why EPA has retained reporting requirements for LDCs, please see the response to EPA-HQ-OAR-2009-0923-1016-5.

Comment Number: EPA-HQ-OAR-2009-0923-1168-2

Organization: Delmarva Power a PHI Company

Commenter: Wesley L. McNealy

Comment Excerpt Text:

DPL requests that Natural Gas Local Distribution Company (LDC) systems be excluded from the scope of Subpart W. DPL believes such an exemption is appropriate because LDCs produce less than 1 % of US GHG emissions and continually upgrade their systems with tighter, more efficient equipment and materials. In addition, EPA's rationale for not requiring reporting of fugitive emissions from natural gas pipeline segments between compressor stations supports such an exemption because any LDC fugitive emissions similarly are dispersed in nature and once found are generally addressed quickly.

Response: For further information on why EPA has retained reporting requirements for LDCs, please see the response to EPA-HQ-OAR-2009-0923-1016-5. EPA does not agree that that distribution pipelines can be compared to transmission pipelines. Please refer to EPA-HQ-OAR-2009-0923-1099-14 for more information.

Comment Number: EPA-HQ-OAR-2009-0923-1059-5

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

MDU believes that the fugitive GHG emissions from the natural gas distribution sector are insignificant. The Energy and Information Administration reported that U.S. economy-wide energy and industrial sector CO₂ equivalent (CO₂e) GHG emissions in 2008 were 5,839.3 million metric tons. The EPA stated in the Subpart W Rule that the fugitive GHG emissions from the natural gas distribution source category are 6% (22.7 million tons of CO₂e) of the total emissions from the threshold category sources required to report emissions under Subpart W. The amount of GHG emissions from this specific sector is insignificant, at less than 0.4% of the total U.S. economy-wide annual GHG emissions.

Response: EPA has retained reporting requirements for LDCs, please see the response to EPA-HQ-OAR-2009-0923-1016-5.

Comment Number: EPA-HQ-OAR-2009-0923-1016-8

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Given the very low percentage of total US emissions represented by distribution systems, AGA strongly opposes the addition of natural gas distribution to Subpart W reporting in the 2010 Proposal. We urge EPA to exclude natural gas distribution from Subpart W, or in the alternative to postpone until 2016 to allow LDCs to complete a normal five year cycle of leak surveys (conducted under DOT regulations), or at least phase-in Subpart W for natural gas distribution to allow time to complete ongoing work to develop updated emission factors that better reflect the low emissions of modern, tight natural gas distribution systems.

Response: EPA has retained reporting requirements for LDCs, please see the response to EPA-HQ-OAR-2009-0923-1016-5.

Comment Number: EPA-HQ-OAR-2009-0923-1016-17

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

EPA Should Postpone or Phase-In Subpart W Pending Development of More Accurate Emission Factors

As we described above, AGA, EPA and GRI are currently working to develop new emission factors for natural gas production, transmission, LNG and underground storage and distribution equipment based on field testing that will not be completed until 2012 or 2013, depending on the availability of funding. This collaborative research effort is targeting the most inaccurate and highest priority emission factors, such as the emission factor for plastic pipe. That emission factor was based on only six data points collected nearly 20 years ago, one of which was a plastic pipe that had ruptured and was blowing natural gas. That type of rupture is repaired promptly and does not continue emitting natural gas from the distribution system at the same rate all year. Yet the existing plastic pipe emission factor makes that assumption. It makes no sense to impose a costly reporting requirement now that will necessarily require our members to divert resources to reporting emissions using old, inaccurate emission factors. Instead, EPA should postpone Subpart W for two years to allow the agency and AGA members to focus resources on expediting the work on developing updated, more accurate emission factors.

In the alternative, EPA should phase-in Subpart W as new emission factors become available for the sectors that will be subject to reporting under this Subpart. Distribution operations should be excluded, but if EPA declines to exclude distribution systems from Subpart W, then the EPA should allow the use of facility-level emission factors, with the reporting requirements phased-in once new facility-level emission factors are available in 2012 or 2013.

Response: EPA used the best available public data to develop the emission factors and will consider updating factors as new data becomes available. EPA does not intend to postpone the finalization of today's final rule in anticipation of the results of these studies conducted by stakeholders. For further information please see the response to EPA-HQ-OAR-2009-0923-1299-5.

EPA does not agree that the reporting of emissions from distribution pipelines is burdensome to the industry. LDCs know the material type and miles of pipeline in their systems. Reporting emissions from these sources for today's final rule is simply a matter of multiplying these pipeline miles by the corresponding emissions factors available from the rule. EPA retained this data reporting requirement such that emissions from this source are reported to EPA by each company respectively rather than at the aggregate level as is currently in the U.S. national inventory.

In today's final rule, EPA does not allow the phasing in of emissions reporting, however, under certain conditions allows the use of BMM. See Section II.F of the preamble to today's final rule for further details. EPA disagrees with the comment that facility level average emission factors should be used. For further details, please see the response to EPA-HQ-OAR-2009-0923-1011-19.

Comment Number: EPA-HQ-OAR-2009-0923-1059-13

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

In the Subpart W Rule, EPA determined that fugitive emissions from natural gas transmission pipeline systems are not required to be reported since leaks from high pressure systems are likely to be addressed quickly and MOU is in agreement with the EPA on this matter. The EPA should consider making a similar determination for LDC natural gas systems. Even though LDC natural gas systems usually operate at a lower pressure than transmission pipelines, LDCs are subject to pipeline integrity mandates and regulatory requirements through DOT as stated above, and have economic impacts from leaks similar to transmission pipeline companies, along with public safety consideration. These requirements encourage LDCs to address leaks quickly in natural gas distribution systems.

Natural gas in distribution systems is required to be odorized so that a person with normal smelling ability can detect the presence of otherwise odorless methane at concentrations far below explosive levels. Customers are educated periodically through mailings and instructed to call the LDC customer call center if they "smell gas" and the LDC dispatches service personnel immediately to investigate and repair leaks. MOU believes natural gas distribution systems should be excluded from the Subpart W Rule on a similar basis as natural gas transmission systems.

Response: EPA does not agree that LDCs should be treated the same as transmission pipelines. For further details, please see the response to EPA-HQ-OAR-2009-0923-1099-14.

EPA does not agree that odorized gas facilitates conduct leak detection and quantification should be excluded from today's final rule. EPA does not agree that the leak detection and repair requirements of the Department of Transportation meet the requirements to inform public policy regarding greenhouse gas emissions. For further details, please see rulemaking docket (EPA-HQ-

OAR-2009-0923) under “Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements” and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-1152-1

Organization: Consumer Energy Company

Commenter: Amy Kapuga

Comment Excerpt Text:

It is important in crafting the reporting rules in Subpart W not to lose sight of this important context for energy and environmental policy. When crafting GHG reporting rules, it is important that EPA not inadvertently impose barriers that could keep society from reaping the full benefit of using clean, efficient, abundant and domestic natural gas to reduce our nation’s carbon footprint. Greenhouse gas reporting rules should not create disincentives to lowering US GHG emissions by imposing unnecessary costs on the storage and distribution of natural gas to customers, thereby raising gas utility bills and discouraging the use of natural gas. Instead, sound public policy should encourage the efficient, direct use of natural gas by customers to reduce overall greenhouse gas emissions – especially in the near term until the electric power generation mix includes higher percentages of renewable energy.

Consumers generally supports the following changes in the 2010 proposed Subpart W:

- * Section 98.232 provides a list of specific Subpart W petroleum and natural gas segments and attempts to focus the reporting burden on primary GHG emission sources for each segment;
- * Direct measurement requirements have been reduced in favor of using engineering estimates and emission factors to better balance data quality and measurement burdens; and
- * Fugitive and vented emissions are now more clearly defined.

However, Consumers is alarmed that in this 2010 version of Subpart W, EPA is now proposing to require natural gas utilities to report GHG fugitive, vented and combustion emissions from their state-wide natural gas distribution systems.

For the reasons provided below, Consumers Energy urges EPA to delete natural gas distribution from the list of industry segments subject to Subpart W. However, if EPA retains distribution systems in the final rule, then Consumers urges EPA (1) to postpone applicability or otherwise phase-in Subpart W, and (2) to revise and clarify several provisions to facilitate implementation and compliance.

Response: EPA is retaining its reporting requirement for natural gas distribution in today's final rule. EPA determined that the burden associated with today’s final rule will have an insignificant impact on natural gas prices, and therefore will not discourage lowering GHG emissions or the use of natural gas. Please refer to today’s final rule rulemaking docket memo “Subpart W Greater Economic Impact” (EPA-HQ-OAR-2009-0923) for further details. EPA needs emissions data of reasonable quality from LDCs to inform future policy, and therefore exclusion

of LDCs from reporting to the rule at this stage in the public policy process is inconsistent with EPA's goals and the purpose of the reporting program.

EPA is not allowing for a phased in approach. However, EPA is allowing the use of best available monitoring methods under certain conditions. Please see the response to this comment in Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1156-5

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Odorized gas facilities should be exempt from subpart W:

At 49 CFR 192.723, natural gas for distribution must be odorized so that it is detectible by the human sense of smell at one fifth, or twenty percent, of the lower explosive limit, which equates to 0.9 percent gas in air. This is the minimum required level of odorization. Laclede, like many LDCs, adds a safety factor and odorizes to nearly twice the minimum limit, making gas odor detectible at 0.5 percent gas in air. This very low odor threshold obviates the measures contemplated in subpart W. Leaks involving odorized gas are located and repaired promptly. Consequently, all gas distribution facilities where odorized gas is being stored, transported and/or utilized should be exempt from regulation under subpart W. These include all types of buried and aboveground piping, M&R stations, and underground natural gas storage fields.

Response: EPA does not agree that odorized gas facilitates conduct leak detection and quantification should be excluded from today's final rule. EPA does not agree that the leak detection and repair requirements of the Department of Transportation meet the requirements to inform public policy regarding greenhouse gas emissions. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements" and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-1152-3

Organization: Consumer Energy Company

Commenter: Amy Kapuga

Comment Excerpt Text:

Natural gas distribution also should be excluded from Subpart W because significant methane leaks on our systems are detected and fixed promptly. In the preamble to the 2010 Proposal, EPA states that it is proposing to exempt natural gas transmission lines from the rule because leaks are located and fixed quickly.⁶ The same is true for distribution lines and equipment.

⁶ 75 Fed. Reg. at 18616.

First, natural gas in distribution systems is required to be odorized to allow a person with a normal sense of smell to detect the presence of otherwise odorless methane at concentrations far below explosive levels. Customers can readily call if they “smell gas.” Consumers maintains call centers to process these emergency leak calls and dispatch service personnel promptly to detect and repair leaks.

Response: EPA does not agree that LDCs should be treated the same as transmission pipelines. For further details, please see the response to EPA-HQ-OAR-2009-0923-1099-14. EPA does not agree that odorized gas facilitates conduct leak detection and quantification should be excluded from today’s final rule. EPA does not agree that the leak detection and repair requirements of the Department of Transportation meet the requirements to inform public policy regarding greenhouse gas emissions. For further details, please see rulemaking docket (EPA-HQ-OAR-2009-0923) under “Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements” and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-1009-5

Organization: Xcel Energy Inc.

Commenter: Eldon Lindt

Comment Excerpt Text:

The emission calculation from leaks (Eq. W-18) is based on operations for the entire year. A leak that has been occurring for one day will result in the same reported value as one that has occurred for an entire year. At the very least, reporters should be allowed, but not required, to calculate emissions based on multiple leak detection surveys in order to more accurately reflect leakage and account for repairs. EPA and industry partners are also currently performing joint research to update existing emission factors to better reflect current system conditions. However, the proposed rule will divert resources away from this task and delay the development of factors that more accurately characterize emissions from natural gas systems. The proposed rule’s complexity will make it very difficult to identify and schedule the necessary resources to support reporting. Therefore, Xcel Energy supports AGA’s proposal for either excluding local distribution companies from the Subpart W requirements or delaying Subpart W’s implementation until joint development of new emission factors for natural gas systems is completed.

Response: EPA agrees to allow multiple leak detection surveys; please see the response to EPA-HQ-OAR-2009-0923-1014-9 for further details. EPA fully supports studies conducted by all stakeholders to improve emission factors. EPA disagrees that natural gas distribution should be excluded from today’s final rule or it should postpone the finalization of today’s final rule in anticipation of the results of these studies. Please see reponse to EPA-HQ-OAR-2009-0923-1299-5. Today’s final rule has been further simplified and clarified to ensure minimal burden on LDCs to report emissions. Please see Section II.E and II.F of the preamble to this rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1016-18

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

If EPA Does Not Exclude LDCs, Then Revise Subpart W to Use Better, More Cost-Effective Ways to Estimate Fugitive Greenhouse Gas Emissions from Local Distribution Systems

Miles of Gas Main and Service Lines Reported to DOT

EPA should omit from the final Subpart W rule the requirement to report fugitive emissions from distribution piping, because this information is already available to EPA in EPA's annual GHG Inventory. Each year, LDCs report their miles of different types of natural gas mains (cast iron, steel, plastic pipe) and service lines to the Department of Transportation (DOT) as well as the number and types of leaks on DOT Form PHMSA F 7100.1-1 (12-05) Form Approved OMB No. 2137-0522. EPA then calculates the fugitive methane emissions by multiplying the miles of pipe times the appropriate emission factor. There is no need to duplicate this effort.

Response: EPA retained the pipeline data reporting requirement such that emissions from this source are reported to EPA by each company respectively rather than at the aggregate level as is currently in the U.S. national inventory. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements".

Comment Number: EPA-HQ-OAR-2009-0923-1306-2

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

Despite these positive changes, DTE Energy is concerned about the addition of natural gas distribution as an industry segment that must report GHG emissions under the revised proposed Subpart W.

Response Please see the response to EPA-HQ-OAR-2009-0923-1016-5.

Comment Number: EPA-HQ-OAR-2009-0923-1306-8

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

DTE Energy requests that EPA remove natural gas distribution from the list of industry segments that are required to report GHG emissions under Subpart W of the proposed rule.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1016-5.

Comment Number: EPA-HQ-OAR-2009-0923-1099-14

Organization: New Mexico Gas Company

Commenter: Curtis J. Winner

Comment Excerpt Text:

The revised Subpart W Greenhouse gas reporting rule for petroleum and natural gas systems includes natural gas distribution systems. Having to report fugitive emissions from the distribution system would be an additional burden on Local Distribution Companies (LDCs) which are also required to report emissions from gas delivered to end users (Subpart NN). LDCs often have distribution service territories in multiple areas within a state or in more than one state that may be hundreds of miles apart. The task of measuring leaks from the distribution system from all areas operated by an LDC would be a time consuming task. NMGC feels that the distribution system should be treated the same as transmission pipelines and not be required to report fugitive emissions. Fugitive emissions from the distribution system tend to be dispersed and fixed quickly once discovered.

Response: EPA agrees that measuring leaks from distribution systems in all areas operated by LDCs would not be cost-effective. Today's final rule requires no measurement of leaks, but rather leak detection surveys only in custody transfer city gate stations, and quantification of emissions using leaker factors. EPA also made it clear in today's final rule that no customer meter/regulator needs to be reported, only a count of underground M&R stations. M&R stations in non-custody transfer city gate stations apply a company derived emission factor per meter run, using the emissions data collected for the custody transfer gate stations.

EPA chose only large emissions sources within each segment of the oil and gas industry (explained in Section 4.c.ii of the Technical Support Document (TSD)) and determined what emissions sources should be required to report. Using this guidance EPA determined that transmission pipelines are a relatively small percentage of transmission-sector methane emissions, whereas the LDC pipelines are a large percentage of LDC emissions and therefore EPA deems it necessary to collect this data. See Appendix A of the TSD found in docket (EPA-HQ-OAR-2009-0923); for further details. Finally, EPA only requires the use of emissions factors to estimate emissions from LDC pipelines, the activity data for which the LDCs already have. Hence, the resultant burden to report emissions is reasonable.

Comment Number: EPA-HQ-OAR-2009-0923-1065-2

Organization: The Clean Energy Group

Commenter: Michael Bradley

Comment Excerpt Text:

However, in addition to the facilities included in the initial proposal, this proposed rule would require reporting from natural gas distribution facilities. This reporting requirement would be in addition to the requirements local distribution companies (LDCs) already must comply with under Subpart NN–Natural Gas and Natural Gas Liquids.

The Clean Energy Group contends that the proposed requirements for LDCs to measure and report fugitive emissions would result in significant cost and administrative burdens and should be reconsidered. The Clean Energy Group recommends that EPA delay finalizing the natural gas LDC portion of Subpart W and work with the industry to identify a more reasonable approach.

Response: EPA disagrees that the reporting requirements of Subpart NN meet the requirements of Subpart W. Please see the response to EPA-HQ-OAR-2009-0923-1016-9. Concerning costs, there was misinterpretation regarding the level of reporting proposed by EPA which lead commenters to believe the reporting burden would be much higher for LDC's. Please see the Section III.B.2 of the preamble for further details on this comment. Leak detection is not required at all of the meter and regulator station in today's final rule. Leak detection is only required for above grade metering and regulating stations (also called "gate stations") at which custody transfer occurs. For further details, please see Section II.F of the preamble to today's final rule for further detail. Also, please see Section 4 and 5 of the Economic Impact Analysis (EPA-HQ-OAR-2009-0923) for further information related LDC cost impacts.

Comment Number: EPA-HQ-OAR-2009-0923-1156-8

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Therefore, Laclede recommends that EPA reconsider and abandon the approach of requiring LDCs to engage in applying a limited set of emission factors to the very broad spectrum of gas distribution facilities across the country. The present methods that EPA employs to estimate macro-level methane emissions for this and other industry sectors appear sufficient for EPA to annually publish its nationwide Greenhouse Gas Inventory. As discussed above, distribution operations should be excluded from subpart W, but if EPA does include distribution systems, then the implementation of reporting requirements should be timed to allow the use of new emission factors that will result from the ongoing joint research and field testing program of the EPA and the Gas Technology Institute.

Response: EPA disagrees with the commenter on the use of existing EPA National Inventory methods for estimating emissions from LDC facilities. The National Inventory provides a national estimate that cannot be reasonably apportioned to individual facilities; EPA seeks individual facility level information to inform policy. For these reasons, EPA has retained the requirement for LDCs to conduct limited monitoring to inform policy without undue burden on the industry. Regarding the use of updated emissions factors and delaying inclusion or excluding LDCs from today's final rule, please see response to comment EPA-HQ-OAR-2009-0923-1016-17 and EPA-HQ-OAR-2009-0923-1299-5.

Comment Number: EPA-HQ-OAR-2009-0923-1045-3

Organization: FLIR Systems, Inc.

Commenter: Thomas J. Scanlon

Comment Excerpt Text:

Impact on Local Distribution Companies

Several commenters have indicated that the proposed Subpart W will place an onerous burden on local distribution companies (LDCs), with a financial impact as great as \$4,000,000 per LDC. While we agree that the coverage of LDC systems under Subpart W is in need of clarification, we do not believe that EPA intended the coverage of LDC systems to be as sweeping as these commenters suggest, and believe that EPA can proceed to require OGI for emission detection at city gate stations and above ground district regulators. In addition, we believe it is advisable for EPA to require OGI emission detection at certain underground pipeline main facilities and large customer metering and regulating stations, albeit on a “phased in” timetable.

1. Proposed LDC Coverage of Subpart W is Manageable and Cost-Effective. Although the proposed definition of LDC facilities, which refers broadly to “above ground meter regulators and gate stations,”⁷ is ambiguous, we do not believe EPA intended for the proposed Subpart W to have such broad coverage as to impose an OGI inspection requirement on residential meters and small commercial establishments. As EPA explains in the preamble to the proposed rule:

“Distribution system CH₄ and CO₂ emissions result mainly from fugitive emissions from above ground gate stations (metering and regulating stations), below grade vaults (regulator stations), and fugitive emissions from buried pipelines.”⁸

EPA’s view that gate stations, below grade regulator stations, and buried pipelines are the main contributors to GHG emissions from LDC systems is supported by the data provided in Appendix A of the Technical Support Document accompanying the proposed rule. The TSD, and the preamble, do not mention requiring OGI detection or emission factor estimates for any customer-specific metering facilities.

Assuming that EPA intended for Subpart W to have this more limited scope, we believe that the proposed rule could be easily implemented at reasonable cost. Based on our inquiries with a local distribution company serving a large city in the Northeast, the number of above-ground city gates and district regulator stations should be manageable even for a large metropolitan area. The utility we consulted has 20 city gate terminals which meter and reduce the pressure from transmission pipeline(s). The utility also has 150 district regulators which operate downstream from the city gate terminals and reduce pressure and re-distribute the gas to the lower pressure gas distribution system. These stations are housed in underground spaces, underground manhole vaults and in small above ground buildings and sometimes within the gate station itself. The system in our survey has only 6 district regulators below ground.

⁷ Proposed 40 C.F.R. § 98.230(a)(8).

⁸ 75 Fed. Reg. at 18,617.

Response: Leak detection is not required at all of the meter and regulator station in today's final rule. For further information on this issue please see Section II.F of the preamble to today's final rule. EPA agrees with the commenter that today's final rule, in which EPA's intentions are clarified for meter and regulator stations, can be implemented at a reasonable cost. Further information related to the cost impact on LDC's can be found in Section 4 and 5 of the Economic Impact Analysis (EPA-HQ-OAR-2009-0923).

EPA has reviewed other methodologies for leak detection. Please see Section II, Petroleum and Natural Gas Systems, of the preamble for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1004-2

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

The Inclusion of Onshore Natural Gas Production in the Mandatory Reporting Rule is Unnecessary to Achieve EPA's Goals

Including the onshore natural gas production sector in the Mandatory Reporting Rule will not contribute significantly to the coverage of EPA's reporting requirements and will not further the industry's considerable efforts to minimize GHG emissions. As EPA itself determined, the existing Mandatory Reporting Rule already captures approximately 85 percent of U.S. GHG emissions. Even under EPA's revised emission figures (which NGSA has not had an opportunity to independently evaluate), onshore petroleum and natural gas production as a whole only account for approximately 3 percent of U.S. emissions. On balance, NGSA questions whether this level of added contribution of our sector to total U.S. GHG emissions justifies the considerable cost and logistical issues associated with implementing the proposed Subpart W – costs which, as discussed in more detail below, EPA may have significantly underestimated.

The conclusion that the proposed Subpart W is unnecessary for our sector is only bolstered by the demonstrated effectiveness of a number of existing voluntary programs undertaken by the natural gas industry to monitor and – more important – reduce GHG emissions from natural gas facilities. NGSA members have participated in these programs not simply for environmental reasons but also because, in the case of methane, fugitive emissions represent losses of a valuable product. Natural gas producers have always had a powerful economic incentive to take cost-effective measures to detect and prevent releases of methane where possible. This incentive explains why the natural gas industry has consistently participated in voluntary initiatives such as EPA's Natural Gas STAR program, which has eliminated nearly 822 billion cubic feet (Bcf) of domestic methane emissions since 1993. Of this total, over half – 416 Bcf – resulted from activities in the onshore petroleum and natural gas production sector. In 2008 alone, Natural Gas STAR partners reduced methane emissions by 114 Bcf, with the vast majority of that total (78 percent) attributable to the production sector.

In addition to Natural Gas STAR, NGSAs members have voluntarily taken part in reporting efforts such as the Carbon Disclosure Project, the Climate Registry, American Carbon Registry, and the API Climate Greenhouse Gas Estimation and Reporting program. These efforts have greatly contributed to public understanding of the nature and magnitude of GHG emissions from our facilities, at very reasonable cost.

Response: Inclusion of onshore natural gas production in this rule is consistent with EPA's goal of establishing an economy-wide mandatory reporting program. EPA does not agree with the commenter that the contribution of emissions from onshore production is insignificant. In fact, onshore production is the largest contributor of emissions from the oil and gas industry, responsible for over 50% of emissions from the oil and gas industry and the oil and gas industry as a whole is second largest GHG emitting industry, behind only power production, in the mandatory reporting rule. Hence, EPA does not consider the greenhouse gas contribution of this industry as insignificant and has retained the requirement for onshore production and the other segments of the oil and gas industry to report in today's final rule.

EPA appreciates the participation of the Partners in the Natural Gas STAR Program and steps taken by them to reduce emissions. However, EPA would like to note that the fact that Natural Gas STAR has seen such large reduction is indicative of the large potential emissions still not captured as a part of the Program. In fact, the Program has seen reductions that are greater than the emissions estimated by the EPA National Inventory, such as in the case of well venting sources. And these reductions were a result of emissions reduction efforts from a small portion of the industry, again indicative of large emissions from other operators who have not taken similar steps to reduce emissions. Overall, EPA does not have a good characterization of emissions from onshore petroleum and natural gas production and EPA analysis indicates that the emissions could be significantly larger than the EPA National Inventory Estimates. Therefore, emissions information from the onshore production segment is critical in informing policy. Also, the Gas STAR Program measures reductions, not emissions and therefore the data gathered by the Gas STAR Program is not relevant to the goals of today's final rule.

EPA has reviewed existing program and regulations and found them to be inadequate in characterizing emissions from onshore production. In fact, most of the programs and studies use the same inaccurate oil and gas production sector factors from the EPA National Inventory to estimate emissions. Hence, EPA has determined that better monitoring methods are required in some cases to adequately characterize emissions, which is why EPA is retaining reporting from onshore production in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1031-19

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

Reporting of combustion under Subpart C. The reporting all of combustion under Subpart C for Onshore Petroleum and Natural Gas Production is overly burdensome. As written, small heaters and wellhead compressors would have to comply with the fuel measurement

and QA/QC requirements of this subpart. As the EPA is aware, most of the fuel for dispersed wellhead combustion equipment is un-metered. Anadarko would recommend that combustion at Onshore Petroleum and Natural Gas Production be exempted from the reporting under Subpart C, and a more simplistic method of quantification be used for these sources under Subpart W.

Response: EPA has moved all reporting of combustion emissions from onshore production into Subpart W. Furthermore, in today's final rule, EPA has provided a threshold for external combustion equipment. Please see Section II.F of the preamble to today's final rule for further details.

The EPA has also made clarifications about any conflicts for combustion emissions between Subparts C and W. For further details, please see the response to EPA-HQ-OAR-2009-0923-1060-27.

Comment Number: EMAIL-0001-6 (comment also located in rulemaking memo "Early Comment Submissions" in docket EPA-HQ-OAR-2009-0923)

Organization: American Exploration and Production Council

Commenter:

Comment Excerpt Text:

Emissions from Portable Non-self-propelled Equipment (such as well drilling and completion equipment, workover equipment, gravity separation equipment, auxiliary non-transportation related equipment).

EPA should delete the reporting of emissions from these non-stationary and portable sources. EPA should simply use its own updated total emissions estimates for these sources. The huge added expense for industry to calculate, keep records, and report emissions from thousands of these sources is not justified by the small incremental emissions reporting accuracy EPA may be expecting from this approach. More specifically:

- Most wells are drilled and completed using contract service companies. EPA underestimates the difficulty of tracking equipment and estimating emissions from field portable equipment that are operated by third parties even when stationed at a well site for more than 30 days. Complying with this requirement as proposed would be very resource intensive and complex since this equipment is often moved from well to well and between operators. In many cases, site operators would not have the operational data to perform the needed calculations and/or the necessary records to certify the accuracy of GHG emissions data. When the well site operator does not control the operation or maintenance of the equipment, it is not appropriate to require reporting and compliance tasks of the well site operator because they do not participate in engine maintenance or the collection of fuel use data. All other Clean Air Act programs establish applicability based on whether a party owns and/or operates a source because it is not feasible for someone who does not control the day-to-day operation of a source to collect the required information or monitor the source's usage. Is any other industry sector required to report contractor's emissions for this reporting rule?

- All of these activities are non-stationary source and temporary construction activities that should be excluded just as other construction activities (housing, commercial building, roadways, etc) are excluded. Requiring estimates of these emissions greatly increases the reporting burden on the oil and gas industry without a corresponding increase in emissions reporting coverage. For instance, even using updated methodology from its Natural Gas Star work, EPA estimated that emissions from well completions would only represent 0.0004% and that emissions from well workovers would only represent 0.04% of the 80% of fugitive and vented emissions from the onshore production sector (see Appendix A & B: Greenhouse Gas Emissions Reporting from the Petroleum and Natural Gas Industry). As noted in Appendix A, EPA over rode its own decision tree process when including these sources that amount to such a miniscule part of emissions.
- The total number and type of wells completed in the U.S. is well known; therefore, EPA could easily obtain a reasonable estimate of those GHG emissions using the Natural Gas STAR data mentioned above. EPA could then add-on the emissions estimates for drilling and completing wells to the inventory.
- The vast majority of engines included in this category are fired by diesel fuel. Emissions from these non-road engines are exempt from reporting under Subpart C. Reporting GHG emissions from these engines under Subpart W would result in double counting of emissions since emissions from the combustion of diesel fuel are reported by suppliers of petroleum products under Subpart MM.

Response: EPA disagrees with the commenter on emissions from portable equipment. The emissions contribution from portable equipment is significant enough to warrant data collection. Please see the response to EPA-HQ-OAR-2009-0923-1024-23 for further details. For further details on EPA's legal authority to require reporting of contractor emissions, please see the response to EPA-HQ-OAR-2009-0923-1031-21.

EPA agrees that the 30-day at well site requirement will be difficult to implement and has removed that requirement in today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1170-7 for further details.

EPA does not agree with the commenter on the emissions from well completions and workovers. The commenter has misinterpreted EPA's analysis. The 0.0004% and 0.04% emissions from well completions and workovers, respectively are in Appendix A of the TSD as available from the National Inventory. EPA has determined that these source emissions estimates are significantly underestimated and hence provided new estimates in Appendix B, where well completion and well workovers account for 9 percent and 3 percent of emissions from onshore production. Hence, these sources have been retained in today's final rule.

Regarding the use of national inventory to estimate emissions, EPA agrees that the activity factor could be reasonable, but the issue lies in the emissions factors currently being used. Since these emissions factors are unreliable, EPA requires reporters to use monitoring methods that will provide data that have an adequate level of accuracy to inform policy.

Regarding the double counting of emissions with Subpart MM, EPA has done this intentionally. Please see the response to EPA-HQ-OAR-2009-0923-1042-26 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1298-28

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

In addition, a portable source is not required to be included in the emissions inventory unless it is stationed at a wellhead for more than a certain amount of time. However, it is not clear whether the portable source must be recording the pertinent data from its first day of operation in the unlikely event it exceeds the allotted amount of time at one location. IPAMS requests that this requirement clearly state that if a portable source exceeds the allotted amount of time at one wellhead location, the owner or operator must begin complying with the applicable requirements of this rule on the following day, including tracking of fuel consumption for calculating emissions.

IPAMS also requests that the time period be extended from 30 days to 90 days. This is a reasonable period given that many states consider these types of source to be sufficiently insignificant not to warrant permitting or registration, and for those few states that do have requirements for such equipment (e.g., Colorado) the period begins at 6 months.

Response: EPA disagrees with the comment. It is the reporter's responsibility to determine if their operations will or may exceed the 25,000 threshold and report all emissions as stipulated in subpart W and other applicable subparts. EPA intends to provide applicability screening tools to assist companies in threshold determination. Owners or operators that emit 25,000 tons per year in emissions from all sources in a basin, including portable equipment, must report under subpart W. EPA disagrees with the commenter that the time period for portable equipment should be extended from 30 to 90 days as many major emissions sources, such as drill rigs, are on site for far less than 90 days. Most rigs typically complete wells in less than even the proposed 30 day period in many cases. Providing a 90 day limit would mean excluding virtually all drilling operations from reporting. However, drilling operations are the largest source of combustion emissions in onshore production and EPA therefore must gather data on those emissions in order to inform policy. EPA also received comments that major emissions sources are on site for less than 30 days and therefore in today's final rule removed the 30-day at wellhead clause to avoid practical issues with determining the time the portable equipment is at the wellhead and capture these emissions sources. Please see the response to EPA-HQ-OAR-2009-0923-1170-7 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1010-5

Organization: Oklahoma Independent Petroleum Association

Commenter: Burckhalter

Comment Excerpt Text:

Portable non-self propelled equipment such as drilling and completion equipment should not be included in the proposed rule. Oil and gas operators should not be required to collect and report this type of information. Operators contract with service companies to drill and complete their wells. The equipment used for these types of activities is not owned or controlled by the operator of the well, nor does the operator of the well have detailed information on the types of equipment used in these activities. The requirement for the operator of the well to collect and submit such data is unreasonable and inappropriate, not to mention very costly and burdensome. EPA should remove this requirement from the proposed rule.

Response: EPA disagrees with the exclusion of portable equipment from today's final rule. For further details, please see Section II.F of the preamble and the responses to EPA-HQ-OAR-2009-0923-1170-7. For details on EPA's legal authority to require reporting of contractor emissions, please see the response to EPA-HQ-OAR-2009-0923-1031-21.

Comment Number: EPA-HQ-OAR-2009-0923-1031-20

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

Emissions from portable non-self-propelled equipment (such as well drilling and completion equipment, workover equipment, gravity separation equipment, auxiliary non-transportation related equipment) do not need to be reported. EPA should delete the reporting of emissions from these non-stationary and portable sources. EPA should simply use its own updated total emissions estimates for these sources. The huge added expense for industry to calculate, keep records, and report emissions from thousands of these temporary sources is not justified by the small incremental emissions reporting accuracy EPA may be expecting from this approach.

Response: EPA disagrees with the commenter on emissions from portable equipment. Please see Section II.F of the preamble and the response to EPA-HQ-OAR-2009-0923-1170-7 for further details. For details on EPA's legal authority to require reporting of contractor emissions, please see the response to EPA-HQ-OAR-2009-0923-1031-21.

Comment Number: EPA-HQ-OAR-2009-0923-1057-1

Organization:

Commenter: Michael Leonard

Comment Excerpt Text:

Subpart C excludes portable and emergency equipment, while the proposed Subpart W includes portable equipment that has been on-site for 30 days or more. We propose that both subparts be modified to include consistent language relative to portable and emergency equipment

Response: In today’s final rule, reporters must estimate emissions from portable equipment regardless of how long they have been on-site. For more information on this issue, please refer to response EPA-HQ-OAR-2009-0923-1170-7.

The EPA has also made clarifications about any differences of potential inconsistencies for combustion emissions between Subparts C and W. For further details, please see the response to EPA-HQ-OAR-2009-0923-1060-27. For additional information on reasons why EPA included portable equipment, please see response to Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1031-22

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

All of these activities are non-stationary source and temporary construction activities that should be excluded just as other construction activities (housing, commercial building, roadways, etc) are excluded. Requiring estimates of these emissions greatly increases the reporting burden on the oil and gas industry without a corresponding increase in emissions reporting coverage. The total number and type of wells completed in the U.S. is well known; therefore, EPA could easily obtain a reasonable estimate of those GHG emissions using the Natural Gas STAR data mentioned above. EPA could then add-on the emissions estimates for drilling and completing wells to the inventory.

Response: EPA disagrees with the commenter on emissions from portable equipment. Please see Section II.F of the preamble and the response to EPA-HQ-OAR-2009-0923-1170-7 for further details.

EPA disagrees on using the Natural Gas STAR data to estimate GHG emissions for this source. For further details, please see the response to EMAIL-0001-6 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1167-18

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

The “Portable Equipment Combustion Emissions” emission source is unnecessary and should be removed from all reporting requirements.

* Noble proposes that the EPA delete the portable non-self propelled equipment from the proposed definition of onshore petroleum and natural gas production and from all reporting requirements. Noble Energy supports comments on this issue submitted by AXPC and API. Portable Equipment Combustion Emissions reporting should not be required for onshore producers. This is because portable combustion equipment GHG emissions are predominately from diesel-powered drilling rigs operated by third parties, and well owner/operators would not maintain the equipment, control the day-to-day operation, or have ready access to the fuel

consumption data required for reporting. Collecting the fuel use data would be very resource intensive and complex because an owner/operator often employs numerous drilling rig operators and drilling rig equipment is moved from well to well. In addition, diesel fuel use combustion is already reported under Subpart MM. In summary, MMR by onshore petroleum and natural gas production for portable non-self propelled equipment is unprecedented, results in double counting, and is impractical for portable sources outside of a reporting entity's operational control; and is thus unduly burdensome.

Response: EPA disagrees with the exclusion of portable non –self propelled equipment from today's final rule. In today's final rule, EPA has provided a threshold for external combustion equipment. For further details, please see Section II.F of the preamble and the response to EPA-HQ-OAR-2009-0923-1170-7.

EPA disagrees that data cannot be obtained from the contractor who understands and knows where the equipment is at any given point in time and also tracks the volume of fuel consumed. Please see the responses to EPA-HQ-OAR-2009-0923-1170-7 for further details. For details on EPA's legal authority to require reporting of contractor emissions, please see the response to EPA-HQ-OAR-2009-0923-1031-21.

With regards to the double counting of emissions with Subpart MM, EPA has done this intentionally. Please see the response to EPA-HQ-OAR-2009-0923-1042-26 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1206-65

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

This requirement states that an operator must report emissions separately for portable equipment for the following source types: drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters. However, EPA specifically exempts portable equipment from the definition of the stationary fuel combustion source category in Subpart C of the rule. It is inconsistent and burdensome to require the inclusion of portable sources for the petroleum and natural gas systems subject to Subpart W. We request that EPA remove this requirement.

Response: EPA disagrees with the exclusion of portable non –self propelled equipment from today's final rule. In today's final rule, EPA has provided a threshold for external combustion equipment. For further details, please see Section II.F of the preamble and the response to EPA-HQ-OAR-2009-0923-1170-7.

The EPA has also made clarifications about any conflicts and potential inconsistencies in reporting of combustion emissions between Subparts C and W. For further details, please see the response to EPA-HQ-OAR-2009-0923-1060-27.

Comment Number: EPA-HQ-OAR-2009-0923-1298-27

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.231(b): This part states, “For applying the threshold defined in Section 98.2(a)(2), you must include combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.”

As discussed in the comment for Section 98.230(a)(2), in cases where the well site operator contracts drilling rigs from a third-party company, it is not practicable for the well site operator to collect the required information or control the source’s usage. IPAMS requests that EPA clearly state in this part that only equipment that a party owns and/or operates must be included in that party’s emissions reporting inventory.

Response: In today’s final rule, EPA has retained reporting of emissions from portable equipment. EPA disagrees that data cannot be obtained from the contractor. Please see Section II.F of the preamble and the response to EPA-HQ-OAR-2009-0923-1170-7 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1298-49

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(b): This requirement states that an operator must report emissions separately for standby equipment. The term “standby equipment” is not defined in this part. Moreover, companies do not typically designate units as primary or standby, so they do not have the means to separate emissions for standby units. The emissions from all units, whether primary or standby, will be calculated and reported based on the methods provided in this part. IPAMS requests that EPA remove this requirement.

Response: EPA has determined that most reporters understand the term standby with regard to compressors. Please see the response to EPA-HQ-OAR-2009-0923-1206-59. EPA is retaining reporting from standby equipment for compressors in today’s final rule. For further information, please see the response to EPA-HQ-OAR-2009-0923-1080-37.

Comment Number: EPA-HQ-OAR-2009-0923-1298-54

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(f): This requirement states that an operator must report emissions separately for

portable equipment for the following source types: drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters. EPA specifically exempts portable equipment from the definition of the stationary fuel combustion source category in Subpart C of the rule, and it is inconsistent and burdensome to require the inclusion of portable sources for the petroleum and natural gas systems subject to Subpart W. IPAMS strongly opposes the requirement to report the emissions from non-stationary and portable sources, especially well drilling rigs and ancillary equipment for well completions and workovers.

Response: EPA disagrees with the exclusion of portable non –self propelled equipment from today’s final rule. In today’s final rule, EPA has provided a threshold for external combustion equipment. For further details, please see Section II.F of the preamble.

The EPA has also made clarifications about any conflicts for combustion emissions between Subparts C and W. For further details, please see the response to EPA-HQ-OAR-2009-0923-1060-27.

Comment Number: EPA-HQ-OAR-2009-0923-1298-73

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Likewise, IPAMS requests that EPA delete reporting for portable equipment combustion emissions under Section 98.234(z), which currently requires calculating emissions from portable equipment using the Tier 1 methodology described in Subpart C, for the same reasons.

If an exclusion cannot be provided for combustion sources, IPAMS requests that reporters be allowed to use engineering estimates for the reporting area in lieu of the Subpart C Tier 1 methodology which requires fuel measurement.

Response: EPA disagrees with the exclusion of portable non –self propelled equipment from today’s final rule. In today’s final rule, EPA has provided a threshold for external combustion equipment, only activity data must be reported. For further details, please see Section II.F of the preamble. With regard to the use of engineering estimates for these emissions, EPA has included the option to use engineering estimates or company records, in lieu of a permanent or temporary flow meter, to quantify the field gas sent to the combustion unit.

Comment Number: EPA-HQ-OAR-2009-0923-1155-15

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

Consistent with WCI’s comments to EPA, we also support the inclusion of Contractor Emissions in the Subpart W petroleum and natural gas production definition. Contractors are responsible for

producing significant emissions that are directly associated with the oil and gas production process. We recommend those emissions be reported to the Operator and added to the total GHG emissions reported to EPA. Contractor emissions should be included in the definition for both onshore and offshore sources.

Our work with WCI has confirmed that GHG emissions from contract operations are significant because petroleum and natural gas production companies extensively outsource work to Contractors. Contract equipment and activities include significant sources of GHG emissions, including: drilling rigs, workover units, construction and maintenance equipment, logistical operations, and other specialty services.

If Contractors are not required to report emissions to the Operator, and then those emissions are not included in the facility total, the total emissions from a facility will be underestimated. Total emissions generated from all the activities required for petroleum and natural gas production should be included, whether generated by the Operator or the Contractor hired by the Operator.

We are concerned that if the Operator and Contractor separately report emissions, then separately those emissions may fall below the Reporting Threshold, when, in reality, the combined emissions should trigger mandatory reporting. We do not support a mandatory reporting system that would incentivize outsourcing to reduce Operator emissions below a Reporting Threshold.

And, as pointed out by WCI, we agree that the overall responsibility for reporting GHG emissions should rest with the Operator of the facility. Operators have the ability to include GHG emission reporting as a contract requirement. By requiring Contractors to report GHG emissions to the Operator, and then requiring the Operator to report aggregated GHG emissions to EPA, the data collection effort would be streamlined. Operators in possession of Contractor emission data will be much better equipped to select and retain Contractors that use low emission techniques or compel this standard by contract. We recommend that Subpart W include, at a minimum, the following NAIC Codes:

NAICS 213111 Drilling Oil and Gas Wells;
NAICS 213112 Support Activities for Oil and Gas Operation;
NAICS 213112 Support Activities for Oil and Gas Field Exploration;
NAICS 541360 Geophysical Surveying;
NAICS 238910 Site Preparation Contractors;
NAICS 237120 Oil and Gas Pipeline and Related Structure Construction

Response: EPA agrees with including contractor emissions in onshore production. Today's final rule makes this very clear in the emissions calculation and reporting requirements. However, for offshore production, today's final rule refers to MMS (BOEMRE) GOADS study methodologies for both Gulf of Mexico Federal waters and state and non-GOM Federal water platforms (e.g. California and Alaska). Subpart W requires the onshore production owner/operator of the wells to report all production emissions associated with petroleum and natural gas production, which includes portable as well as stationary equipment operated in conjunction with wells, including equipment that is leased, rented or contracted (e.g. drilling rigs and portable compressors). EPA

does not agree with using NAICS codes in defining facilities, and has selected the largest stationary and portable emission sources associated with wells for reporting under subpart W. The NAICS codes listed by this commenter are too broad to include emissions calculation methodologies for every conceivable source covered by these NAICS code definitions. For example, many well workover practices such as wire-line surveys, well swabbing, acid and solvent treating for accumulated scale or paraffin, would be covered by these NAICS codes but would have minor contribution to the GHG inventory to justify the cost in EPA's determination.

Comment Number: EPA-HQ-OAR-2009-0923-1201-15

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

EPA Should Include Portable Equipment Emissions and Contractor Emissions in the Final Reporting Rule Requirements.

EPA should include all portable equipment in the reporting requirements for the final rule, rather than only requiring the equipment that is stationed at a wellhead for more than thirty days to report emissions, as proposed.⁹ Portable equipment (e.g., drilling and completion equipment, and workover equipment) can generate a significant amount of emissions during periods of less than 30 days. Failure to include these emissions could result in potentially underestimating actual emissions, especially if operators stage such emissions sources for less than 30 days in order to avoid reporting requirements.

Response: In today's final rule, EPA has removed the 30-day at wellhead clause to capture emissions that may occur in less than 30 days. Please see the response to EPA-HQ-OAR-2009-0923-1298-28.

Comment Number: EPA-HQ-OAR-2009-0923-1025-1

Organization: Paiute Pipeline Company

Commenter: Jeff Maples

Comment Excerpt Text:

LNG Storage Facilities Should Be Excluded from Subpart W

Leaks, if any, are found and fixed quickly pursuant to required leak detection requirements under Title 49 Code of Federal Regulations (CFR) Part 193 and the National Fire Prevention Association (NFPA) 59A code. These facilities, as required by 49 CFR Part 193 and NFPA 59A, have fixed gas/leak detection equipment which performs continuous monitoring of field conditions. As a result of the NFPA 59A code required Site Fire Protection Evaluation, Paiute has sixty-eight fixed I/R gas detectors and seven low temperature spill detectors at its LNG

⁹ See 40 CFR 98.231(b)).

facility. These are strategically placed to monitor possible gas emissions and spills. Upon detection, these devices are required to alarm in the field and at an attended control room at 20% of the lower flammable limit of methane, or 1% methane in air. 49 CFR Part 193 also requires the LNG facility to maintain three portable gas detection devices on site for leak detection / isolation. Furthermore, these facilities are required to have trained and qualified operating personnel who monitor the installed detection systems and conduct regular facility inspections several times each day, including process post cool-down field checks to confirm that system integrity has been maintained. Due to notification by the continuous hazard detection monitoring devices to the attended control room, if leakage should occur, operating personnel are alerted immediately and the anomaly is quickly addressed. Significant fugitive emissions are therefore immediately addressed or avoided through manual intervention or activation of automated systems (Emergency Shutdown Devices).

In the preamble to this proposed rule, EPA explains that it is:

“not proposing to include reporting of fugitive emissions from natural gas pipeline segments between compressor stations, ... due to the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly”.¹⁰

EPA reasons that due to the high pressure, when there is a leak in a transmission line, the leak is more obvious because it typically causes a loud blowing jet of gas.

Liquefaction and vaporization processes at LNG peak-shaving facilities also operate at high pressure. Leaks would be similarly obvious and quickly repaired as a result. In fact, leaks in LNG facilities could be even more obvious than leaks on transmission lines because LNG facilities operate at extremely cold temperatures. Cold gas will typically create a vapor cloud or an ice formation at the leaking site which makes identification readily apparent.

EPA’s Background Technical Support Document (TSD) for this proposed rule also notes that transmission pipeline operators are required under 49 CFR §192.706 to perform leak surveys at least two to four times per calendar year, and under 49 CFR §192.711 to make permanent repairs to discovered leaks when feasible¹¹. The PHMSA has adopted regulations for LNG facilities under 49 CFR Part 193 that are at least as stringent as those for transmission lines, if not more stringent. 49 CFR Part 193 requires LNG plants to install leak and flammable gas detection systems, monitor those systems, and repair the leaking or defective component. In fact, the leak detection and repair requirements for LNG facilities are more detailed and rigorous than those for transmission lines.

As discussed above, LNG regulations are at least as stringent as transmission pipeline regulations and provide a compelling reason to exclude LNG storage facilities from GHG reporting under Subpart W. Paiute urges EPA to revise Subpart W to remove the LNG segment from the

¹⁰ Id at 18616.

¹¹ TSA at 26.

reporting rule.

Response: EPA has retained reporting requirements from LNG storage equipment since the EPA has limited data concerning GHG emissions for this sector. The Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923) discusses that emission sources in each segment of the natural gas and petroleum industry should be included in the rule if those sources contribute to 80 percent of the emissions from that segment, which are the sources included in the rule for LNG storage. EPA does not agree with the assertion that LNG facilities be treated similar to transmission pipelines. The goal of the rule is to identify and inventory emissions from multiple sectors in petroleum and natural gas systems. There is minimal existing data on the number of leaks level of emissions in LNG systems. Consequently, receiving data from LNG facilities will improve EPA's understanding of emissions for the sector. With regard to the comment that all leaks would be found under the leak detection requirements under Title 49 Code of Federal Regulations (CFR) Part 193 and the National Fire Prevention Association (NFPA) 59A code, EPA disagrees. Leak detection under subpart W, using IR leak imaging cameras or with Method 21, will identify the exact sources, whereas the NFPA 59A code requires area atmospheres to be monitored. Although the commenter has set the alarm for the area gas detection at 20 percent of the lower flammable limit, and NFPA 59A codes requires an alarm at not more than 25 percent of the lower flammable limit, it is EPA's opinion, and the experience of the leak detection surveys used to develop the leak factors in Tables W-5 and W-6 of today's final rule that these leaks did not and probably would not set off area alarms, and thereby go unnoticed. The rule defines a leak at a concentration of 10,000 ppm at the surface of the source. Considering all these factors, EPA has retained reporting of LNG emissions in today's final rule. Also, please see response to EPA-HQ-OAR-2009-0923-1299-12 for further information.

Comment Number: EPA-HQ-OAR-2009-0923-1016-37

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

LNG Storage and Import/Export Facilities Should Be Excluded from Subpart W

LNG Facilities Operate at Cryogenic Temperatures – Leaks, If Any, Are Found and Fixed Quickly pursuant to Required Leak Detection Under 49 C.F.R. Part 193

In the preamble to the 2010 Proposal, EPA explains that it is

“not proposing to include reporting of fugitive emissions from natural gas pipeline segments between compressor stations, ... due to the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly.”¹²

EPA reasons that due to the high pressure, when there is a leak in a transmission line, the leak is

¹² Id at 18616.

more obvious because it typically causes a loud blowing jet of gas.¹³

Liquefied Natural Gas (LNG) storage facilities and import terminals operate at cryogenic temperatures (< -100 degrees Fahrenheit). Leaks are obvious as a vapor cloud develops at the point of leakage as the moisture in the air condenses creating the vapor cloud.

EPA's Background Technical Support Document (TSD) for the 2010 Proposal also notes that transmission pipeline operators are required under 49 C.F.R. Part 192 Section 706 to perform leak surveys as often as two to four times per calendar year, and section 711 requires operators to make permanent repairs to discovered leaks when feasible.¹⁴ The Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) has adopted regulations for LNG facilities under 49 CFR Part 193 that are even more stringent than those for transmission lines. Part 193 requires LNG storage and import terminals to install leak and flammable gas detection systems, to monitor those systems continuously, and to repair any leaking or defective component. In fact, the leak detection and repair requirements for LNG facilities are more detailed and rigorous than those for transmission lines. Part 193 also adopts by reference the 2001 version of the ANSI consensus standard developed by the National Fire Prevention Association (NFPA), subject matter experts, government regulators, industry stakeholders, manufacturers, insurance industry representatives, fire fighters, and the public in NFPA 59-A-2001, Standard for the Production, Storage and Handling of Liquefied Natural Gas.¹⁵ The NFPA Standard is revised and updated every 3-4 years to ensure that it reflects the latest technology and practices.

Accordingly, similar to transmission pipeline segments, there are compelling reasons to exclude LNG storage facilities and import terminals from GHG reporting under Subpart W. We urge EPA to revise Subpart W to remove the LNG segment from the reporting rule.

Response: EPA does not agree with the comment and is including the LNG storage and LNG import and export equipment in today's final rule. Please see the responses to EPA-HQ-OAR-2009-0923-1025-1 and EPA-HQ-OAR-2009-0923-1299-12 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1026-7

Organization: Dominion Resources Services, Inc.

Commenter: Pamela Faggert

Comment Excerpt Text:

LNG Import, Storage and Re-gasification Facilities Should be Eliminated From Subpart W

Dominion owns and operates one of the six LNG import, storage and regasification facilities in the United States. These facilities are quite different from other segments of the natural gas

¹³ 75 Fed. Reg. at 18616

¹⁴ TSD at 26.

¹⁵ See 49 C.F.R. Part 193, section 2013. NFPA 59-A 2001 is available for purchase from www.NFPA.org.

industry. As EPA acknowledges in its preamble to the proposed Subpart W rules, there generally is little data on methane emissions from LNG operations. Further, we believe that there are certain misconceptions about methane emissions from LNG facilities, such as ours.

In fact, LNG import, storage and re-gasification terminals emit minimal methane emissions because of equipment design and operating practices. For example, these facilities all have inert gas systems (our facility at Cove Point uses nitrogen) for natural gas quality control and for use in compressor seals and packing. Except for reciprocating compressor high-pressure packing (where the packing-seal gas bleeds into the gas stream rather than to the atmosphere), we use nitrogen in equipment packing and seals. In the proposed reporting rules, EPA erroneously presumes that natural gas is always used in packing and seals (as may be the case in certain other sectors of the natural gas industry).

In addition, these facilities do not routinely vent gas from LNG storage tanks. These tanks are maintained just above atmospheric pressure. All boil-off gas is captured and either used for fuel in on-site fired heaters or compressed and sent to the gas transmission pipeline.

Piping connections associated with LNG storage tanks are typically welded rather than flanged in order to minimize leaks. Where leaks from LNG piping do occur, they are usually visible as a thin cloudy stream and as an ice formation around the leaking pipe. Such leaks are quickly identified by operating personnel, since these facilities are staffed 24 hours a day, seven days a week. Facility personnel visually inspect every area of the facility at least several times a day to ensure that equipment is operating properly and to identify leaks and other problems. Also, hundreds of gas detectors are deployed throughout each of these facilities to identify and help locate gas leaks. Leaking piping and equipment connections are typically fixed within hours or days of their discovery. Under no circumstances would a gas leak continue for a full year before repairs were made.

We strongly believe that LNG import, storage and re-gasification facilities should be eliminated from classification under Subpart W. These facilities should either be studied and subsequently regulated as a separate industry segment or not regulated for methane emissions reporting. However, we acknowledge that these facilities will continue to monitor and report subpart C combustion-related greenhouse gas emissions, if they exceed the 25,000 ton threshold.

Response: EPA agrees with this commenter that equipment that does not emit methane containing gas from vents or seals should not be reported. Today's final rule requires reporting of gas streams containing 10 percent or more of GHG (methane plus CO₂). If a compressor uses nitrogen purged seals, which do not vent 10 percent GHG containing gas, this vent stream does not need to be reported. Today's final rule also provides for flaring or recovery of methane containing vent gas to sales or fuel to reduce the reported methane emissions. Piping connectors required to be inspected do not include welded joints and connectors ½ inch diameter or smaller, so annual leak inspection surveys will be that much more efficient to the extent that the facility is largely welded joints. Regarding the ability of area safety detectors to identify the size of leaks addressed in Tables W-5 and W-6 of today's final rule, please see the responses to EPA-HQ-OAR-2009-0923-1025-1 and EPA-HQ-OAR-2009-0923-1299-12 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1168-3

Organization: Delmarva Power a PHI Company

Commenter: Wesley L. McNealy

Comment Excerpt Text:

High-pressure LNG storage facilities should be exempted from Subpart W based on the same reasons. Specifically natural gas pipeline segments between compressor stations are afforded such an exemption and leaks at LNG storage facilities are quickly detected and fixed. In fact, leaks at LNG storage facilities are easier to detect since they operate at cold temperatures meaning if a leak were to occur it would be readily identifiable due to visible pipe frosting and condensed vapor.

Response: EPA is including the LNG storage and LNG import and export equipment in today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1025-1 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1299-10

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment Excerpt Text:

As EPA acknowledges, no direct studies have been done on emissions – or the related operating activities and requirements of other federal agencies – at LNG facilities.

EPA notes that transmission pipeline segments between compressor stations are being exempted from the proposed rule, on the grounds that leaks are quickly identified and repaired following leakage surveys, which are conducted at required intervals (measured in months) in accordance with 49 C.F.R. Part 192. However, LNG facilities are subject to even more stringent requirements in 49 C.F.R. Part 193, including (i) installing, monitoring, and maintaining leak and flammable gas detection systems, designed to provide coverage for all areas of the plant as determined by a professional engineering evaluation, and required to alarm in the field and in the attended control room (and designed in some facilities to initiate emergency shutdowns, which provide automatic closure of emission release points); (ii) ensuring that maintenance scheduling on this detection equipment minimizes the amount of equipment that is out of service at one time; (iii) ensuring that when a safety device is taken out of service, the equipment it protects is also taken out of service unless it is protected by another device; (iv) field-checking equipment immediately following cooldown operations; (v) testing and inspecting safety relief valves every year, observing and documenting that they relieve as designed and that they reseal, ensuring valve closure; (vi) maintaining records of operations and maintenance for annual review by federal pipeline inspectors to show the required tests and inspections that have been performed (with steep fines for violations of the regulations); and (vii) performing field checks of all equipment on the site as determined in required facility operating procedures – at many facilities at least six times each day. It is of note that the LNG facilities are enclosed sites, staffed by maintenance and operations personnel who are trained to be aware of signs of leakage including unusual ice formations on pipes or vessels, or condensed water vapor in the vicinity of equipment, if a leak should manifest before it activates the detection equipment.

Considering all of these operational precautions, LNG facilities are at least as stringently observed and maintained as transmission pipeline segments, and should be exempted from Subpart W.

Response: EPA is including the LNG storage and LNG import and export equipment in today's final rule. Please see the responses to EPA-HQ-OAR-2009-0923-1025-1 and EPA-HQ-OAR-2009-0923-1299-12 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1009-7

Organization: Xcel Energy Inc.

Commenter: Eldon Lindt

Comment Excerpt Text:

In the Preamble of the proposed rule (pg. 18616), EPA indicates that reporting of fugitive emissions for natural gas pipeline segments between compressor stations for natural gas transmission will not be required because if fugitive emissions are found, they are quickly repaired. The proposed rule recognizes that transmission pipelines have regulatory requirements for leak surveys and repair. The proposed rule fails to recognize similar regulatory requirements for identifying and repairing of leaks on other natural gas facilities such as distribution systems, processing plants, compressor stations, and storage facilities. As an example, Xcel Energy operates a liquefied natural gas (LNG) storage facility that provides peak shaving support during high demand periods in the winter. This facility may only operate ten times during the year. Despite the infrequent operation, the facility is required by regulation to have leak detection systems that are far superior to any found on gas transmission lines. This equipment allows the operators to discover and repair leaks on the systems quickly, much like what EPA has described for transmission lines. Similarly, the use of odorant on the natural gas distribution systems allows for the quick discovery of leakage that, if not repaired quickly, may endanger life or property. Xcel Energy suggests consistent recognition of all regulatory requirements that mandate identification and repair of leaks would reduce the overall regulatory burden of the proposed regulation.

Response: EPA is including the LNG storage and LNG import and export equipment in today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1025-1 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1299-12

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment Excerpt Text:

As suggested above, LNG facility equipment, too, minimizes or eliminates emissions. Valves typically have extended bonnets and packing with high sealing qualities. As noted, safety relief valves are inspected and tested annually for lift pressure and positive reseating. Reciprocating compressors differ from those used in compressor stations, minimizing emissions from the compressor rod packing cases by using piston ring and rod packing materials of varying PTFE (Teflon) blends that are very resilient and have high sealing qualities. In the centrifugal

compressors used as liquefaction process refrigerant compressors in LNG storage facilities, the outer case seal areas and the seal oil drains are directed back to the compressor suction, so there are no gases purposely vented to the atmosphere, as the proposed rule assumes. These two types of compressors at LNG facilities further challenge the general assumptions made by the EPA regarding the impact of compressors on emissions. Finally, a majority of LNG pumps in these facilities are either submerged in the LNG tanks or fully enclosed (both pump and motor) in the pump can which contains LNG. These pump types do not require pump shaft seals and are not open to the atmosphere, so they generate no fugitive emissions. LNG pumps with external motors not enclosed within the pump can are closely monitored by facility personnel, and if leakage were to occur, the pump would be shut down and repairs to the seal performed. Due to the level of redundancy of systems and equipment, these LNG facilities are generally equipped with a number of spare pumps, allowing shutdown of any pump experiencing seal failure, while maintaining facility operations. All of this specialized equipment is very different from the valves and pumps and compressors more familiar to EPA and referenced in the quantification methods in the proposed rule. Because LNG facilities with this equipment are so effective at minimizing or eliminating emissions, they should be exempted from detecting and reporting emissions from these fugitive and vented sources.

Response: EPA’s decision to include LNG storage facilities was based on several considerations. First, please see EPA’s Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD: Background Technical Support Document (TSD) found in docket (EPA-HQ-OAR-2009-0923-0027) for EPA’s method for including LNG storage in the rule. In addition, EPA is aware of different technologies deployed by industry across several sectors to reduce emissions. If this commenter is using low emission technologies, then EPA would expect to see such emissions reflected in their submitted report. However, the use of low emission technology does not eliminate the need for LNG storage facilities to report; as such information may demonstrate differentiated emissions levels, which would inform future policy to potentially not include LNG segment of the industry. Hence reporting from LNG segment is vital to informing future policy.

Comment Number: EPA-HQ-OAR-2009-0923-1299-16

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment Excerpt Text:

The preamble to the proposed regulation, under the heading “LNG Import and Export and LNG Storage,” states, “EPA is proposing inclusion of these facilities because the National Inventory has very little data on methane emissions in these segments...”. Because the EPA has not inquired into the equipment and practices of LNG facilities before proposing the requirements for Subpart W, it has presented a plan which a cost-benefit analysis could not justify. NGA supports the withdrawal of LNG facilities from the requirements of Subpart W.

Response: EPA is including the LNG storage and LNG import and export equipment in today’s final rule. Please see the response to EPA-HQ-OAR-2009-0923-1025-1 and EPA-HQ-OAR-2009-0923-1299-12 for further details.. EPA has estimated the costs of these sectors using

similar methodology to other sectors, therefore EPA has determined the costs are not unreasonable. For further details reference the Economic Impact Analysis (EIA) in the rulemaking docket (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-3541-1

Organization: Sempra LNG

Commenter: David M. Cobb

Comment Excerpt Text:

LNG import facilities will not contribute significant levels to the overall fugitive greenhouse gas emissions in the United States and should be considered for exemption from the proposed rule . Regulations exist that require LNG import facilities to install leak and flammable gas detection systems, to monitor those systems, and to repair any leaking or defective component. Further, the significant difference in the type, style, and materials of sealing elements in equipment in LNG facilities compared to other types of natural gas facilities results in lower fugitive emissions.

Response: EPA is including the LNG storage and LNG import and export equipment in today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1025-1 and EPA-HQ-OAR-2009-0923-1299-12 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1299-13

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment Excerpt Text:

Flares are installed at some LNG facilities, serving as emergency backup equipment to receive boiloff gas in the unlikely event of a total power loss or an equipment failure that disables the boiloff compressor system. LNG facilities are typically designed and installed with multiple levels of redundancy to ensure availability, including redundant power supplies and boiloff compression units. It is assumed that these flares will be regarded by EPA as emergency equipment similar to emergency generators, and will be exempted from emission reporting.

Response: In today's final rule, flare stack emission are only reported if an emission source associated with LNG storage or LNG import and export equipment sends vented or equipment leak emissions to a flare. Otherwise, EPA does not require the reporting of flare stack emissions as a separate emission source because the EPA does not consider it significant enough to report in these segments of the petroleum and natural gas industry. As a result, reporting of emissions from emergency flaring is not required in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-3541-5

Organization: Sempra LNG

Commenter: David M. Cobb

Comment Excerpt Text:

Flares installed at LNG import facilities should be exempt from the reporting under the proposed rule as the equipment is used for emergency purposes . The flare's purpose is to serve as a safety system backup component, typically in the event of a total power loss at the facility or an equipment failure which disables the boil-off compression units.

Response: EPA does not require reporting of emergency flaring from LNG facilities in today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1299-13 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1032-2

Organization: State of New Mexico

Commenter: Jim Norton

1) Contractor emissions account for a significant fraction of emissions from the onshore oil and gas production segment.

We engaged a consultant to evaluate the contribution of contractor greenhouse gas (GHG) emissions to the total emissions from oil and gas production activities covered by the proposed Subpart W. To investigate this issue, the consultant contacted six engineering companies that conduct environmental and other engineering support activities for the EPA and the oil and gas production industry. The findings from this investigation are as follows.

Typically an oil or gas well will be owned by a series of working interest partners. They share cost burdens and profits of the well's operation. There is an operator of record, who is not necessarily the majority partner or even one of the owners, who is responsible for operating the well and complying with permits from Minerals Management Service (MMS) or the State oil and gas conservation agency.

During the well drilling and exploration phase, activities are normally contracted out by the operator of record. These contractor companies use specialty equipment to drill and complete each well. Contractor companies operate and perform service on their specialty equipment. There are a few "mega integrated" companies that do their own support activities. For example, Chesapeake owns a company that does their drilling.

Once a well reaches production phase, the day-to-day operations are routine and use of contractors becomes much less common. Operator staffs monitor well equipment and conduct routine maintenance such as well unloading. However, there are many instances where the operator uses contract pumpers for these day-to-day operations.

Periodic or non-routine workovers are almost exclusively done by contractors. Workover equipment is very specialized and can be very expensive.

Currently, the decision of whether to buy or lease compressor equipment is strictly an economic decision. Well fields that are geographically isolated generally have operator owned compressors since service calls are more costly. Where there is a significant population of wells in close proximity, compressors tend to be leased under agreements that include preventive maintenance.

Generally the trend is towards using leased compressors and potentially 50 or more percent are leased, today.

Regulatory accountability for GHG emissions may further increase the trend to increasing contracting out of these emitting activities.

The following table presents the GHG emission resulting from onshore natural gas production activities in the U.S. In the right-hand column of the table we list the estimated contribution of contractor activities to the total GHG emissions. Today, approximately 17 percent of the GHG emissions from US onshore gas production may be attributable to contractor activities. If all companies switched to leased compressors, and contracted all well maintenance and unloading activities, the contractor emissions could be 42 percent of the GHG emissions from gas production activities.

US Onshore Gas Production GHG Emissions, 2007				
Onshore Gas Production Activity (Pollutant)	National GHG Emissions		Estimate of Contractor Emissions	
	CH ₄ Bcf/year ¹	MMTCO ₂ e	%	MMTCO ₂ e
Pneumatic Devices (CH ₄)	79	31	0	0
Dehydrators and Pumps (CH ₄)	3	1	0	0
Compressor Seals and Vents (CH ₄)	12	5	50	2
Meters and Pipeline Leaks (CH ₄)	8	3	0	0
Well Venting and Flaring				
Completions (CH ₄)	29	12	100	12
Unloading (CH ₄)	57	23	0	0
Storage Tank Venting (CH ₄)	27	11	0	0
Other Methane Sources (CH ₄)	5	2	0	0
Field Gas Combustion ²				
Compressors (CO ₂) ³	NA	22	50	11
Heaters / Boilers (CO ₂) ³	NA	38	0	0
Total	220	148	-	25

1 - EPA Inventory of US, Greenhouse Gas Emissions and Sinks 1990 -2007 April, 2009. Available on the web at: epa.gov/ciimatechangeemissions/usinventoryreport.html. Updated by EPA and CCD with revised emissions estimates for glycol dehydrators, well venting, pneumatic devices, and storage tanks (EPA Presentation "Reducing Methane Emissions from Production Wells: Reduced Emission Completions", presented at EPA Gas STAR Producers Technology Transfer Workshop, Farmington, New Mexico, May 11, 2010).

2 -EPA Methane Emissions from the Natural Gas Industry, Volume 6: Vented and Combustion Source Summary (EPA-600/R-96-080f) June 1996, Updated to 2007 based on ratio of compressor activity.

3 -Product of combustion emitted as exhaust

Response: EPA has retained the requirement for reporting of contracted equipment emissions in today's final rule and clarified EPA position on this issue. Please see response to EPA-HQ-OAR-2009-0923-1170-7 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1018-46

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

In 98.233 (x), CAPP has not been able to determine why CO₂ dissolved in hydrocarbon liquids is reported as part of the oil and gas sector. As mentioned previously in 98.232(c) any CO₂ still remaining dissolved in the hydrocarbon liquid when custody is transferred to the transmission system would only be released when it is further refined. At the point of further refining the emissions associated with the liberated CO₂ would be the responsibility of the refiner. In the case of produced water, this source is typically re-injected into a designated disposal well where the CO₂ dissolved in produced water would remain dissolved and never be released to the atmosphere. Based on this information CAPP recommends the removal of these source types from the MRR and Sub-Part W.

Response: EPA has revised the rule and no longer requires the monitoring of CO₂ from produced water at onshore petroleum and natural gas production operations. Please see the response to EPA-HQ-OAR-2009-0923-1151-129 and Section II.E of the preamble to today's final rule. However EPA has clarified the rule and requires the reporting of the amount of dissolved CO₂ in hydrocarbon liquids leaving an EOR facility. This requirement is intended to complete the mass balance on EOR operations and consequently inform future policy, and EPA has decided to retain reporting requirements from EOR hydrocarbon liquids dissolved CO₂ as EPA has limited data concerning GHG emissions for this source under the US GHG Inventory. The goal of the rule is to identify and inventory emissions from multiple sources in petroleum and natural gas systems. There is minimal existing data on the level of emissions for EOR hydrocarbon liquids dissolved CO₂. Consequently, receiving data for EOR hydrocarbon liquids dissolved CO₂ will improve EPA's understanding of emissions for the sector.

Comment Number: EPA-HQ-OAR-2009-0923-1015-14

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

It seems the EPA is assuming that the entrained CO₂ will eventually be released, but it is unclear

why this assumption is being made. Further, it seems that the level of effort is not commensurate with the amount of CO₂ even the EPA expects to be emitted from this source. Also, this source is not addressed in The Climate Registry's protocol for Oil and Natural Gas GHG reporting, which is largely a more-inclusive program than EPA. If TCR did not address this as a source of emissions, it is possible that this source is not expected to be a significant emitter of GHGs.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1018-46.

Comment Number: EPA-HQ-OAR-2009-0923-1018-47

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

CAPP recommends that 98.233(y)(3) be removed from Sub-Part W since produced water is frequently injected into a disposal well where there isn't an opportunity for the entrained CO₂ to be released to the atmosphere. Asking facilities to report these quantities as if they were released is not appropriate.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1018-46.

Comment Number: EPA-HQ-OAR-2009-0923-1167-19

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

The "Produced Water Dissolved CO₂" emission source is unnecessary and should be removed from all reporting requirements.

* The amount of GHGs (i.e. CO₂) that will be vented from produced water storage tanks will be estimated from the E&P Tanks simulations required for liquid storage tanks [98.233(j)] (or by HYSIS® or an alternative process simulation software if E&P Tanks is not appropriate for water streams); thus, quarterly sampling of produced water immediately downstream of the separator per 98.233(y) is not necessary.

* As presented in sub-Comment A, the emission estimation methods for numerous emission sources are cost-prohibitive (i.e. have very high \$/tonne CO₂e) and alternative, streamlined emission estimation methods and approaches are needed. In addition, if sources identified as insignificant are retained in the MRR, alternative, simpler emission estimation methods and approaches should be applied.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1018-46.

Comment Number: EPA-HQ-OAR-2009-0923-1018-14

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Pre-amble-page 66, "The supplemental proposed rulemaking does not include emissions from tanks containing primarily water with the exception of transmission station condensate tanks where dump valve are determined to be bypassing gas. Therefore, EPA seeks comments on how to quantify emissions from tanks storing water without resulting in additional reporting burden to the facilities." ·

CAPP recommends that these sources not be included in mandatory GHG reporting, based on Canadian circumstances and a limited set of data, estimated emissions from produced water storage tanks at onshore oil and gas production facilities in Canada represent a very small fraction of total GHG emissions (i.e., <0.5% of the total).

Response: EPA did not intend for onshore production storage tanks containing produced water to report venting emissions, and today's final rule clarifies this. If additional data comes available that demonstrates that emissions from onshore production storage tanks are significant, EPA may consider adding this source at a later date.

Comment Number: EPA-HQ-OAR-2009-0923-1151-71

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

(Preamble p. 66) EPA seeks comments on how to quantify emissions from tanks storing water without resulting in additional reporting burden to the facilities.

API supports EPA's stated goal of quantifying emissions without resulting in additional reporting burden. Emissions from tanks containing primarily water (including transmission station condensate tanks) are very small (one API member determined these to contribute less than 0.2% of their GHG emissions). Therefore, API believes that EPA should not include quantification of emissions from tanks storing water in Subpart W. If EPA does choose to include this very small source, the default emission factors provided in the API Compendium for production and transmission condensate should be sufficient for providing a simple emission estimation method for this small source.

Response: EPA did not intend for onshore production storage tanks containing produced water to report venting emissions, and today's final rule clarifies this. Please see EPA-HQ-OAR-2009-0923-1018-14 for further information. However, EPA continues to require the monitoring of vented emissions from transmission storage tanks that contain water as the cause of emissions from these tanks may be a malfunctioning scrubber dump valve.

Comment Number: EPA-HQ-OAR-2009-0923-1018-42
Organization: Canadian Association of Petroleum Producers
Commenter: Rick Hyndman

Comment Excerpt Text:

CAPP recommends that in 98.233(r)(2) CBM water wells be removed and addressed in their own section as they are not components but rather production systems in their own right.

Response: EPA has removed the monitoring of emissions from CBM produced water, please see response to comment EPA-HQ-OAR-2009-0923-1151-129 and Section II.E of the preamble to today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1027-14
Organization: Offshore Operators Committee
Commenter: Allen Verret

Comment Excerpt Text:

98.236(b): Report emissions separately for standby equipment.

OOO Comment: The rule should state that section 98.236(b) does not apply to offshore platforms. The MMS GOADS process should be used to determine if emissions calculations for standby equipment need to be reported.

Response: The requirement to report emissions separately for standby equipment in Section 98.236(b) has been removed from today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1027-15
Organization: Offshore Operators Committee
Commenter: Allen Verret

Comment Excerpt Text:

98.236(c): Report activity data for each aggregated source type as follows...

OOO Comment: The rule should clearly state that section 98.236(c) does not apply to offshore platforms. The MMS GOADS process is centered around reporting activity data to MMS for emissions calculations. Additional activity data reporting would be redundant and unnecessary.

Response: It was not EPA's intention to have offshore petroleum and natural gas production facilities report reporting activity data and emissions from each aggregated source under Section 98.236(c). In today's final rule, the EPA has clarified that offshore petroleum and natural gas production facilities are not covered by the requirement set forth under Section 98.236(c). The data reporting requirements for both offshore reporters subject to GOADS and reporters in all state and non-Gulf of Mexico federal waters are set forth by BOEMRE GOADS and 30 CFR 250.302 through 304.

Comment Number: EPA-HQ-OAR-2009-0923-1027-16

Organization: Offshore Operators Committee

Commenter: Allen Verret

Comment Excerpt Text:

98.236(f): Report emissions separately for portable equipment for the following source types: drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.

- (1) Aggregate emissions by source type.
- (2) Report count of each source type.

OOO Comment: The rule should clarify that this subsection does not apply to offshore platforms. Section 98.232 lists the GHG's to report. Subsections 98.232 (b) to (i) lists them by industry segment, and only subsection (b) applies offshore. The remaining subsections, 98.232 (j) to (l), do not include portable equipment combustion emissions. Thus, for offshore sources portable equipment combustion emissions do not have to be reported. The only subsection where portable equipment arguably have to be considered for offshore platform is subsection 98.231(b) dealing with threshold calculation. However, that would result in use of Subpart C methodology to help determine Subpart W threshold applicability, then reporting those emissions separately by source types even though they do not have to be reported as a whole. It is doubtful that this was the intended result.

Response: It was not EPA's intention to have offshore petroleum and natural gas production facilities report emissions from portable equipment. In today's final rule, the EPA has clarified that offshore petroleum and natural gas production facilities the data reporting requirements for both offshore reporters subject to GOADS and reporters in all state and non-Gulf of Mexico federal waters are set forth by BOEMRE GOADS and 30 CFR 250.302 through 304.

Comment Number: EPA-HQ-OAR-2009-0923-1151-28

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Section 98.232 GHG's to report. The rule should state that any source that recovers emissions, such as by routing an off-gas stream back to the process or re-injecting it into the reservoir, is excluded from reporting. This includes equipment such as dehydrators, tanks, and acid gas units, and processes such as green completions that recover gas streams.

Response: EPA does not agree with the commenter. Recovery systems do not always function at 100 percent efficiency. Hence, EPA requires reporting of emissions from tanks and dehydrators even with any form of recovery with an adjustment to the emissions for the portion of actual recovery. As regards re-injection from AGR units, please see the response to EPA-HQ-OAR-2009-0923-0582-31.

Comment Number: EPA-HQ-OAR-2009-0923-1206-33

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Furthermore, substantial majority of low bleed devices are typically associated with a processing plant's instrumentation and are customarily driven by air (referred to as "instrumentation air") and not by natural gas. Inclusion of these devices in the GHG monitoring and reporting program deems to be unnecessary and wasteful of time that could be spent on the true significant GHG emission sources.

Response: The commenter has misinterpreted the rule, as pneumatic device venting is not required to be reported under natural gas processing facilities. In addition, low-bleed pneumatic devices are defined as control devices powered by pressurized natural gas. Therefore, reporting is not required for low-bleed devices that are driven by air in any sector.

Comment Number: EPA-HQ-OAR-2009-0923-1016-47

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

For the reasons stated in these comments, AGA urges EPA to exclude natural gas distribution facilities, underground storage facilities storing odorized natural gas, and LNG storage and import facilities. These facilities do not contribute significantly to total U.S. GHG emissions, and the burdens of reporting their emissions would far outweigh the value of the information to be collected – resulting in costs per ton that rival or exceed projected costs for a cap and trade system merely for reporting, not reducing GHG emissions. In addition, given the lack of updated emission factors and the many revisions that will be needed in Subpart W to allow our members to understand what is required and implement those requirements, to the extent EPA does not exclude such facilities from the reporting requirements under Subpart W, EPA should at least postpone the application of Subpart W to natural gas distribution, underground storage and LNG storage and import facilities until 2014 to allow time to conduct the field testing underway and develop new, more accurate emission factors. This will also allow time for EPA to propose and finalize the revisions needed to provide clear guidance to the regulated community – particularly for source categories newly added to the 2010 Proposal. We welcome the opportunity to work with the agency to improve the rule.

Response: EPA included natural gas distribution, underground storage and LNG storage and import facilities in the rule since EPA has limited data concerning GHGs emissions for these industry segments under the US GHG Inventory, and this emission data will be used to inform future policy. Regarding the inclusion of the natural gas distribution sector, please see the response to EPA-HQ-OAR-2009-0923-0955-6, and EPA-HQ-OAR-2009-0923-1009-5. Concerning the LNG sector, please see the response to EPA-HQ-OAR-2009-0923-1016-37, and for odorized gas see the response to EPA-HQ-OAR-2009-0923-0955-6. Consequently, EPA is

retaining reporting requirement for these three sectors in today's final rule. EPA does not intend to delay reporting from source categories listed by the commenter until new, more accurate emission factors become available. Please see the response to EPA-HQ-OAR-2009-0923-1299-5. Regarding the burden and value of today's final rule, please see Section III of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1059-21

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

Due to the insignificant fugitive GHG emissions and the currently inaccurate emissions estimates that come from the Subpart W Rule sources (natural gas distribution, compressors and LNG facilities), MDU recommends the EPA refrain from requiring reporting of fugitive GHG emissions from these sources.

Response: Equipment leaks in natural gas distribution and LNG facilities are a large source of emissions in this sector and are discussed in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background Technical Support Document (TSD) found in docket (EPA-HQ-OAR-2009-0923-0027), and therefore remain in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1167-45

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Noble recommends deleting the following items from the list of reported parameters for Section 98.236 or including the affected parameter(s) in the Monitoring Plan required under Section 98.3(g)(5) rather than the annual report.

- Section 98.236(c)(2) – Report emissions separately for standby equipment: Separate reporting of emissions from “standby” equipment is not practical and should not be required for onshore production because the majority of these equipment are at remote, unmanned locations; thus, the time that the large number and variety of equipment are in a “standby” mode cannot be practically determined. In addition, “standby” is not defined in the MRR and can have different meaning for different types of equipment precluding compliance certainty.

- Section 98.236(c)(4) – Acid gas removal (AGR) units: AGR operating parameters – i.e., (i) through (iii) - are required for each unit; however, AGR emission estimates are reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual units; thus, the parameter reporting requirements have limited utility, add unnecessary burden to the reporting, and should not be included in the rule.

- Section 98.236(c)(5) – Glycol dehydrators: Glycol dehydrator operating parameters – i.e., (i) (A) through (B) - are required for each unit; however, glycol dehydrator emission estimates are

reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual dehydrators. For these reasons, the parameter reporting requirements have limited utility, add unnecessary burden to the reporting considering the thousands of these emission sources, and should not be included in the rule.

- Section 98.236(c)(10) – Production liquids storage tank emissions: Production tank and associated operating parameters – i.e., (i) through (v) - are required for each unit; however, production liquids storage tank emission estimates are reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual tanks. For these reasons, the parameter reporting requirements have limited utility, add unnecessary burden to the reporting considering the tens of thousands of these emission sources, and should not be included in the rule.

- Section 98.236(c)(14) – Flare stacks: Flare stacks operating parameters – i.e., (i) through (v) - are required for each unit; however, flare stacks emission estimates are reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual flares. For these reasons, the parameter reporting requirements have limited utility, add unnecessary burden to the reporting considering the tens of thousands of these emission sources, and should not be included in the rule.

- Section 98.236(c)(17) – Centrifugal compressor wet seals: Centrifugal compressor operating parameters – i.e., (i) through (vii) - are required for each unit; however, centrifugal compressor wet seals emission estimates are reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual centrifugal compressor wet seals and degassing vents. For these reasons, the parameter reporting requirements have limited utility, add unnecessary burden to the reporting, and should not be required. Specifically, compressor throughput is not readily available and reporting this parameter would add significant burden. This data is not expected to inform policy especially given the lack of these sources within E&P

- Section 98.236(c)(18) – Reciprocating compressor rod packing: Reciprocating compressor rod packing operating parameters – i.e., (i) through (vii) - are required for each unit; however, reciprocating compressor rod packing emission estimates are reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual reciprocating compressors. For these reasons, the parameter reporting requirements have limited utility, add unnecessary burden to the reporting considering the thousands of these emission sources, and should not be required.

- Section 98.236(c)(20) – EOR injection pump blowdowns: EOR injection pump blowdowns and associated operating parameters – i.e., (i) through (iv) - are required for each pump; however, EOR injection pump blowdowns emission estimates are reported in the aggregate per Section 98.236(a) and it would not be possible to correlate the reported emissions to the reported parameters for individual pumps. The parameter reporting requirements add unnecessary burden to the reporting considering the thousands of these emission sources and should not be required. Average values for items (i), (ii), and (iv) should be documented in the Monitoring Plan required under Section 98.3(g)(5) rather than the annual report

- Section 98.236(d): The requirement for “minimum, maximum and average throughput for each operation” is not clear and no explanation for the data use is provided. This requirement should be deleted or these terms and the intended data use should be clearly defined. If this is intended to require gas, oil, and water production values for facilities (basins), then a single throughput value is determined each year; that is, minimum, maximum, and average do not apply.

- Section 98.236(f): requirement is to “Report emissions separately for portable equipment for the following source types: drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.” Most onshore production combustion equipment, such as compressors and heaters (separators), are often rotated from a site for maintenance and/or if well conditions change and more appropriately sized equipment are needed. These equipment are often leased and operated or owned by third parties further encumbering data collection. The time that individual equipment is in service at a location is not routinely tracked and whether these equipment meet the definition of a stationary source or a portable source is not well known and can not be easily determined. What is known is the time that a site has equipment installed and operating, and these are the parameters needed for estimating GHG emissions using Subpart C methodology. Separate reporting of portable and stationary equipment emissions is not practical for most production combustion equipment, and would place undo burden on the reporters, and have no impact on the total reported GHG emissions; thus, Noble recommends that this requirement be removed. Drilling rigs are the one onshore production combustion source that would be considered “portable” under most, if not all, applications and the issue of drilling rigs is addressed in Comment II.

Response: EPA disagrees with the commenter that reporting individual parameters from the sources listed in the comment and others including a) acid gas removal, b) glycol dehydrators, c) production liquids storage tanks, d) flare stacks, e) centrifugal compressors, f) reciprocating compressor rod packing, and g) EOR injection pump blowdowns have no utility. EPA deems these individual parameters as useful for informing future policy. EPA has clarified today’s final rule to specify that aggregated emissions and activity data must be reported unless otherwise noted in the reporting requirements delineated under Section 98.236(c). EPA has clarified the data reporting requirements to eliminate any parameters not otherwise used in the GHG calculation methodologies specified under Section 98.233. In situations that parameters are required and not part of the calculation methodology, EPA has deemed it necessary to inform future policy.

EPA has determined that most reporters understand the term standby with regard to compressors. Please see the response to EPA-HQ-OAR-2009-0923-1206-59. EPA is retaining reporting from standby equipment for only centrifugal and reciprocating compressors. For further information please see the response to EPA-HQ-OAR-2009-0923-1080-37.

The EPA removed the “minimum, maximum and average throughput for each operation” in today’s final rule. Please see the response to EPA-HQ-OAR-2009-0923-1024-36 for further details.

EPA disagrees with the exclusion of combustion emissions from portable equipment for onshore production from today's final rule. The emissions contribution from portable equipment is significant enough to warrant data collection. EPA has determined that owners or operators are responsible and should obtain the necessary information from the contractor. For further details, please see Section II.F of the preamble, the response to EPA-HQ-OAR-2009-0923-1024-23 and the response to EPA-HQ-OAR-2009-0923-1031-21.

Comment Number: EPA-HQ-OAR-2009-0923-1060-4

Organization: Yates Petroleum Corporation

Commenter:

Comment Excerpt Text:

The EPA has proposed aggregating sources for the purposes of determining applicability. In the Technical Support Document on page 19, the EPA states, "Reporting at the basin level will substantially increase reporting burden. However, complexity of reporting requirements will substantially be reduced if companies report at the basin level." Yates concedes that the number of reports filed is reduced as a result of basin-wide aggregation, but complexity of tracking equipment changes and emissions reporting requirements becomes extraordinarily complex to track as it is not industry practice to track equipment by basin. That information is tracked by asset line, which does not coincide with basin-wide operations.

Response: If the equipment information is tracked by asset line then they can be summed up at a basin level for EPA reporting. Furthermore, EPA has determined that operators have wellhead location (latitude and longitude) information for each wellhead that operators report to the States, which can be used to map the wellhead and associated equipment to appropriate AAPG basins. EPA cannot tailor the rule to meet every company's tracking mechanisms, basin is the least burdensome. Please see the responses to EPA-HQ-OAR-2009-0923-1305-46, EPA-HQ-OAR-2009-0923-1015-7 and EPA-HQ-OAR-2009-0923-1016-9 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-0031-1

Organization: RFS Consulting, Inc.

Commenter: Ron Sober

Comment Excerpt Text:

Do we need to have a GHG Monitoring Plan for heaters and engines under Subpart C or do we wait for promulgation of Subpart W which more clearly address oil and gas operations?

Response: The general monitoring requirements are addressed in the general provisions listed in 98.3. Subpart W requires the reporting of combustion emissions from portable and stationary equipment from onshore production, and distribution stationary combustion beginning in 2011. Data reporting requirements for subpart W combustion are outlined in Section 98.238. If your heater/engine triggers mandatory reporting requirements as outlined in The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98), then you must comply with all subpart C requirements beginning in 2010.

Comment Number: EPA-HQ-OAR-2009-0923-0133-2

Organization: Leak Surveys Inc.

Commenter: David Furry, President and Owner

Comment Excerpt Text:

Section 98.232 GHG to report, subsection (d) Onshore natural gas processing, it appears that pneumatic bleed devices (high or low bleed) or pumps are not included under the emissions to report. Since these regulators are in common usage in the natural gas processing, can EPA clarify how this equipment should be treated? Was this an oversight or is this equipment excluded from reporting when it is part of the onshore natural gas processing?

Response: There is no required reporting of pneumatic bleed device or pump venting for onshore natural gas processing based on EPA's expert judgment that most of these devices in natural gas processing are driven by air, and would not contribute to GHG emissions.

Comment Number: EPA-HQ-OAR-2009-0923-0133-3

Organization: Leak Surveys Inc.

Commenter: David Furry, President and Owner

Comment Excerpt Text:

Section 98.232 (d) (9) includes fugitives emissions from valves, connectors, open ended lines, pressure relief valves, meters, and centrifugal compressor dry seals. We are assuming that meters in this section would include the orifice meters. Orifice meters are located throughout the system from the inlet side of the gathering lines, which can be miles apart to inside the facility. We have found that leak rates on orifice meters tend to be quite low and it is not cost effective to perform camera surveys on each and everyone based on the quantity of emissions that are likely to be found. Please clarify EPA's intent for these meters. Are all orifice meters to be surveyed for leaks, or only the orifice meters within the actual processing facility boundary and then exclude the meters on the gathering lines. Are the orifice meters on the gathering lines part of the gathering line emissions.

Response: Equipment leaks from meters in onshore natural gas processing are a large source of emissions in the gas processing sector and are discussed in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027), and therefore remain in today's final rule. Meters include orifice meters. However, in today's final rule EPA has not included gathering lines and boosting stations; please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-0960-1

Organization: Contek Solutions, LLC

Commenter: Jim Johnstone

Comment Excerpt Text:

(98.233 (q)) Is the reporting of fugitive emissions required for components located in service of lines that are already captured such as flare lines, vent lines etc.

Response: The reporting of equipment leaks is required for components in vent lines and flare lines. Leak detection must be conducted at vent lines and flare lines.. EPA deems it important to gather this information to inform future policy. If leaks are present in the components of vent lines or flare lines, then these equipment leak emissions need to be quantified and reported using the appropriate methods under Section 98.233(q).

Comment Number: EPA-HQ-OAR-2009-0923-1015-10

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

Does this regulation bring all facilities reporting under Subpart C into one larger facility under Subpart W?

Response: EPA has made clarifications about the relationship between coverage of combustion under Subparts C and W. For further details, please see the response to EPA-HQ-OAR-2009-0923-1060-27.

Comment Number: EPA-HQ-OAR-2009-0923-1015-32

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille:

Comment Excerpt Text:

98.232(i)(2): Below ground meter regulators and vault fugitives. It is unclear in the supporting documentation why EPA is requiring below-ground fugitives.

Response: Customer meters are not included. Equipment leaks from natural gas distribution below ground meters are a large source of emissions in the gas distribution sector and are discussed in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027), and therefore remain in today's final rule. There is little existing data on below ground meters and regulators emissions and therefore it is important to gather data from this source in order to guide future policy.

Comment Number: EPA-HQ-OAR-2009-0923-1024-20

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

Clarification of Sources That Must Be Reported for Each Facility Type. Because EPA provides

detailed lists of equipment included in each facility type in proposed 40 C.F.R. SECTION 98.230(a), and also lists sources for which emissions must be reported for each facility type in 40 C.F.R. SECTION 98.232, there is a potential for confusion as to which sources must be monitored and reported at each type of facility. Kinder Morgan requests that EPA clarify in the text of the Mandatory Reporting Rule that each facility type is only responsible for reporting emissions from those sources listed in proposed 40 C.F.R. SECTION 98.232. It is important that this be included in the rule, rather than in the preamble or in the form of guidance, to reduce the likelihood of variable interpretations between EPA’s rule authors and EPA enforcement.

Response: EPA disagrees with this comment that the sources to be reported for each facility are confusing. The GHG to report for each listed source type are outlined in today’s final rule under Section 98.232. Section 98.230 defines the source categories covered by today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1041-1

Organization: Spectra Energy Corp

Commenter: Brianne Metzger-Doran

Comment Excerpt Text:

Sections 98.232 and 98.233 Should Be Clarified to Distinguish Between the Reporting of Emissions From Underground Storage Stations and Underground Storage Wellheads

Section 98.232(f) lists the reportable emissions sources associated with underground natural gas storage. Specifically, §98.232(f)(5) identifies fugitive emissions from “connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines” as reportable sources. When read in conjunction with §98.233, Spectra Energy’s understanding is that with respect to §98.232(f)(5) sources located at storage stations, the methodology for calculation of emissions stated in §98.233(q)(4) applies, but with respect to §98.232(f)(5) sources at storage wellheads, §98.233(r)(4) applies. Notwithstanding this reading, Spectra Energy believes that the reference to §98.232(f)(5) in both 98.233(q) and (r) could give rise to confusion. To clarify the rule, Spectra Energy recommends modifying to §98.232(f) to revise subpart (5) and add a new subpart (6) to draw a clear distinction between the calculation of fugitive emissions from underground storage stations and underground storage wellheads as follows:

(f) For underground natural gas storage, report emissions from the following sources:

...

(5) Fugitive emissions from connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines located at storage stations.

(6) Fugitive emissions from connectors, valves, pressure relief valves, and open ended lines located at storage wellheads.

Further, Spectra Energy recommends revisions to §98.233(r)(4) to clarify that this paragraph applies to underground storage wellheads by removing the reference to (f)(5) and inserting a

reference to the newly created (f)(6) as follows:

(r) Population count and emission factors. This paragraph applies to emissions sources listed in §98.232(c)(2), (c)(9), (c)(15), (c)(21), (d)(8), (e)(6), (f)(4), (f)(6), (g)(3), (h)(4), (i)(2), (i)(3), and (i)(4)...

This language, or other similar clarifying text, should be added to §§98.232 and 98.233 to eliminate any confusion about whether a component at an underground storage facility is subject to the requirements of §98.233(q) or §98.233(r).

Response: EPA agrees that it is necessary to further clarify equipment leaks in underground gas storage facilities between wellheads and storage stations. Today's final rule states the requirements to perform leak detection and apply leaker factors for components in underground storage stations under the heading of "Leak detection and leaker emission factors." Underground storage wellheads are identified under the heading of "Population count and emission factors." Table W-4 provides leaker emission factors for underground storage stations and population emission factors for underground storage wellheads.

Comment Number: EPA-HQ-OAR-2009-0923-1060-6

Organization: Yates Petroleum Corporation

Commenter:

Comment Excerpt Text:

Furthermore, the rule does not specifically imply that gathering and boosting leading to a gas plant must be under common ownership/control of the gas plant in order to be included with the gas plant's GHG emissions. Furthermore, it is not explicitly clear that the associated equipment (e.g., upstream compression and gathering) of gas processing facilities must be under common ownership and control. EPA should clarify this point.

Response: EPA has not included gathering lines as an emissions source in subpart W at this time. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1061-1

Organization: Texas Pipeline Association

Commenter: Patrick J. Nugent

Comment Excerpt Text:

TPA seeks confirmation of its understanding of the components of the facility subject to the GHG reporting requirements. As we understand the provisions of proposed Subpart W, a facility would first determine the source category applicable to its operations. It would then report GHG emissions only from the specific source types associated with that category as listed in proposed § 98.232. For example: a facility might determine that it fell into the "onshore natural gas processing" source category. Having made that threshold determination, the facility would only report emissions from the nine source types listed in § 98.232(d).

Reporting of emissions from any other source type would not be required, even if the facility had such source types on-site and even if reporting from such source types was required for facilities in other source categories. For example, if a facility in the "onshore natural gas processing" category had emissions from natural gas pneumatic low bleed device venting, such emissions would not need to be reported because pneumatic low bleed device venting is not a listed source type in § 98.232(d), even though it is a listed source type for other categories (e.g., onshore natural gas transmission compression, see § 98.232(e)(6)).

TPA seeks confirmation of its understanding of proposed rule § 98.232. At a minimum, TPA urges EPA to address this request for clarification in the preamble adopting the final rule. Entities that will be subject to the rule need to be able to clearly understand their reporting obligations. If the understanding set forth above is not correct, EPA should so state in the adoption preamble so that commenters can evaluate the impact of a different understanding of the proposed language.

Response: Today's final rule covers all of the significant sources of emissions under each category source type, taking into consideration the reporting burden, and other relevant issues. Reporters only report emissions under subpart W from sources listed in Section 98.232 "GHGs to Report" for the specific industrial category for which the reporter's facility qualifies. However, for threshold determination the reporter must combine emissions and follow the requirements of Section 98.2, for facilities that contain any source category for which calculation methods are provided. For example if the facility threshold is met, then natural gas processing must report stationary combustion emissions under subpart C.

Comment Number: EPA-HQ-OAR-2009-0923-1026-3

Organization: Dominion Resources Services, Inc.

Commenter: Pamela Faggert

Comment Excerpt Text:

Although it is not clear from the rule, it is our understanding that it is EPA's intent for each sector to report emissions for those components listed for that particular sector. This makes the definition of each sector critical to the understanding of and compliance with the rule. The definitions of the reporting sectors are, therefore, of primary importance in determining what facilities are included not only in the inventory, but also in the determination of applicability. The use of equipment listings in the definitions and a different equipment list for reporting purposes makes the rule difficult to understand. For example, the definitions of natural gas production and natural gas processing both include the component of gathering pipeline fugitives making it unclear if these emissions are to be reported for one or the other or both sectors. The rule is also unclear on how facilities that serve two functions are to be evaluated. For example, it is common for a particular facility to serve both transmission and gathering functions or for distribution companies to operate their own storage facilities. For clarification, Dominion requests that EPA to base the sector definitions on either the principle function of the facility as defined by the primary NAICS code or by the use of physical delimiters such as custody transfer points

Response: In today's final rule, EPA has not included gathering lines as an emissions source in subpart W at this time. For further information on this issue please see Section II.F.1 of the preamble. EPA has clarified facility definitions in today's final rule. For further details, please refer EPA-HQ-OAR-2009-0923-1151-20 and EPA-HQ-OAR-2009-0923-1016-28. Facilities with multiple functions are required to determine the industry segment for which a majority of emissions occur. For further information please see the response to EPA-HQ-OAR-2009-0923-1024-14. EPA will not adopt the NAICS code to identify industry segments in the petroleum and natural gas systems for several reasons. For further information, please see the response to EPA-HQ-OAR-2009-0923-1024-14.

Comment Number: EPA-HQ-OAR-2009-0923-1151-21

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Section 98.230(a)(5) Underground natural gas storage. Section 98.230(a)(5) states underground natural gas storage facility includes "natural gas underground storage processes and operations (including, but not limited to, compression, dehydration and flow measurement)..." Section 98.232(f) provides the underground natural gas storage facility sources from which emissions are to be reported and lists: reciprocating compressor rod packing venting; centrifugal compressor wet seal degassing vent; natural gas pneumatic high bleed device venting; natural gas pneumatic low bleed device venting; and fugitive emissions. Section 98.232(f) does not indicate that emissions from dehydrator vent stacks need to be reported for underground natural gas storage facilities. Section 98.230(a)(5) and Section 98.232(f) appears inconsistent in the handling of underground natural gas storage dehydrator vents. It is not clear whether emissions from dehydrator vents at underground natural gas storage facilities should be reported.

Response: Dehydrator vent are not listed as a specific source in Section 98.232(f), and therefore, EPA does not require emissions to be reported for dehydrator vent for underground natural gas storage.

Comment Number: EPA-HQ-OAR-2009-0923-1151-25

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Section 98.232 GHG's to report. API's interpretation of the sources identified for the source categories in Section 98.232 is that a subject facility would only have to report emissions from the sources identified for that source category. API would like clarification of this interpretation as the definitions of the source categories in Section 98.230 describe sources that may not be specified in Section 98.232. API understands EPA intends to have source categories report the largest sources of emissions so that if the source is not listed for the source category you do not have to report emissions for that source. API suggests that EPA define the source category but also include primary North American Industrial Classification System (NAICS) code as the

determining factor.

Section 98.232 GHG's to report. Dehydration units appear to be part of the underground natural gas storage facility since Section 98.230(a)(5) states underground natural gas storage facility includes "natural gas underground storage processes and operations (including, but not limited to, compression, dehydration and flow measurement)..." Section 98.232(f) provides the underground natural gas storage facility sources from which emissions are to be reported and lists: reciprocating compressor rod packing venting; centrifugal compressor wet seal degassing vent; natural gas pneumatic high bleed device venting; natural gas pneumatic low bleed device venting; and fugitive emissions. Section 98.232(f) does not indicate that emissions from dehydrator vent stacks need to be reported for underground natural gas storage facilities. Section 98.230(a)(5) and Section 98.232(f) appear inconsistent in the handling of underground natural gas storage dehydrator vents. Are emissions from dehydrator vents at underground natural gas storage facilities to be reported?

Response: EPA will not adopt the NAICS code to identify industry segments in the petroleum and natural gas systems. For further information please see the response to EPA-HQ-OAR-2009-0923-1024-14. EPA does not require emission to be reported for dehydrator vent at underground natural gas storage facilities. Please see the response to EPA-HQ-OAR-2009-0923-1151-21. Regarding GHG to report, please see response to comment EPA-HQ-OAR-2009-0923-1061-1.

Comment Number: EPA-HQ-OAR-2009-0923-1151-27

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Section 98.232 GHG's to report. Paragraph (k) requires reporters to report under subpart C the emissions of CO₂, CH₄, and N₂O from each stationary fuel combustion units by following the requirements of subpart C. Subpart C Section 98.30(b)(1) says the source category subject to Subpart C excludes portable equipment. Section 98.230(a)(2) says the onshore petroleum and natural gas production source category includes "...portable non-self-propelled equipment (including but not limited to well drilling and completion equipment, workover, equipment, gravity separation equipment, auxiliary non-transportation-related equipment, and leased, rented or contracted equipment..." API requests EPA clarify if the source category definitions in Section 98.230 and in particular Section 98.230(a)(2) only apply to vented, fugitive and flare emissions reported under Subpart W or if the source category definitions in Section 98.230 also apply to combustion sources located at the petroleum and natural gas source category facilities. In other words, for onshore petroleum and natural gas facilities which of the following 2 scenarios is the correct interpretation: (1) are stationary, portable, rented, contracted and leased vented and fugitive emissions reported under Subpart W and stationary, portable, rented, contracted and leased combustion source emissions reported under Subpart C because Section 98.230(a)(2) says portable, rented, contracted and leased equipment is part of the onshore production facility; OR (2) are stationary, portable, rented, contracted and leased vented and fugitive emissions reported under Subpart W because Section 98.230(a)(2) says portable, rented, contracted and leased equipment is part of the onshore production facility and only stationary

combustion source emissions (not portable, rented, contracted and leased combustion source emissions) are reported under Subpart C because Section 98.232(k) says to report combustion emissions following the requirements of Subpart C which includes an exclusion for portable combustion emissions?

Response: The source category definition for onshore production in Section 98.230(a)(2) applies to vented, equipment leaks, flare, and portable (leased, rented or contracted) and stationary combustion emissions. Onshore petroleum and natural gas production must report under subpart W all stationary and portable combustion emissions as specified in Section 98.232(c). The source category definition for onshore petroleum and natural gas production in Section 98.230(a)(2) apply to both combustion emissions, equipment leaks, vented, and flare emissions.

Comment Number: EPA-HQ-OAR-2009-0923-1167-15

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Data quality objectives should be defined to provide guidance on emission source inclusion and emission estimation method selection. * Percent of total sector emissions to be included in the inventory. For example, the proposed rule preamble and other supporting documentation have discussed including the largest emission sources that contribute to approximately 80 percent of the industry segment GHG emissions.

Response: It is not clear what the commenter’s intention was in regard to “data quality objectives”, however, EPA evaluated options for obtaining emissions data in a way that maximizes information on activity and emissions quality while maintaining reasonable burden.

Comment Number: EPA-HQ-OAR-2009-0923-1202-4

Organization: Enterprise Products

Commenter: Rodney Sartor

Comment Excerpt Text:

There are additional operational ambiguities associated with gas compression facilities that may lead into multiple gas processing facilities not addressed in the rule. It is unclear how a facility would be treated in such a context.

Response: EPA interprets this comment as addressing the inclusion of gathering and boosting stations in the gas processing sector in the April 2010 proposed rule, found in (EPA-HQ-OAR-2009-0923-0002), and possible confusion over how these facilities should be treated. EPA has not included gathering lines as an emissions source in subpart W at this time. For further information on this issue please see Section II.F of the preamble for a response to this comment.

Comment Number: EPA-HQ-OAR-2009-0923-1011-28

Organization: El Paso Corporation

Commenter: Fiji George

Comment Excerpt Text:

Preamble Section II.(C.) on Page 18613, Definition of the Source Category for Onshore Petroleum and Natural Gas Production

Under a number of provisions of the Clean Air Act, the term “facility” has a specific meaning as a “group of emissions all located in a contiguous area and under the control of the same person (or persons under common control).” As EPA notes in the TSD, this definition can be easily applied to onshore natural gas processing and petroleum refining facilities, which are located in a clearly defined boundary. EPA also notes that this definition does not directly lend itself to onshore petroleum and natural gas production, onshore natural gas transmission pipelines and natural gas distribution sectors. Therefore, to avoid confusion, the EPA should utilize the term “reporting area” rather than “facility” in referring to the geographical area used to assess emission thresholds for onshore oil and gas production.

Response: EPA disagrees, please see response to comments EPA-HQ-OAR-2009-0923-1044-1 and EPA-HQ-OAR-2009-0923-1174-5.

Comment Number: EPA-HQ-OAR-2009-0923-1024-42

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

SECTION 98.230 Definition of the source category.

(a) This source category consists of the following:

(1) Offshore petroleum and natural gas production. Offshore petroleum and natural gas production is any platform structure, affixed temporarily or permanently to offshore submerged lands, that houses equipment to extract hydrocarbons from the ocean or lake floor and that transfers such hydrocarbons to storage, transport vessels, or onshore. In addition, offshore production includes secondary platform structures and storage tanks associated with the platform structure.

(2) Onshore petroleum and natural gas production. Onshore petroleum and natural gas production equipment means all structures associated with wells (including but not limited to compressors, generators, or storage facilities), piping (including ~~but not limited to~~ flowlines or ~~intra-facility gathering lines~~), and portable non-self-propelled equipment (including but not limited to well drilling and completion equipment, workover equipment, gravity separation equipment, auxiliary non-transportation-related equipment, and leased, rented or contracted equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of petroleum and/or natural gas (including condensate). This also includes associated

storage or measurement and all systems engaged in gathering produced gas from multiple wells, all EOR operations using CO₂, *except CO₂ transmission pipelines*, and all petroleum and natural gas production located on islands, artificial islands or structures connected by a causeway to land, an island, or artificial island. *Onshore petroleum and natural gas production equipment does not include gathering pipelines or associated booster and compressor stations.*

(3) *Field gathering and/or boosting stations. Field gathering and/or boosting stations means any fixed combinations of compressors and/or processing equipment that gather natural gas from multiple wellheads, and compress and transport natural gas as feed to natural gas processing plants or that send the natural gas to an onshore natural gas transmission compression facility, or natural gas distribution facility, or to an end user.*

(3) Onshore natural gas processing plants. Natural gas processing plants are designed to separate and recover natural gas liquids (NGLs) or other non-methane gases and liquids from a stream of produced natural gas to meet onshore natural gas transmission pipeline quality specifications through equipment performing one or more of the following processes: oil and condensate removal, water removal, separation of natural gas liquids, sulfur and carbon dioxide removal, fractionation of NGLs, or other processes, and also the capture of CO₂ separated from natural gas streams for delivery outside the facility. ~~In addition, field gathering and/or boosting stations that gather and process natural gas from multiple wellheads, and compress and transport natural gas (including but not limited to flowlines or intra-facility gathering lines or compressors) as feed to the natural gas processing plants are considered a part of the processing plant. Gathering and boosting stations that send the natural gas to an onshore natural gas transmission compression facility, or natural gas distribution facility, or to an end user are considered stand alone natural gas processing facilities.~~ All residue gas compression equipment operated by a processing plant, whether inside or outside the processing plant fence, are considered part of natural gas processing plant. *Onshore natural gas processing plants do not include gathering pipelines or field gathering and/or boosting stations.*

(4) Onshore natural gas transmission compression. Onshore natural gas transmission compression means any fixed combination of compressors that move natural gas at elevated pressure from production fields or natural gas processing facilities, in transmission pipelines, to natural gas distribution pipelines, or into storage. In addition, transmission compressor station includes equipment for liquids separation, natural gas dehydration, and tanks for the storage of water and hydrocarbon liquids.

(5) Underground natural gas storage. Underground natural gas storage means subsurface storage, including but not limited to, depleted gas or oil reservoirs and salt dome caverns utilized for storing natural gas that has been transferred from its original location for the primary purpose of load balancing (the process of equalizing the receipt and delivery of natural gas); natural gas underground storage processes and operations (including, but not limited to, compression, dehydration and flow measurement); and all the wellheads connected to the compression units located at the facility.

(b) ~~[Reserved]~~ *A facility shall be classified as pertaining to one of the segments above according to its primary NAICS code. Where a facility's primary NAICS code alone does not definitively*

establish its classification, additional information may be provided as appropriate to justify the classification of the facility.

Response: EPA has not included gathering lines or gathering and boosting stations as an emissions source in subpart W at this time. For further information on this issue please see Section II.F of the preamble for a response to this comment.

EPA will not adopt the NAICS code to identify industry segments in the petroleum and natural gas systems for several reasons. For further information please see the response to EPA-HQ-OAR-2009-0923-1024-14. EPA has not included CO₂ transmission pipelines as it is not a large emissions source in this source category. Please see the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1074-10

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment: WBIH recommends the addition of the word "storage" whenever "condensate tanks" is referenced.

There should be consistency across petroleum and natural gas system industry segments when referring to "condensate storage tanks."

Response: EPA disagrees with the comment that condensate storage tanks need further definition. For onshore production, atmospheric pressure, fixed roof storage tanks that receive hydrocarbon produced liquids are covered by today's final rule. For transmission compressor stations, any storage tank receiving condensate, either water or hydrocarbon, from compressor scrubbers is also covered by today's final rule for identifying and quantifying scrubber dump valve through leakage, not for determining flash gas losses from hydrocarbon or water condensate collected in those tanks. Today's final rule has clarified this for transmission storage tanks in Section 98.233(k).

Comment Number: EPA-HQ-OAR-2009-0923-1074-23

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment on 98.230: Definition of source category.

Revise the title of the section to read: "Definition of segment category."

Response: EPA disagrees with the comment and will retain existing terminology as it is consistent with the overall Mandatory Reporting Rule.

Comment Number: EPA-HQ-OAR-2009-0923-1074-24

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment on 98.230(a):

Revise the sentence to read: "This segment category consists of the following:"

Response: EPA disagrees with the comment. Please the response to EPA-HQ-OAR-2009-0923-1074-23.

Comment Number: EPA-HQ-OAR-2009-0923-1074-28

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment on 98.232(e)(3):

Revise to read: "Transmission condensate storage tanks."

Response: EPA disagrees with the comment. Please see the definition of storage tank in The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98); Section 98.6.

Comment Number: EPA-HQ-OAR-2009-0923-1074-29

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment on 98.232(j):

Revised for clarification.

Revise to read: "You must report the CO₂, CH₄, and N₂O emissions from each flare as required in paragraph (b) through (i) of this section."

Response: EPA has clarified the rule text under Section 98.232(j) to indicate that only applicable segments should report CO₂, CH₄, and N₂O emissions.

Comment Number: EPA-HQ-OAR-2009-0923-1074-9

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment: WBIH recommends a wording change with regard to the reference, "condensate tank vents in transmission can be a significant source of emissions from malfunctioning compressor scrubber dump valves and ..." to "malfunctioning compressor scrubber dump valves can be a significant source of emissions as gas will bypass via the open dump valve and through the condensate storage tank."

The clarification as to the "significant source of emissions" is required since emissions from condensate storage tanks are considered insignificant.

Response: EPA disagrees with the comment, as the sentence to which the commenter is referring is in the April 2010 proposed rule's preamble and appropriately describes emissions from transmission storage tanks..

Comment Number: EPA-HQ-OAR-2009-0923-1080-1

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

The proposed rule is inconsistent and unclear regarding which compressors are covered. The preamble speaks only to "large" compressors but no where do we see defined what a large compressor is. (See Table W-4.) In contrast, the proposed rule text would encompass all reciprocating compressors, regardless of size.

Response: In today's final rule, the language "'large' compressors" has been removed. Please see the response to EPA-HQ-OAR-2009-0923-1019-2.

Comment Number: EPA-HQ-OAR-2009-0923-1080-33

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

If EPA determines that GHG emissions from gathering lines must be reported, we recommend that a definition for gathering lines should be included in the rule. Such a definition should specify that gathering lines: (1) are located upstream of natural gas processing plants; (2) carry produced gas; (3) do not include piping within gas plants, compression facilities, and treatment facilities; and (4) do not include transmission lines, even if located upstream of a gas plant.

Response: EPA has not included gathering lines as an emissions source in subpart W at this time. For further information on this issue please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1151-7

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Definition of Source Categories

Section 98.230(a)(2) and (3) Definition of the source categories for Onshore Petroleum and Natural Gas Production and Onshore Natural Gas Processing Plants

As proposed, the definitions under Section 98.203(a)(2) and (3) lack a clearly defined boundary between the two segments. While EPA asserts that the facility definition "...can easily be applied to onshore natural gas processing...since the operations are all located in a clearly defined boundary" (Technical Support Document p.17), this is not the case in Subpart W, where EPA has expanded the definition of the natural gas processing plant to encompass additional assets and created an indistinct boundary as a result. The lack of clarity poses several problems.

First, there is significant overlap between the two definitions in both the physical description and process descriptions. From the physical description standpoint, both definitions include gathering and boosting systems and sites which gather gas from multiple wells. By EPA's own acknowledgement, for gathering pipelines, "it is difficult to assign this portion of onshore production to one particular segment. One option is to require gathering pipelines to be reported as an emissions source. The other option is to have a separate segment assigned to gathering pipelines." From the process description standpoint, the definitions overlap in the areas of phase separation (into hydrocarbon liquids, gas, and water), dehydration of natural gas, stabilization of hydrocarbon liquids, and removal of NGL, if pentane, separated as a component of condensate, is considered an NGL. A clear distinction between the production segment and processing segment must be made to avoid determinations that individual well sites are processing facilities and to avoid double counting sources under both production and processing.

Second, structurally, the somewhat simplistic linear construct of the two definitions does not fit the complexity of the actual industry ownership and operating structure, and may not be implement able as written. It appears that EPA is assuming gathering lines are dedicated to a specific gas processing plant. Operator ship/Ownership and routing of gathering and collection systems between the wells and processing plants is much more complex. Handling of at least three different patterns of operator ship/ownership must be considered and described with variations on each definition. These three patterns are:

1. One company operates/owns the wells, collection system, and gas processing facility.
2. One company operates/owns the wells and a second company operates/owns both the collection systems and processing facilities.
3. One company operates the wells, a second company (or perhaps multiple companies) operates the collection systems, and a third company operates the gas processing facilities.

This is further complicated by the fact that many collection systems, in any of the three patterns, are interconnected or "looped" to enable balancing of production against available collection,

compression and processing capacity. On any given day a well or collection system booster station may be routed directly to processing facility A, be routed directly to processing facility B, or be shuttled to another collection system (or multiple) for routing to either processing facility A or B or an entirely different processing facility. In each of these scenarios, the operatorship of the collection systems and processing facilities can be different as described above. Also, in many instances, certain equipment located on individual well sites (dehydrators are common) are owned/operated by the collection system operator - which may or may not be the owner/operator of the processing facility that ultimately receives the gas. As individual gathering/collection system booster stations are routed to different processing facilities their status can change from inclusion with the receiving processing facility, inclusion with the wells which they serve, or to stand-alone facilities (or perhaps not covered due to the stand-alone definition being keyed to routing directly to a transmission line). This can occur on a day to day basis and make it very difficult to determine how a particular facility should be handled on a particular day.

API believes that EPA could best address the issues described above by modifying the two existing definitions and including a third definition for “Onshore Natural Gas Gathering and Collection Systems”, which segments this portion of the Petroleum and Natural Gas Sector category into three segments rather than two. The reporting of gathering pipelines as a separate segment is supported by EPA’s Technical Support Document (“TSD”), which states that “Unlike other segments of the petroleum and natural gas industry, gathering systems may be owned by producers, processing plants, transmission companies, local distribution companies, or independent gathering companies. Therefore, it is difficult to assign this portion of onshore production to one particular segment. One option is to require gathering pipelines to be reported as an emissions source. The other option is to have a separate segment assigned to gathering pipelines.” (TSD p.18). In the TSD Appendix, EPA’s own recommendation is that gathering pipelines be reported at the company level, separate from the natural gas processing plants and gathering compressor stations. Specifically, “If GHG emissions from the natural gas gathering pipeline segment were included, it could be most straightforward to have emissions reported at the pipeline company level as this is consistent with the PHMSA reporting.” (TSD p.108). API’s suggested revisions to clarify the segments follow (our proposed language changes/additions are shown in green). API also provides an insert to Section 98.232 for the proposed new segment.

Section 98.230(a) (2) Onshore petroleum and natural gas production. Onshore petroleum and natural gas production equipment means all structures *and equipment* associated with wells ~~and generally located on or near the well(s) being serviced~~ (including but not limited to compressors, generators, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), and portable non-self-propelled equipment (~~including but not limited to drilling rigs and rental compression well drilling and completion equipment, workover equipment, gravity separation equipment, auxiliary non-transportation related equipment, and leased, rented or contracted equipment~~) used in the production, extraction, recovery, lifting, stabilization, separation, *compression, pumping*, or treating of petroleum and/or natural gas (including condensate). This also includes associated storage or measurement and all systems engaged in gathering, *separating, treating, compressing, or stabilizing* produced gas [*IN GREEN: and hydrocarbon liquids* from multiple wells *which is not included in the onshore natural gas gathering and collection systems or natural gas processing plants*, all EOR operations using CO₂, and all petroleum and natural gas production located on islands, artificial islands or

structures connected by a causeway to land, an island, or artificial island *which are owned/operated by the owner/operator of the well (s).*

NEW Section 98.230 (3)(a) (??) Onshore natural gas gathering and collection systems: Onshore natural gas gathering and collection systems along with their field gathering and/or boosting stations are intended to gather and process natural gas from multiple wellsites or other gathering/collection systems, and compress and transport natural gas (including but not limited to flowlines or intra-facility gathering lines or compressors) as feed to the natural gas processing plants or directly to a natural gas transmission or distribution facility. Onshore natural gas gathering and collection systems may include equipment and processes for phase separation, condensate and water removal, dehydration, stabilization or treating of petroleum and/or natural gas, compression, storage, and metering. However, the main purpose of an onshore natural gas gathering and collection system is the gathering and transport of gas prior to processing or transmission. Onshore natural gas gathering and collection systems do not include residue gas compression down-stream of a processing facility which is included with the processing facility. Onshore natural gas gathering compression means any fixed combination of compressors that move natural gas from production fields or other compression facilities into natural gas processing facilities, other gathering compression facilities, transmission pipelines, storage facilities, or other end users. In addition, natural gas gathering compressor facilities may include equipment for liquids separation, natural gas dehydration, and tanks for the storage of water and hydrocarbon liquids.

Section 98.230 (4) (a) (3) Onshore natural gas processing plants. Natural gas processing plants are designed to separate and recover natural gas liquids (NGLs) or other non-methane gases and liquids from a stream of produced natural gas to meet onshore natural gas transmission pipeline quality specifications through equipment performing one or more of the following processes: oil and condensate removal, water removal, separation of natural gas liquids, sulfur and carbon dioxide removal, fractionation of NGLs, or other processes, and also the capture of CO₂ separated from natural gas streams for delivery outside the facility. ~~In addition, field gathering and/or boosting stations that gather and process natural gas from multiple wellheads, and compress and transport natural gas (including but not limited to flowlines or intra-facility gathering lines or compressors) as feed to the natural gas processing plants are considered a part of the processing plant. Gathering and boosting stations that send the natural gas to an onshore natural gas transmission compression facility, or natural gas distribution facility, or to an end user are considered stand alone natural gas processing facilities.~~ All residue gas compression equipment *owned/operated by a processing plant and located in close proximity to the processing plant*, whether inside or outside the processing plant fence, are considered part of natural gas processing plant.

NEW Section 98.232 (??) For Onshore natural gas gathering and collection systems, report emissions from the following source types:

- (1) Reciprocating compressor rod packing venting.*
- (2) Storage tanks.*
- (3) Blowdown vent stacks.*
- (4) Dehydrator vent stacks.*

(5) *Gathering pipeline fugitives.*

(6) *Fugitive emissions from: valves, connectors, open ended lines, pressure relief valves, and meters.*

Section 98.230(a)(4) Onshore Natural Gas Transmission Compression

In addition, it is not clear where onshore natural gas transmission compression begins. API recommends consistency with the definition in Subpart HHH of the NESHAP regulations.

Response: Today's final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1202-6

Organization: Enterprise Products

Commenter: Rodney Sartor

Comment Excerpt Text:

For Enterprise, the proposed aggregation of facilities will result in an almost ten fold increase in reporting requirements for facilities, when compared with those reporting under Subpart C

Each gas processing and gathering compression facility should be considered as a discrete operation, consistent with Subpart C requirements and other existing air regulations such as the CAA.

Response: Today's final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1206-58

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

As discussed in the comment provided for the onshore natural gas processing plants source category in Section 98.230(a)(3), an onshore natural gas production facility may contain some of the processes that are currently defined as part of an onshore natural gas processing plant (e.g., the removal of water, condensate, and/or oil). Due to this confusion in the definitions of "production" and "processing," many production facilities could fall into both categories. This will result in different operators defining their operations inconsistently, and will most likely result in facility emissions being double counted in both source categories. We request that the source categories and definitions for "onshore natural gas production facility" and "onshore natural gas processing plant" clearly define the difference between the operations to extirpate overlap between the two.

Response: Today's final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble. Furthermore, EPA has clarified the boundaries of onshore production and natural gas processing. Please see the response to comment EPA-HQ-OAR-2009-0923-1305-6.

Comment Number: EPA-HQ-OAR-2009-0923-1298-26

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

The Onshore natural gas processing plants source category also states:

In addition, field gathering and/or boosting stations that gather and process natural gas from multiple wellheads, and compress and transport natural gas (including but not limited to flowlines or intra-facility gathering lines or compressors) as feed to the natural gas processing plants are considered a part of the processing plant....All residue gas compression equipment operated by a processing plant, whether inside or outside the processing plant fence, are considered part of natural gas processing plant.

These statements result in aggregating the emissions from multiple surface facilities. For the reasons discussed in the comment provided for the definition of Onshore petroleum and natural gas production facility in Section 98.238, IPAMS does not agree with introducing source aggregation into this program. IPAMS requests that EPA remove these statements from this source category and that EPA clearly define "natural gas processing plant" as a single facility as EPA defined that term in 40 CFR 52.21(b)(6).

Response: Today's does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble. Please see Topic 2: Aggregation of Gathering and Boosting Systems with Processing Facilities" in Volume 9 of the response to comments to today's final rule (EPA-HQ-OAR-2009-0923) and the response to EPA-HQ-OAR-2009-0923-1044-1. However residue gas compression owned or operated by a natural gas processing facility whether inside or outside the processing facility fence are included in natural gas processing.

Comment Number: EPA-HQ-OAR-2009-0923-1040-1

Organization: American Exploration & Production Council

Commenter: V. Bruce Thompson

Comment Excerpt Text:

As described more fully below, we have two overarching concerns with the proposal. First, the proposal would require E&P operations to be aggregated in a manner that is inconsistent with current Clean Air Act ("CAA") regulations and incompatible with actual ownership and control of the affected operations, To solve these problems, we recommend that "roll up" reporting

should be required for stationary sources (as currently defined under the CAA) that are located in specified reporting areas.

Second, the proposal would impose detailed emissions estimating and measurement requirements that will be far more costly than EPA predicts and would produce information that is no more useful to the Agency than information that could be gathered in significantly less prescriptive and costly ways. It is important to emphasize that the information submitted under Subpart W is to assist the Agency in understanding the nature of GHG emissions from this sector and to provide information that might be useful in the development of subsequent policies and regulations. As such, the information must be reliable and of good quality, but does not need to be comparable to what might be needed to demonstrate compliance with an actual standard or to prove the validity of an offset or allowance that might be used in a credit-based trading program. The proposed Subpart W requirements for the upstream sector are far more burdensome and costly than needed to develop the GHG emissions data that EPA currently needs

Response: EPA disagrees with the comment regarding aggregation. Please see response to comments EPA-HQ-OAR-2009-0923-1005-2, EPA-HQ-OAR-2009-0923-1044-1 and EPA-HQ-OAR-2009-0923-1174-5

With regard to underestimation of costs, EPA disagrees with the assessment. Please see EPA's response to EPA-HQ-OAR-2009-0923-1151-107 for further details regarding EPA's cost estimate. EPA agrees with the comment that the rule should specify that the primary benefit of mandatory reporting of petroleum and natural gas systems GHG emissions to government will be realized in developing future policy considerations, and today's final rule makes this statement. However, EPA disagrees that subpart W requirements for the upstream sector are far more burdensome and costly than needed. EPA has selected a reporting threshold that maximizes the rule coverage with 85 percent of U.S. GHG emissions while keeping reporting burden to a minimum. For further details, please refer to the response to EPA-HQ-OAR-2009-0923-1015-1 as well as Section III.B.2 of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1080-16

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

The proposal would impose detailed emissions estimating and measurement requirements that will be far more costly than EPA predicts and would produce information that is no more useful to the Agency than information that could be gathered in significantly less prescriptive and costly ways. In the preamble to the rule, EPA states that use of direct measurement of emissions will be required for only the most significant emissions sources, which are: compressors, the primary methane emissions source and acid gas removal vents, the major source of carbon dioxide. Therefore, these two types of equipment should be the only processing equipment evaluated for GHG emissions under this regulation. EPA further states that all other listed equipment are "potential sources", yet these sources must be counted and measured in order to determine what their minor contributions of GHG emissions might be. This not a cost effective data collection

system. There is no “bang for the buck” when considering resource expenditures versus the significance of data collected.

Response: EPA disagrees with the commenter that the agency’s cost estimates are grossly underestimated. EPA has determined that the commenter’s different assumptions and misinterpretations of the proposed rule account for many of the discrepancies between the estimates. For further details, please refer to the responses to comments EPA-HQ-OAR-2009-0923-1015-1 and EPA-HQ-OAR-2009-0923-1151-107, as well as Section III.B.2 of the preamble.

With regard to the use of direct measurement of emissions, in order to reduce the reporting burden, EPA is proposing different monitoring methods for different emissions sources, requiring direct measurement only for selected sources, including gas well venting during completions or workovers from hydraulic fracturing, transmission storage tanks, and compressor venting. See Section II.D in the preamble for a concise summary of source specific monitoring methods and emissions quantification.

EPA disagrees that only compressors and acid gas removal vents should be included in the rule for natural gas processing. EPA identified sources for the rule based on their relative size of emissions within a specific sector of the oil and gas industry. Please see the Technical Support Document EPA-HQ-OAR-2009-0923. Finally, with regard to minor emissions sources, EPA has determined the selected threshold maximizes the rule coverage with 85 percent of U.S. GHG emissions while keeping reporting burden to a minimum, and disagrees that there is no “bang for the buck.” Please see EPA’s response to EPA-HQ-OAR-2009-0923-1015-107 for further details regarding EPA’s cost estimate.

Comment Number: EPA-HQ-OAR-2009-0923-1061-2

Organization: Texas Pipeline Association

Commenter: Patrick J. Nugent

Comment Excerpt Text:

In light of the importance of the source category determinations, TPA urges EPA to use SIC I NAICS codes instead of the current imprecise source category descriptions. As outlined above, the crucial question in terms of applicability and reporting requirements under proposed Subpart W is which of the eight source categories a given facility is covered by. This is because the specific source type reporting requirements vary from one source category to another. See § 98.232. Given the importance of the threshold source category determination, the rule should define each of the eight source categories with as much clarity and precision as possible. We believe that the better approach would be to tie the source category definition to SIC / NAICS codes. There would be one source category / code per facility, and the source category / code that applied to a facility would be that which best reflected the facility's primary function. Such a coding system would be familiar to industry and to regulators, and the use of such codes would provide precision and specificity by eliminating the guesswork that would be caused by use of definitions, as currently proposed, that may create uncertainty in the regulated community as to which source category a given facility is covered by

Response: EPA considered and decided to not adopt the NAICS codes to identify industry segments in the petroleum and natural gas. Please see EPA’s response to EPA-HQ-OAR-2009-0923-1024-14 for more information on this comment.

In today’s final rule, EPA provided clear definitions of source categories that must report. The selection of source categories is outlined in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027).

Comment Number: EPA-HQ-OAR-2009-0923-1167-48

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Noble recommends revisions to Section 98.232(a) to indicate the following (recommended added text is bold):

“(a) You must report CO₂ and CH₄ emissions from each industry segment specified in paragraph (b) through (i) of this section and only those sources specified for the industry segment shall be reported for an applicable facility under this subpart.”

(i) The industry segment specified in paragraph (b) through (i) shall be based on the primary NAICS code reported under Section 98.3(c)(10)(i).

(ii) When the NAICS code includes multiple industry segments from paragraph (b) through (i) of this section, the industry segment shall be based on the activity that provides the primary source of revenue for a particular facility, which shall be reported along with the primary NAICS code in the annual report.”

Noble recommends that the primary North American Industry Classification System (NAICS) code reported for a facility serve as the basis to identify the applicable industry segment and Section 98.232 subsection. The language above, or similar text, should be added to section Section 98.232 to clarify the source segment for a particular facility. On April 12, 2010, EPA proposed amendments to Subpart A of the Mandatory Reporting Rule at 75 FR 18455 – 18468. The proposed amendments include the requirement for reporters to provide, “...their primary and all other applicable North American Industry Classification System (NAICS) code(s)”. [75 FR 18455] If the Subpart A amendments are not finalized for reference in the Final Rule, the language provided in (a)(i) above could be revised to delete reference to Subpart A, but still provide similar criteria.

Response: EPA considered and decided to not adopt the NAICS codes to identify industry segments in the petroleum and natural gas. Please see EPA’s response to EPA-HQ-OAR-2009-0923-1024-14 for more information on this comment.

Comment Number: EPA-HQ-OAR-2009-0923-1099-11

Organization: New Mexico Gas Company

Commenter: Curtis J. Winner

Comment Excerpt Text:

Proposed 40 C.F.R. §98.232(e) and (i) would require NMGC to report fugitive emissions from "connectors" from natural gas transmission compression and natural gas distribution above ground meter regulators. The definition of "connectors" includes every no welded section of pipe. On our facilities that can mean approximately 100 connectors on a single meter and regulator. We do not have an inventory of all the connectors on all our meter regulators. Including connectors would exponentially increase the cost of performing annual leak surveys and would be very time consuming and expensive to inventory for a component count.

Response: The commenter makes assumptions which are not consistent with today's final rule. Equipment leaks in gas transmission and distribution are based on leak surveys and leaker factors, no inventory of all components (e.g. connectors) is required. For further information see the response to comment EPA-HQ-OAR-2009-0923-1065-4.

Comment Number: EPA-HQ-OAR-2009-0923-1156-9

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

M&R Stations:

Laclede recommends that EPA, in its final rule, abandon altogether the requirement for LDCs to conduct a detailed inventory of every M&R station for the purpose of developing a list of components to which an emission factor would then be applied. Depending on how EPA defines M&R stations, Laclede's distribution system has hundreds, if not thousands of such stations, with dozens of different configurations.

However, if EPA does proceed with a requirement to inventory and leak inspect M&R station components for fugitive emissions, M&R stations should be defined as "City Gate" stations only, having a suggested design flow rating of 1,000 cubic feet per hour (one Mcfh) or greater. We also request that EPA clarify that commercial/industrial meter sets serving individual customers are not included in EPA's definition of M&R stations.

If it is EPA's intent to also include distribution regulator stations (pressure reduction only, no gas metering) under the umbrella of M&R stations, these should be defined separately. The definition of a distribution regulator should include the fact that they may be aboveground or in belowground vaults and they are owned/operated by the LDC to control the flow and pressure of gas into and/or through the distribution system. A suggested threshold for including such stations in the requirements of this rule would be to only count those with a design capacity of one Mcfh or greater.

Response: Today's final rule has been clarified to not include customer meters for the natural gas distribution segment and require annual equipment leak detection surveys only at custody transfer city gate stations. Please see the Section III.B.2 of the preamble for further information. EPA does not agree to impose a one Mcfh lower limit on station throughput for equipment leak surveys, although EPA does not anticipate that any custody transfer city gate station for an LDC that exceeds the 25,000 tonne CO₂e reporting threshold would be that small. This limit appears to be associated with the mistaken interpretation that today's final rule requires equipment leak detection surveys of individual M&R stations, above and below ground. For further information, please see Section II.F of the preamble and the response to comment EPA-HQ-OAR-2009-0923-1065-4.

Comment Number: EPA-HQ-OAR-2009-0923-1099-3

Organization: New Mexico Gas Company

Commenter: Curtis J. Winner

Comment Excerpt Text:

The impacts and burdens of the proposed rule would be increased by many orders of magnitude if you include commercial and residential M&R equipment in the requirement to conduct annual leak surveys. Our company has about 270 city gate stations and over 500,000 M&R stations (if you include customer meters).

Response: Leak detection is not required at all of the meter and regulator stations in today's final rule, only custody transfer city gate stations. Please see the response to EPA-HQ-OAR-2009-0923-1065-4. Today's final rule has been clarified to not include customer meters for the natural gas distribution segment. Please see the Section III.B.2 of the preamble for further information.

Comment Number: EPA-HQ-OAR-2009-0923-0065-1

Organization:

Commenter: G. Olson

Comment Excerpt Text:

Tracking of greenhouse gas emissions should include offshore as well as onshore drilling operations. Please ensure that all drilling operations - on shore and off shore - be included.

Response: EPA does not agree to include offshore drilling by mobile platforms in subpart W. However emissions from offshore drilling activities on the production platform are included in subpart W. For further details see response to comment EPA-HQ-OAR-2009-0923-1201-17. Subpart W does include emission from onshore drilling because many of those sources contribute significantly to onshore production GHG emissions. See Background TSD (EPA-HQ-OAR-2009-0923-0027) for more information.

Comment Number: EPA-HQ-OAR-2009-0923-1155-14

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

We strongly oppose EPA's proposal to use a much less rigorous standard of measurement and quantification for offshore sources than for onshore sources. Offshore petroleum and natural gas systems can be very significant contributors to GHG emissions; they must be held to the same standard as an equivalent sized onshore facility, and must be required to follow all the same reporting requirements as an onshore facility (listed at § 98.232). EPA proposes to use the Minerals Management Service (MMS) Gulfwide Offshore Activities Data System (GOADS) air quality data collection system for tracking and reporting GHG emissions from offshore petroleum and natural gas systems and expand the GOADS system to include state waters and other OCS regions. We do not support the use or expansion of the GOADS database to separately track offshore GHG emissions. The GOADS database is currently limited to production platforms and jackup rigs at production platforms, excluding Mobile Offshore Drilling Units (MODUs), Contractor Equipment and Portable emission sources supporting offshore operations. GOADS also produces very cursory emission estimates based on fuel use and operating hours.

Therefore, we request that EPA require Offshore Operators to include all the same source categories as onshore operations, including contractor and portable sources and MODUs, when computing the Entity and Reporting Thresholds, and be required to collect and report the equivalent data required for an onshore facility into the EPA MRR database. We request that EPA add Offshore Enhanced Oil Recovery (EOR) projects to the MRR). While it is currently less common to conduct EOR offshore, we anticipate technology growth will expand EOR use offshore in the future.

Response: EPA disagrees that GOADS is not rigorous enough for the goals of the MRR. EPA carefully reviewed the MMS (now Bureau of Ocean Energy Management, Regulation, and Enforcement, BOEMRE) "Gulfwide Emissions Inventory Studies" (GOADS) methodology for reporting of GHG emissions from the offshore petroleum and natural gas industry segment finding it sufficiently comprehensive to inform future policy. For more information, please see the rulemaking docket (EPA-HQ-OAR-2009-0923) under "Alternative Methodologies." Today's final rule retains this requirement for this industry segment. EPA's decision to utilize the existing MMS GOADS system for reporting offshore emissions was based on the following considerations. First, the GOADS system is an existing process for reporting emissions in Gulf of Mexico (GOM) Outer Continental Shelf (OCS) offshore waters that comprehensively covers all platforms in the Gulf of Mexico OCS, which is a major portion of the offshore population. Subpart W expands this existing methodology to platforms in state and non-GOM OCS waters. Operators in the Gulf of Mexico OCS jurisdiction understand the monitoring methods in GOADS and have existing systems in place to collect their required data. Therefore, using GOADS allows EPA to collect greenhouse gas data for offshore sources by leveraging an existing reporting program, and scaling it to include other offshore areas at a reasonable cost burden.

Second, the current GOADS methodology includes the same equipment leak, vented and flare emission sources as onshore production in subpart W. In addition, emissions from drilling

activities on the production platform are included in subpart W. The linkage of the GOADS system, managed by BOEMRE, into the EPA's MRR will improve the effectiveness of the GOADS system itself by aggregating all offshore data under the existing BOEMRE reporting mechanism. EPA has determined that the GOADS monitoring system, selected for the offshore petroleum and natural gas production industry segment, is adequate for GHG data collection needs for offshore production. Examples of GOADS more rigorous methods include collection of monthly data on venting and flaring, and starting in 2010, BOEMRE requires a meter on all flare headers. This will allow more rigorous GOADS methodology improvements to be implemented over time across the entire offshore sector without substantially increasing the cost burden to industry.

Enhanced oil recovery operations in offshore petroleum and natural production is a source which EPA assumes will be added by BOEMRE to the Gulfwide Inventory and the GOADS data collection if and when it becomes a significant emission of criteria air pollutants and GHGs. BOEMRE also evaluates the mobile emissions associated with Gulfwide petroleum and natural gas operations, including mobile drilling rigs as well as marine and air transportation activities.

Comment Number: EPA-HQ-OAR-2009-0923-1155-7

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

Source List

The number of Subpart W sources proposed in the April 2010 MRR has substantially improved from the 2009 proposal and now incorporates onshore production and distribution facilities and portable units (e.g. drilling rigs, wellwork, etc.). EPA notes that inclusion of onshore production and distribution facilities resulted in estimated fugitive and vented emissions that are more than triple the estimated emissions in the initial rule proposal for petroleum and natural gas systems. We commend EPA for this more comprehensive source list. This will enable EPA to collect more accurate and relevant data.

We do, however, request that EPA ensure that all potentially significant GHG emission sources are included in the rule for both onshore and offshore petroleum and natural gas systems. The same level of emission estimating rigor, emission thresholds, and reporting and verification requirements should apply to a source type regardless of whether it is found onshore or offshore, because global warming does not recognize shoreline boundaries. The rule, as currently drafted, has a much less rigorous standard of measurement and quantification for offshore sources. Because offshore petroleum and natural gas systems can be very significant contributors to GHG emissions, they should be held to the same standard as an equivalent sized onshore facility.

Important Note: The recommendations made in these comments are intended to be applied as mandatory requirements for both onshore and offshore sources, unless otherwise specified.

Response: EPA agrees that all potentially significant GHG emission sources are included in both onshore and offshore production segments. Please see EPA’s response to EPA-HQ-OAR-2009-0923-1155-14.

Comment Number: EPA-HQ-OAR-2009-0923-1155-18

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

Field Gas Combustion

We support WCI’s recommendations on field gas combustion. We agree that there should be mandatory reporting of all combustion sources used in the petroleum and natural gas production sector. Subpart C addresses GHG emissions from combustion equipment using commercial fuel, but does not adequately address combustion sources that use field gas. We agree that Subpart W should require emission reporting of all combustion sources, whether using commercial fuel or field gas). The GHG emissions reporting should be based on metered gas volumes. Canadian government officials participating in the WCI Committee also support field gas metering. Canada requires petroleum and natural gas facilities to meter fuel gas use that exceeds 500 cubic feet per day.¹⁶

Response: EPA agrees with this comment in part. Today’s final rule includes stationary and portable combustion in onshore production, however, it includes the option to use engineering estimates or company records, in lieu of a permanent or temporary flow meter, to quantify the field gas sent to the combustion unit. In addition, EPA requires in today’s final rule only reporting of equipment count by type , not combustion emissions, for small external combustion sources (e.g. heaters) with a rated heat input capacity equal to or less than 5 mmBtu/hr. For more information on the threshold, please see the rulemaking docket (EPA-HQ-OAR-2009-0923) under “Equipment Threshold for Small Combustion Units.”

Comment Number: EPA-HQ-OAR-2009-0923-1155-31

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

EPA’s proposed rule includes flaring in the fugitive emission category. Flares are combustion sources and are included in EPA’s combustion equipment inventories for criteria air pollutants, and in current industry GHG combustion equipment inventories. Flares are a large source of GHG emissions. We recommend that all flare sources be required to report GHG emissions, and these emissions be included in the combustion equipment category as a standalone source. While

¹⁶ WCI Technical Committee Meeting, May 26, 2010.

some operators have taken steps to minimize flaring emissions, this is still a very large viable GHG emission reduction target, with known cost-effective emission reduction opportunities.

Response: Combustion emissions from flares must be reported under today's final rule. Specifically, onshore production, offshore production and natural gas processing, must report the CO₂, CH₄, and N₂O combustion emissions from each flare. Other segments are required to report combustion emissions for all sources which may leak or vent emissions into flare lines.

Comment Number: EPA-HQ-OAR-2009-0923-1201-19

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

EPA Should Consider Including Indirect Emissions and Emissions from Petroleum and Natural Gas Pipeline Segments in the Final Reporting Rule.

EPA's proposed reporting rule does not appear to include a requirement for reporting indirect emissions related to oil and gas exploration and production. Generally, the various existing state and national GHG reporting registries and rules require reporting of indirect emissions from the oil and gas sector. The California Climate Action Registry (CCAR) protocol, for example, includes indirect emissions reporting from imported steam as well as heating, cooling and electricity from cogeneration. The Climate Registry also requires reporting of indirect emissions.¹⁷ New Mexico's GHG reporting rule requires that a source include emissions from "purchased electricity, heat or purchased steam that are used as part of the operation."¹⁸

The Western Regional Air Partnership (WRAP) protocol development effort investigated indirect emissions and reported the following:

The requirement to report [indirect] emissions [associated with electricity, steam, heating or cooling] in part reflects the existence of standard, relatively accurate and straightforward methodologies for the estimation of these emissions... While emissions from purchased electricity are generally not the dominant emissions source for the E&P sector, they are nonetheless significant. Furthermore, although purchased steam is not a predominant source of emissions for the sector as a whole, it can be a major emissions source for some companies operating in heavy oil and oil sands fields.

We strongly urge EPA to include indirect sources of electricity and heat in its mandatory reporting rule

¹⁷ The Climate Registry, General Reporting Protocol, version 1.1, May 2008, Appendix D, p. 171, available online at http://www.wrapair.org/ClimateChange/GHGProtocol/docs/2008-10_Proposal_ATTACHMENT_5_SAIC-TCR_General_Reporting_Protocol.pdf

¹⁸ See NMAC 20.2.87.201B. and C. and p. 3 of the "New Mexico Greenhouse Gas Mandatory Emissions Reporting Emissions Quantification Procedures For 20.2.73 NMAC and 20.2.87 NMAC" available online at http://www.nmenv.state.nm.us/aqb/GHG/documents/NM_GHGEI_quantif_procedures_2009.pdf

Response: Part 98 does not require reporting of indirect emissions at this time. See the preamble to The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98). However, for subpart W, combustion emissions on drilling rigs and other portable equipment at well sites shall not be considered “indirect emissions” even if those emissions are generated by rented, leased or contracted equipment and result from generation of electricity or steam for use in the production operations. For more information see response to EPA-HQ-OAR-2009-0923-0049-3. EPA does not agree to include emissions from gas transmission pipeline segments. See details of this decision process in the TSD Section 4.c.

Comment Number: EPA-HQ-OAR-2009-0923-1201-20

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

Another important source of GHG emissions on Alaska’s North Slope is the fugitive emissions associated with the transport of marketable crude oil from the North Slope oil fields. The transport system in NSB includes the Trans Alaska Pipeline System (TAPS), which consists of 800 miles of pipeline and includes numerous pump stations along the North Slope. Evaporation losses from storage, filling and unloading activities and fugitive equipment leaks are the primary sources of GHG emissions from this source.

EPA continues to propose that fugitive emissions from petroleum and natural gas pipeline segments be excluded from reporting requirements due to “the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly.”¹⁹

While we recognize the complexity of defining a reporting entity for this sector, we strongly urge EPA to commit to studying the matter further and to include this source in a future update to this reporting rule if reasonable reporting responsibilities can be established.

Response: EPA will continue to monitor new information and data relevant to emission sources and methodologies relevant to petroleum and natural gas pipeline segments, and use all information to inform possible future changes to the mandatory reporting program.. Transmission pipelines were not included in today’s final rule because they did not represent a large percentage of emissions from the gas transmission sector as outlined in the Technical Support Document (TSD) for today’s final rule found in docket (EPA-HQ-OAR-2009-0923). For further information, see Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD EPA-HQ-OAR-2009-0923-0027.

¹⁹ 75 FR 18616.

Comment Number: EPA-HQ-OAR-2009-0923-1201-21

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

CCAR is developing a protocol for the natural gas transmissions and distribution sector, and many of the attributes of that sector's definitions may be applicable to the petroleum transmission sector. As with the natural gas transmission process, the transfer of custody from oil production operations to pipelines should constitute the boundary beyond which the transmission "facility" can be defined. Emissions released up until that transfer of custody should be included in basin-level reporting. Beyond the transfer of custody, the reporting entity should include the oil transmission and storage equipment and could include corporate-level reporting.

Response: EPA disagrees with the suggested definition of facility for onshore production and transmission. In developing the petroleum and natural gas industry segments, EPA considered many existing facility definitions, including custody transfer and corporate-level reporting. Today's final rule chose definitions that comprehended the complex nature of petroleum and natural gas ownership/operational control and boundaries which are clear delineations of equipment which has significant emissions. Please see the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-3568.3-4

Organization: Sierra Club

Commenter: Anne Harvey

Comment Excerpt Text:

With regard to fugitive emissions, we're concerned that EPA's proposal allows companies to fix fugitive emission sources before quantifying emissions for the reporting rule. While we understand that this approach may provide an incentive for quick repairs, it may also lead to significant underreporting. We encourage EPA to consider ways to document such repairs and to account for emissions that escape before faulty equipment is fixed.

Response: Because the Mandatory Reporting Rule has the primary intent of tracking emissions for the purpose of informing future policy, and not mandating or tracking emissions reduction, EPA deems it inappropriate to account for voluntary repairs. Today's final rule does provide methods for adjusting annual emission factors for equipment leaks to account for less than a full year of emissions if more than the one mandated, full facility leak surveys is performed. The owner/operator can not survey only the repaired leaks to cap their annual emissions. This requirement that additional, voluntary leak surveys cover the entire facility may find new leak sources not identified in the first, mandatory survey, which must be reported starting at the date that the source was previously found not leaking. Therefore, given the random nature of equipment leaks, multiple surveys are as likely to find new leaks as to cap the emissions from repaired leaks. In the case of crude oil and condensate stock tank emissions, if the company has records of gas-liquid separator dump valves leaking gas through the liquid level control valve

and through the stock tank, they must apply a multiplier factor to the emissions whether the valve was repaired or not.

Comment Number: EPA-HQ-OAR-2009-0923-3568.5-2

Organization: Environmental Defense Fund

Commenter: Peter Zalzal

Comment Excerpt Text:

For example, EDF strongly supports EPA's inclusion of the onshore oil and natural gas production segment of the industry in the reporting rule which EPA estimates accounts for 66 percent of fugitive emissions.

Response: EPA agrees with the inclusion of the onshore oil and natural gas production segment in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1013-1

Organization:

Commenter: James W. Nunn

Comment Excerpt Text:

Additional sources of fugitive emissions that would benefit from inspection with the infrared cameras are presented in blue type and underlined. The current Sub Part W suggested sources to be inspected are in black type with no underline:

Onshore Production – reciprocating compressor rod packing venting (if not equipped with vent line) (75 FR 18637);

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): All flares and thermal oxidizers; open ended vent pipes from any source; all vapor recovery units; all storage, transshipment or holding tanks; glycol dehydration unit vents or catch tanks; holding ponds and catch basins; recently repaired or installed equipment. NOTE: Although the above items seem numerous inspection of each source takes only a few seconds and operating personal could tag emission points with high visibility, non-adhesive plastic tape.

Offshore Production – not required (MMS GOADS methodology appears to use component counts / emission factors for fugitive emissions)

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): Circle the offshore platform in a helicopter or fixed wing aircraft to identify fugitive emissions. An eight hour inspection of the platform with the infrared camera should pinpoint all emission sources. Again, although the above items seem numerous inspection of each source takes only a few seconds and operating personal could tag emission points with high visibility, non-adhesive plastic tape.

Natural Gas Processing – reciprocating compressor rod packing venting (if not equipped with

vent line); Emissions from “valves, connectors, open ended lines, pressure relief valves, meters, and centrifugal compressor dry seals” (75 FR 18637)

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): All flares and thermal oxidizers for emission of unburned hydrocarbon gas; all vent pipes from any source; all vapor recovery units; all storage, transshipment or holding tanks; glycol dehydration unit vents or catch tanks; holding ponds and catch basins; recently repaired or installed equipment. NOTE: Although the above items seem numerous each inspection takes only a few seconds and operating personal could tag emission points with high visibility, non-adhesive plastic tape.

Natural Gas Transmission Compression – Emissions from condensate storage tanks (75 FR 18640); reciprocating compressor rod packing venting (if not equipped with vent line); emissions from “connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines” (75 FR 18637);

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): All flares for emission of unburned hydrocarbon gas.

Underground Storage – reciprocating compressor rod packing venting (if not equipped with vent line); Emissions from “connectors, block valves, control valves, compressor blowdown valves, pressure relief valves, orifice meters, other meters, regulators and open ended lines” (75 FR 18637);

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): All flares for emission of unburned hydrocarbon gas.

LNG Facilities – reciprocating compressor rod packing venting (if not equipped with vent line); fugitives from “valves, pump seals, connectors, vapor recovery compressors, and other fugitive sources” (75 FR 18637)

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): All flares for emission of unburned hydrocarbon gas.

Distribution Facilities – “above ground meter regulators and gate station fugitive emissions from connectors, block valves, control valves, pressure relief valves, orifice meters, other meters, regulators, and open ended lines” (75 FR 18637) (note that pipeline mains and service lines do not require optical imaging – they use population emission factors)

Recommend adding: Inspect the following with Optical Gas Imaging systems (i.e. cryogenically cooled infrared cameras): pipeline mains and service lines.

Response: EPA notes the prevalence of other methodologies for leak detection and has included several leak detection techniques including infrared optical gas imaging cameras, infrared laser detectors, flame ionization detectors, catalytic oxidation/thermal conductivity detectors, and soap solutions as per Method 21. With regard to flares, today’s final rule requires quantification of emissions by estimation of the sources and types of gas sent to the flares over the reporting year rather than by Optical Gas Imaging cameras because a single detection would not be representative of the whole year. EPA is also not requiring leak detection of underground distribution pipeline mains and service lines because the burden would not justify the additional

emissions coverage inherent in reporting miles of such pipelines and using published emission factors. Please see Section II.F of the preamble for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1044-4

Organization: Colorado Department of Public Health and Environment

Commenter: Kirsten King

Comment Excerpt Text:

Addresses emissions outside of the PSD and Title V Permitting Programs' purview. Non-road engines, temporary emission sources and otherwise insignificant activities are now required to be reported in aggregate. For example, emissions from drill rigs on-site for more than 30 days, drilling emissions themselves, and pneumatic devices whose individual emissions may fall below permitting thresholds are now required to be reported in aggregate.

Response: The major sources of GHG emissions in onshore production, such as well drilling/workovers and completions, well liquids unloading and stock tanks, are required to be reported by field within a basin. This disaggregation should provide useful emissions data in discrete geographic areas for other air emissions programs. Smaller, uniformly dispersed sources, such as pneumatic devices and pneumatic pumps are reported in aggregate in a basin. Other industry segments, i.e. processing facilities, transmission compressor stations, gas storage, LNG storage, LNG import/export terminals, and offshore platforms, the facility definition is a discrete location. Distribution, like onshore production, has a broad geographic facility definition to obtain reasonable coverage from widely dispersed, smaller emission sources. Regarding the relationship of Subpart W to other CAA programs, see EPA-HQ-OAR-2009-0923-1044-1.

Comment Number: EPA-HQ-OAR-2009-0923-1059-15

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

MDU has a significant concern with the requirements under GHG Emissions Reporting Rule Subpart C that appear to apply to the stationary source emissions on natural gas distribution, transmission and production systems and operations per Subpart W Rule requirement §98.232(k). This requirement would be extremely burdensome since GHG emissions from any small heater, not meeting the definition of emergency or portable, within a natural gas distribution system would need to be reported, and not all of these types of small equipment are even inventoried. The EPA should either apply a de minimis threshold for Subpart C sources to be reported under the Subpart W Rule, or clarify that the Subpart C stationary source emissions are not required to be reported by all Subpart W category sources.

Response: EPA agrees with the commenter. EPA requires in today's final rule reporting of equipment count by type only, not combustion emissions, for small external combustion sources (e.g. heaters) with a rated heat input capacity equal to or less than 5 mmBtu/hr. For more

information on the threshold, please see the rulemaking docket (EPA-HQ-OAR-2009-0923) under “Equipment Threshold for Small Combustion Units.”

Comment Number: EPA-HQ-OAR-2009-0923-1080-22

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Aka recommends that in Section § 98.232(d) only the three significant sources should be listed (1) Reciprocating compressor rod packing venting, (2) Centrifugal compressor wet seal degassing venting, and (3) Flare stacks. This section as written requires emissions to be reported from nine sources listed in this paragraph. EPA has stated in the preamble that only three of these sources are significant contributors of emissions under this subpart. Therefore only those three should be reported.

Response: EPA disagrees with the comment because it is taken out of context and misquoted. While the three sources cited by the commenter are “major sources,” today’s final rule includes four others, namely blowdowns, dehydrators, acid gas removal vents and equipment leaks, which were determined to collectively contribute significant emissions. Please see the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027) for further information on the inclusion of emission sources in natural gas processing.

Comment Number: EPA-HQ-OAR-2009-0923-1156-12

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Annual Leak Sampling for Reciprocating Compressors:

The proposed rule at 40 CFR 98.233(p) requires an annual estimate of emissions from reciprocating compressors. Compressor facilities have redundant systems to prevent a potentially explosive accumulation of natural gas within the compressor building, including automated leak detection systems. Minor leakage does sometimes occur, but the source is quickly identified either during equipment operation or when the equipment is shut down. Furthermore, the compressors are typically fueled by and/or compress odorized natural gas, which further facilitates leak detection.

Compressors stationed at Laclede’s underground storage field may operate only sporadically, or on a semi-regular schedule, but hardly on a continuous basis, depending on weather patterns and other factors that can influence gas storage injection and withdrawal requirements. Individual compressor units often operate less than 1,000 hours per year. We recommend that the final rule exempt such infrequently used compressor units from the annual requirement for leak testing,

specifically those that operate no more than 1,000 hours per year, as well as any units used exclusively to compress natural gas that is odorized.

Response: EPA disagrees with the exemption of compressor units based on how many hours they operate each year because large emissions can occur when compressors are operating and also when they are shut-down under pressure or depressurized. In today's final rule, EPA requires measurements of emissions from compressors in the different operating modes. Please refer to the rulemaking docket EPA-HQ-OAR-2009-0923 under "Compressor Modes and Threshold".

EPA does not agree that equipment containing odorized gas or subject to safety requirements of the Department of Transportation meet rationale for requiring the reporting of GHG emissions because odor detection and "lower explosive limit" instruments required for safety do not identify leaking sources, and in many cases, especially equipment not housed in a building, the methane equipment leaks will dissipate into the air without accumulating sufficiently to be detected by odor or cause a safety issue (i.e. detection above the lower explosive limit action level). For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements" and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-1156-17

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Please consider that individual large combustion units, such as compressors and natural gas heaters, vaporizers, etc. are often only used by an LDC on a limited, seasonal basis for a relatively few number of days during the peak winter period. An LDC may need to have many such stations, spread out at numerous locations, to ensure uninterrupted gas service to its customers on the most extreme cold winter days. However, in the case of Laclede and many other LDCs, these are not Title V (Major) sources, and actual emissions from these units are far below any other reportable threshold. Laclede believes it is inappropriate for EPA to include these types of units in the reporting scheme. We strongly urge EPA to restructure this portion of subpart W so as to not trigger reporting under subpart C for sources that were not otherwise covered, simply by virtue of LDC calculated fugitive emissions exceeding 25,000 metric tons/yr CO₂e.

Response: Upon further analysis and review, EPA has determined that small external combustion sources in onshore production and natural gas distribution with heat input rating of 5 mmBtu or less do not have to report combustion emissions under subpart W, only the number by type to subpart W. However, combustion equipment above this threshold will have to report combustion emissions under subpart W for onshore production and natural gas distribution, when the sum of process and combustion emissions for a facility as defined in subpart W exceeds 25,000 tCO₂e.

Comment Number: EPA-HQ-OAR-2009-0923-1167-17

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

A reduced number of onshore production emission sources required to report GHG emissions under Subpart W (i.e. Section 98.232(c)) and Subpart C.

Remove sources identified as insignificant by the Noble U.S. inventory analysis. The Noble Energy analysis of the U.S. onshore petroleum and natural gas production GHG emissions inventory identified the following emission sources as very likely being insignificant sources: Centrifugal Compressor Wet Seal Oil Degassing Vents, Acid Gas Removal (AGR) Vent stacks, Gas Well Venting During Conventional Well Completions, Dehydrator (Desiccant) Venting, Hydrocarbon Liquids Dissolved CO₂, Gas Well Venting During Conventional Well Workovers, EOR Injection Pump Blowdowns, Well Testing Venting and Flaring, Gathering Pipeline Fugitives, Reciprocating Compressor Rod Packing Vents (Blowdown Leak & Blowdown Vent (Unit Isolation Valve Leak), Coal Bed Methane (CBM) Produced Water Emissions, and Natural Gas Driven Pneumatic Pumps.

Noble recommends that these sources be acknowledged as insignificant sources and excluded from reporting for onshore petroleum and natural gas production. Alternatively, these immaterial/insignificant sources could be re-proposed for later addition as necessary to meet inventory and data quality objectives

Response: EPA disagrees with the commenter that centrifugal compressor wet seal oil degassing vents, acid gas removal vent, gas well venting during well completions and workovers without hydraulic fracturing, dehydrator (desiccant) venting, EOR injection pump blowdowns, well testing venting and flaring, reciprocating compressor rod packing vents and natural gas driven pneumatic pumps are not significant sources of emissions and has retained emissions from these sources in today's final rule. The selection of source categories is outlined in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027). EPA agrees that coal bed methane produced water is not a significant source emissions and today's final rule does not include this source. For further information please see the response to EPA-HQ-OAR-2009-0923-1151-129.

Comment Number: EPA-HQ-OAR-2009-0923-1167-49

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Reporting and recordkeeping requirements are identified in Section 98.236 and Section 98.237, and procedures for missing data are identified are Section 98.235. Noble Energy recommends

revisions or clarification to these sections to eliminate requirements that are not practical or do not add substantive value while incurring unwarranted costs.

Response: EPA has made clarifications and/or changes to today's final rule to simplify reporting requirements and reduce the burden on the industry. For further details, please see Sections II.E, II.F and III.B of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1167-5

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Noble analysis of the U.S. onshore production GHG emissions inventory indicates about a third of the affected emission sources contribute about 80% of the onshore production emissions. GHG emissions reporting should be limited to these and select other sources. The majority of the proposed emission sources for this sector are insignificant. The inclusion of these sources adds unnecessary and unproductive reporting burden, and it is recommended that they be removed from the reporting requirements.

Response: EPA disagrees with the comment because some emissions in onshore production are understated in the US GHG Inventory. The selection of source categories is outlined in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027). .

Comment Number: EPA-HQ-OAR-2009-0923-1198-2

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment Excerpt Text:

The proposal includes the entire natural gas system, from the well head to the burner tip and emissions from every piece of equipment, regardless of size or emissions would have to be inventoried. Many of these sources are de minimis sources and are not significant sources of GHG emissions. It is not practical, not necessary, to include such sources in the inventory of GHG emissions from the natural gas industry.

Response: EPA disagrees with the comment. The selection of source categories is outlined in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027). Furthermore, EPA has clarified the original intent of subpart W to not include emissions from customer M&R stations. For further information, see the Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1298-72

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Stationary and Potable Combustion Sources: Page 18626 of the Subpart W preamble states:

This supplemental rulemaking proposes methodologies for reporting fugitive and vented emissions from oil and gas facilities. Once triggering the proposed rule, all of these facilities would also have to report emissions from stationary combustion.

Because EPA has defined “facility” as the entire hydrocarbon basin for production sites, the definitions of facility between Subparts C and W becomes muddled. Subpart C uses the standard CAA definition of facility and, as mentioned above, it should also apply to Subpart W. Notwithstanding the definition differences between the two MRR subparts, the ill-defined definition of “facility” under Subpart W pulls into monitoring, recordkeeping, and reporting numerous extremely insignificant sources such as production site heaters, boilers, and generators (typically rated less than 1 MMBtu/hr). Under the proposed rule, each of potentially thousands of production site would be required to install and calibrate meters to measure fuel continuously to calculate emissions according to the Subpart C Tier 1 methodology. Since operators do not currently measure fuel consumption for such units at their production sites, this creates an enormous burden that is unwarranted for these insignificant emission sources. If EPA insists on proceeding with the Subpart W definition of facility, IPAMS requests that EPA explicitly exclude emissions from these insignificant stationary combustion sources.

Response: EPA requires in today’s final rule only reporting of equipment count by type, not combustion emissions, for small external combustion sources (e.g. heaters) with a rated heat input capacity equal to or less than 5 mmBtu/hr. For more information on the threshold, please see the rulemaking docket (EPA-HQ-OAR-2009-0923) under “Equipment Threshold for Small Combustion Units.” EPA disagrees with the comment on onshore production facility definition. Please see response to comment EPA-HQ-OAR-2009-0923-1044-1.

Comment Number: EPA-HQ-OAR-2009-0923-1300-6

Organization: Texas Oil and Gas Association

Commenter: Deb Hastings

Comment Excerpt Text:

The rule should allow for simplified methods or outright exemptions for devices and operations that are below a size or threshold level. Such units may include, but are not limited to, 'no-bleed' pneumatic controllers; storage tanks and gas dehydrators with low throughputs; small compressors; small combustion units; and similar sources.

Response: Upon further analysis and review, EPA has developed thresholds below which certain sources could report using simplified methods. For further details, please see EPA-HQ-OAR-2009-0923 under “Equipment Threshold for Tanks,” “Equipment Threshold for Dehydrators,” “Equipment Threshold for Small Combustion Units,” and “Equipment-Level Population

Emission Factors for Onshore Production.” No-bleed pneumatic controllers are not listed as a source in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-3568.1-4

Organization: American Gas Association

Commenter: Pamela Lacey

Comment Excerpt Text:

Once in, those utilities would then have to estimate and report emissions for many small meter and regulator stations and city gate stations that are scattered across the state as well as the combustion emissions from sources that would otherwise not exceed the facility reporting threshold.

Response: EPA has determined that this commenter misinterpreted the rule. Today’s final rule more clearly expresses that equipment leak detection is required only for custody transfer city gate stations. For further details, please see Section II.F of the preamble. EPA has also included a threshold for external combustion equipment in onshore production and natural gas distribution segment. For further information, see EPA-HQ-OAR-2009-0923 under “Equipment Threshold for Small Combustion Units.”

Comment Number: EPA-HQ-OAR-2009-0923-1068-1

Organization:

Commenter: Michael Leonard

Comment Excerpt Text:

(98.230) The reporting requirements of this rule may subject personnel to potentially hazardous situations including: Additional time spent in hazardous locations, increased exposure to chemicals, common hazards associated with increased driving time to/from locations, and possible personnel injury during equipment installation. We propose that a study be conducted to determine the environmental versus safety tradeoffs of this subpart.

Response: In developing the petroleum and natural gas industry segment, EPA considered methods currently being used safely throughout the industry to monitor and measure emissions. For further information, please refer to EPA-HQ-OAR-2009-0923-1167-57.

Comment Number: EPA-HQ-OAR-2009-0923-1156-11

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Laclede further wishes to point out that it is very common for M&R stations to be located in belowground, concrete vaults. As a standard safety precaution, before system technicians may enter any vault containing gas equipment, a leak detection device is used to check for the

presence of a gaseous atmosphere within the vault. It is extremely rare for natural gas to be detected in such vaults. This not only demonstrates how gas-tight are the M&R components within the vault, which by extension applies equally true to aboveground stations, but further supports Laclede's comment that applying an emission factor to every station component, multiplied by the number of similar components system-wide, will not produce a meaningful representation of fugitive emissions.

Response: EPA does not agree that the use of population emission factors will not produce a meaningful inventory report. There are two parts of the emissions reporting: activity data and emissions data. Wherever possible, EPA has attempted in today's final rule to require methods that have a cost burden proportionate to the total emissions expected to be reported. In the case of below grade M&R stations, the U.S. National Inventory demonstrates, as this commenter states, that aggregate emissions will be relatively small. However, to inform future policy, EPA requires a better identification of the activity data for this source. Above ground custody transfer city gate stations do require in today's final rule a once per year leak survey, but provides leaker factors from recent studies of distribution gate stations to make the emissions estimate most cost effective. Furthermore, non-custody transfer gate stations have an even lower burden, applying a custom company derived emissions factor per meter run to each of those gate stations.

Comment Number: EPA-HQ-OAR-2009-0923-1197-6

Organization: NiSource, Inc.

Commenter: Kelly Carmichael

Comment Excerpt Text:

Unsafe-to-monitor source measurements - NiSource strongly recommends that provisions to exclude "unsafe-to-monitor" emission sources be provided in the rule. NiSource also proposes that provisions to include "difficult-to-monitor" emission sources be also provided in the rule.

Response: In developing the petroleum and natural gas industry segment, EPA considered methods currently being used safely throughout the industry to monitor and measure emissions. For further information, please refer to EPA-HQ-OAR-2009-0923-1167-57.

Comment Number: EPA-HQ-OAR-2009-0923-1198-12

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment Excerpt Text:

As proposed, this rule does not recognize the inherent dangers and difficulties related to accessing some sources, especially considering the rugged terrain in West Virginia. The original proposed rule at least provided that "component fugitive emissions sources that are not safely accessible within the operator's arm's reach from the ground or stationary platforms are excluded." However, the re-proposed Subpart W does not include this exemption. The EPA should reinstate this exemption, and others, in the final rule so that unsafe and difficult to monitor provisions are incorporate to ensure the safety of personnel and limit the undue burden

of reporting. Further, the proposed rule requires the use of leak detection methods which are inherently unsafe. - - optical gas imaging equipment. This equipment cannot be used in some locations due to the combustible nature of natural gas. WVONGA requests that the EPA include other optional detection methodologies which are safe and more commonly used in the industry.

Response: In developing the petroleum and natural gas industry segment, EPA considered methods currently being used safely throughout the industry to monitor and measure emissions. For further information, please refer to the response to EPA-HQ-OAR-2009-0923-1167-57. EPA has added other equipment leak detection options in today's final rule; please see Section II.F of the preamble for further details. However, the infrared leak imaging cameras are retained in today's final rule for detecting equipment leaks that cannot be safely accessed with a hand held instrument or do not present a reflective background for an IR laser detector. While these devices are not yet certified as explosion proof, EPA has approved these devices for use in the VOC LDAR programs as an alternative work practice to the Method 21 sniffer leak detection devices, which does not relieve an operator from following existing safety work practices.

Comment Number: EPA-HQ-OAR-2009-0923-1298-39

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Reciprocating compressor rod packing venting

Section 98.233(p): Pump jack reciprocating compressors do not typically have a vent line, and it is not feasible to attach a distance piece to the packing case. The packing case on a pump jack compressor is not stationary, and the packing case draws ambient air in and out with the movement of the piston. There is also a safety issue associated with attempting to have personnel close enough to monitor the pump jack compressor. IPAMS requests that EPA clearly state that this source category does not include pump jack reciprocating compressors.

Response: Today's final rule does not require detection or measurement of onshore production centrifugal or reciprocating compressor emissions. The methodology specified requires use of an emission factor for all onshore production compressors.

Comment Number: EPA-HQ-OAR-2009-0923-1015-16

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

This source (CBM produced water emissions) is not addressed in The Climate Registry's protocol for Oil and Natural Gas GHG reporting, which is largely a more-inclusive program than EPA. If TCR did not address this as a source of emissions, it is possible that this source is not expected to be a significant emitter of GHGs. As measuring emissions from this activity is currently not industry standard, PAW requests the use of BMM for the first reporting year.

Response: EPA agrees that coal bed methane produced water is not a significant source of methane emissions and in today's final rule reporting is not required. For further information please see the response to EPA-HQ-OAR-2009-0923-1151-129 and Section II.E of the preamble to today's final rule.

In today's final rule, EPA is allowing the use of best available monitoring methods under certain circumstances. Please see the response to this comment in Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1015-34

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

General Comments – Fugitive Emissions at Different Operational Modes

On page 43 of the Technical Support Document and in 98.233(p)(4), the EPA addresses fugitive emissions from compressor operations at different operational modes. In the Technical Support Document, the EPA concedes that to address this issue, operators must measure emissions for each mode the compressor is operated in and the duration of that operational mode and this will “increase the reporting burden, since measurements will have to be taken at each mode of compressor operation.” Indeed – this requirement will greatly increase the reporting burden while not addressing a significant source of GHG emissions. 98.233(p)(4) requires measurement in several operational modes: Compressor engines are generally either operational or not. Some of the operational modes are not normally encountered and this would have to be artificially reproduced in the field for the sole purpose of reporting. A compressor would not standby pressurized for any amount of time that would affect its emissions significantly as it would otherwise be offset by the fact that the compressor is operational. Therefore, requiring measurement in each mode is burdensome, difficult to schedule, and does not reflect a significant source of emissions.

Response: EPA is requiring compressor venting to be measured in “as found” mode. Please see the response to EPA-HQ-OAR-2009-0923-0055-16 and EPA-HQ-OAR-2009-0923 under “Compressor Modes and Threshold.”

Comment Number: EPA-HQ-OAR-2009-0923-1154-6

Organization: Latham & Watkins LLP

Commenter: Matthew C. Brewer

Comment Excerpt Text:

In addition, the proportion of the “midstream” sector’s fugitive emissions that would be accounted for using the non-aggregation approach would be even higher than EPA has estimated. EPA’s Background Technical Support Document estimates that fugitive emissions from reciprocal compressor leaks comprise 48% of the sector’s total emissions, which, if true, would

make reciprocal compressors by far the sector's largest source of emissions.[FN 27 - See Table titled "Inventory of Methane Emissions from Natural Gas Systems; Gas Processing Plants," BTSD, Appendix A at p. 74.] However, DCP believes that EPA's 48% figure likely dramatically overstates the contribution of compressor leaks to overall sector emissions.

The source of EPA's 48% figure for reciprocal compressors is not apparent from the BTSD. The BTSD does, in Appendix K, identify two reports published jointly by EPA and Clearstone Engineering Ltd. (Clearstone Reports) as the source of leaker emission factors for centrifugal compressors.²⁰ Yet nowhere in the Clearstone Reports is a 48% figure for reciprocal compressor fugitive emissions provided (nor can one be readily discerned using other data), and nowhere in the BTSD does EPA explain precisely what information it used to arrive at the 48% figure. Indeed, the 2002 Clearstone Report cited by EPA estimates that "fugitive equipment leaks," make up 15.7% of total emissions in the "midstream" sector, and the 2006 Clearstone Report estimates that "leaking components" account for 17% of total sector GHG emissions. It is therefore not possible to confirm or challenge EPA's methodology used to calculate its estimate that 48% of sector emissions are compressor fugitive emissions.

Similar to the Clearstone Reports, a recent paper authored by the Encana Corporation (Encana), another large "midstream" company and Gas Processors Association Member, reported that its total "vented" emissions, which would include emissions from compressor packings and seals, are much lower than EPA's 48% estimated -- only 6% of its total sector emissions.[FN 29 - See Ayala, R., Value-Adding Technologies: Improve Energy Efficiency in Encana's U.S. Operations, The American oil & Gas Reporter (May 2010), p. 90, 92, a copy of which is attached to these comments as Appendix C.]Clearly, if all of this company's vented emissions total 6% of its sector emissions, emissions from compressor packings and seals alone must be less than 6% of sector emissions.

The discrepancies between the 6% reported in the recent Encana publication, the 15.7% and 17% reported in the Clearstone Reports, and EPA's 48% estimate are too large. EPA's 48% figure -- which supposedly derives from the Clearstone reports -- has not been justified and simply is not credible. The Clearstone Reports, along with the Encana publication, indicate that were EPA to retain the non-aggregation source approach, and require reporting only from the largest, true "major" sources, it would still capture a significant, and larger than estimated, percentage of sector emissions.

Response: EPA's decision to include reciprocating compressors in the mid-stream (gas processing) segment was based on several considerations. The EPA's estimate of reciprocating compressor emissions in the proposed rule is based on the U.S. GHG Inventory alone, but has been corroborated by several studies, including a PRCI/GRI study of large reciprocating

²⁰ See Footnotes 49 and 50 of the BTSD, citing: EPA: Identification and Evaluation of Opportunities to Reduce Methane Losses at Four Gas Processing Plants Clearstone Engineering Ltd. June 20, 2002; and National Gas Machinery Laboratory, Kansas State University; and Clearstone Engineering, Ltd; Innovative Environmental Solutions, Inc. Cost- Effective Directed Inspection and Maintenance Control Opportunities at Five Gas Processing Plants and Upstream Gathering Compressor Stations and Well Sites. For EPA Natural Gas STAR Program. March 2006

compressor emissions. EPA has documented the estimate in the US GHG Inventory that reciprocating compressor emissions are 48% of gas processing segment emissions. Please see the U.S. Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2006, (April 2008), USEPA #430-R-08-005. Although the Clearstone studies and other Natural Gas STAR Program data from industry make it clear that the US GHG Inventory under estimates centrifugal compressor emissions making reciprocating compressors a smaller percentage of total process emissions. The commenter does not provide sufficient details to support their opinion that reciprocating compressor emissions are “not credible.” In all cases the level of contribution to emissions from reciprocating compressors is sufficient to merit inclusion in the gas processing segment. The purpose of the rule itself is to gather more credible data on all segments of the oil and gas industry, and to develop a more robust and consistent database of GHG emissions to inform future policy. EPA has attempted, in today’s final rule, to deploy the sources which appear to be the primary sources in each segment that total to approximately 80% of the emissions from each segment.

Comment Number: EPA-HQ-OAR-2009-0923-1155-28

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

Waste Pits

Waste pits are a somewhat unknown source of methane emissions but one that may require more attention in the future. EPA has successfully used its WATER9 modeling tool to estimate emissions from open basins at petroleum facilities and should consider expanding this tool use for the MRR. Due to the increase in tar sands activity and other unconventional drilling practices, we will almost certainly be seeing more and more of these pits in the future. Scant initial data²¹ suggest these sources may not have major emissions. However, given the dramatic differences in emissions estimates seen in other oil and gas sources and the potential for rapid growth in the number of pits utilized, EPA should not assume this source category will remain an insignificant source of methane emissions without further investigation. It would be prudent for EPA to complete further sampling and testing to verify that this source does not need to be included in future updates to this reporting rule. The growth in the number of waste pits may drive this particular source to become a cumulatively significant source of emissions and EPA must continue to monitor this source accordingly.

Response: While waste pits are not identified as a significant source in the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027), EPA will continue to track this topic and take into consideration new

²¹ Based on results from Phase 1 of an EPA (R8/ORD) study of three evaporation ponds: “Measurement of Emissions from Produced Water Ponds: Upstream Oil and Gas Study #1” (EPA/600/R-09/132 October 2009).

information in potential future changes to the rule.

Comment Number: EPA-HQ-OAR-2009-0923-1042-8

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment Excerpt Text:

§98.230(a)(6) and (7) Onshore petroleum and natural gas production. In Alaska, ConocoPhillips operates a facility that receives natural gas from various producing fields, liquefies it, and loads it onto tankers for export overseas. This facility appears to fall into both the categories of LNG Storage and LNG Import and Export Equipment at 98.230(a)(6) and (7), respectively. These two categories are treated differently under the proposed rules. To avoid confusion, we believe facilities such as ours should be captured under one or the other category. The preamble to the rule at page 18616 indicates that the LNG Storage facility definition is intended for those used for peak-shaving. This intent should be captured in the rule itself perhaps by referencing peak shaving in the LNG Storage definition.

Response: EPA requires that facilities with multiple functions to report under the industry segment for which the majority of emissions occur. Please see the response to EPA-HQ-OAR-2009-0923-1024-14 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1059-11

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

Also, MDU believes that using the more accurate emissions factors would further demonstrate that the portion of the total U.S. economy-wide GHG emissions produced from Subpart W Rule category source fugitive emissions is insignificant.

Response: EPA used the best available public data to develop the emission factors in Table W-1 through W-7 of today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1299-5.

Comment Number: EPA-HQ-OAR-2009-0923-1151-87

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Paragraph 98.232(d) should be revised from “onshore natural gas processing, report emissions...” to “onshore natural gas processing plant, report emissions...”

Response: EPA disagrees with the commenter and has not changed the rule as suggested by the commenter.

Comment Number: EPA-HQ-OAR-2009-0923-1206-11

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

GPA also suggests that the same GHGs and sources reported by processing plants under § 98.232(d) be reported by gathering compression and treating facilities under the new source category.

Response: Gathering lines and compression facilities are not included in today's final rule at this time. Please see Section II.E of the preamble for further details. Gas treating at wellheads and in processing facilities is retained in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1298-44

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Population count and emission factors

Section 98.233(r): A company-wide inventory of components would be extremely expensive and time-consuming to create for all company owned assets. In addition, maintaining the changes to this inventory for thousands of well sites and thousands of miles of gas gathering lines is not practical without a large commitment of personnel and money. It appears that EPA has greatly underestimated the costs and resource requirements to conduct the population count. In addition, the gas quality can vary at every connection to a gathering pipeline; this would require that each pipeline segment be counted and tracked separately with the associated gas analysis applied to each segment. IPAMS requests that EPA either exclude gathering pipelines from the emission inventory or allow reporters to generate an engineering estimate of the average component count per well site and/or per mile of natural gas gathering line.

In addition, to account for fugitive emissions reduction measures that the industry has undertaken in the last few years since the leaker emission factors were developed, IPAMS requests that EPA provide a provision in the final rule that allows population emission factors to be updated periodically, either by EPA or by industry in consultation with EPA.

Response: Gathering pipelines and compression facilities are not included in today's final rule. Please see Section II.E of the preamble for further details. EPA will consider new data on emission factors as EPA deems appropriate. Please see the response to EPA-HQ-OAR-2009-0923-1299-5.

1.2 SELECTION OF LEVEL OF REPORTING

Comment Number: EPA-HQ-OAR-2009-0923-1196-11
Organization: Independent Petroleum Association of New Mexico
Commenter: Karin V. Foster

Comment Excerpt Text:

II. Definition of Facility is inconsistent with other regulatory definitions

The EPA proposes the following definition for a facility:

“Onshore petroleum and natural gas production facility means all petroleum or natural gas equipment associated with all petroleum or natural gas production wells under common ownership or common control by an onshore petroleum and natural gas production owner or operator located in a single hydrocarbon basin... Where an operating entity holds more than one permit in a basin, then all onshore petroleum and natural gas production equipment relating to all permits in their name in the basin is one onshore petroleum and natural gas production facility.”

A. Common control:

Under the proposed definition, a company who operates numerous wells on both sides of the Texas-New Mexico border in the Permian Basin would be considered one facility. The IPAA comments rightly suggest that under the proposed rule, the analogous situation would be to require all McDonalds in the entire State of New Mexico to be considered as one facility because they have the same name and are franchised from a common source.

Response: EPA disagrees with the commenter. Please see response to EPA-HQ-OAR-2009-0923-1005-2 for further details.

Comment Number: EMAIL-0002-2 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923)

Organization: Gas Processors Association

Commenter:

Comment Excerpt Text:

Proposed calculation for gathering pipelines is impractical.

EPA is proposing to not include reporting of fugitive emissions from natural gas transmission pipelines due to the dispersed nature of the fugitive emissions and the fact that once leaks are found, the emissions are generally addressed quickly. EPA fails to use this same logic for natural gas gathering pipelines, which are significantly more dispersed than transmission pipelines. Gas gathering lines are generally much smaller diameter and typically operate at much lower pressures than transmissions lines, resulting in a lower potential for emissions. Some gathering pipelines even operate on a vacuum. It is also important to note that many gathering and processing companies have implemented robust programs to find and fix pipelines leaks. Contrary to the transmission pipelines, EPA appears to propose that gas processing plants and producers conduct a physical count of piping components on gathering lines and use population

factors to determine emissions. Operators then apply another factor (scf/hour/mile) to calculate GHG emissions from the pipeline segments.

GPA estimates that there are over 250,000 miles of gathering pipelines in the gathering & processing sector, and hundreds of thousands meter and valve settings, that would require physical component counts. Even more impractical, is the requirement to conduct compositional analysis at these sites to determine methane and CO₂ concentrations. Further, operators would have to track blowdowns and changes in small meter runs and pipe segments in these hundreds of thousands of insignificant locations to report GHGs as required by proposed Subpart W.

EPA has significantly underestimated the burden to industry to obtain the information to calculate the emission estimate for gathering pipelines. It is also noted that the emission factor for the gathering pipeline segments (2.81scf/hour/miles) is derived from an unexplained total pipeline emission estimate of 6.6 Bscf (see TSD page 147-148). GPA suggests that if EPA has already established this emission estimate, they should simply add it to the rolled-up GHG inventory for the natural gas industry rather than requiring operators to expend significant resources re-creating the exact same number.

GPA recommends that, consistent with treatment of transmission pipelines, gathering pipelines and flow lines be excluded from fugitive reporting due to the disperse nature of the emissions and the impracticality of the requirements of proposed Subpart W.

Response: Today's final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1031-12

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

Anadarko recommends that, consistent with treatment of transmission pipelines, gathering pipelines and flow lines be excluded from fugitive reporting due to the dispersed nature of the emissions and the impracticality of the requirements of proposed Subpart W.

Response: Today's final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1016-4

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

However, AGA is alarmed that in this 2010 version of Subpart W, EPA is now proposing to require natural gas utilities to report GHG fugitive, vented and combustion emissions from their natural gas distribution systems.

For the reasons provided below, AGA urges EPA to delete natural gas distribution from the list of industry segments subject to Subpart W. However, if EPA retains distribution systems in the final rule, then AGA urges EPA (1) to postpone applicability or otherwise phase-in Subpart W, and (2) to revise and clarify several provisions to facilitate implementation and compliance.

Response: EPA disagrees with the proposal to exclude or delay requirements applicable to distribution systems under today’s final rule. EPA disagrees with a phase-in approach, however, has provided best available monitoring methods options for the first year under certain conditions. Please see response to EPA-HQ-OAR-2009-0923-1151-64 for further details. In today’s final rule EPA has clarified and explained in more detail reporting requirements for natural gas distribution which some comments interpreted incorrectly. EPA has also clarified the rule language to correct the perception that led commenters to believe the reporting burden would be much higher for LDC’s. Please see Section II.E and III.B.2 of the preamble for a discussion changes/clarifications to the rule requirements and the economic impacts of today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1015-4

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

General Comments – Certification by a “Designated Representative”

As proposed, this rule will require owners of a site to report GHG emissions resulting from rental and portable equipment located at a well head. Often, the owner of the site does not have emission information, or relies on information provided by a rental company (i.e., Compressor Systems, Inc.) that may or may not be accurate or acceptable by EPA standards. 98.4(e) requires that emissions reports be certified by a “Designated Representative.” Companies Designated Representative must therefore ultimately certify emissions for units they do not control, and there is no guarantee those emissions are auditable, verifiable, etc. PAW requests that the EPA clarify that emissions from equipment that is on-site, but not under common ownership, does not need to be reported by the site owner.

Response: The designated representative (DR) is the entity that is responsible for submitting the emissions data pursuant to today’s final rule. Please see the response to EPA-HQ-OAR-2009-0923-1024-16 and the response to EPA-HQ-OAR-2009-0923-1031-21.

Comment Number: EPA-HQ-OAR-2009-0923-1040-19

Organization: American Exploration & Production Council

Commenter: V. Bruce Thompson

Comment Excerpt Text:

98.231(b)

This part states: ~For applying the threshold defined in 98.2(a)(2), you must include combustion

emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters." As discussed in the comment for 98.230(a)(2), in cases where the well site operator contacts drilling rigs from a third-party company, it is not feasible for the well site operator to collect the required information or control the source's usage.

Response: EPA does not agree with the commenter. For further details, please see response to EPA-HQ-OAR-2009-0923-1170-7 and the response to EPA-HQ-OAR-2009-0923-1031-21.

Comment Number: EPA-HQ-OAR-2009-0923-1016-39

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

LNG Facilities Do Not Contribute Significant Levels of Fugitive GHG Emissions and Should be Excluded from the Proposed Rule (Including Threshold Determinations)

1. LNG Storage and Import Facility Emissions Are Minimal and If Quantified Would Not Materially Increase the Facility's Total Emissions

There is no policy need to require LNG storage or LNG import facilities to report fugitive GHG emissions, because the levels of fugitive emissions from these facilities are so low. EPA's term "LNG Storage Facility" effectively includes two types of facilities: (1) LNG Satellite Facilities, and (2) LNG Storage and Liquefaction Facilities. These LNG storage facilities are "peak shaving" facilities that by design are installed to offset high peak natural gas demand during cold winter months. LNG storage facilities typically operate (i.e. vaporize stored LNG) about 10-15 times annually for periods of a few hours each during peak gas demand (winter). The limited vaporization operations minimize the risk of a leak of the product.

Based on our member calculations of varying sizes and types of LNG facilities (LNG satellite, LNG storage & liquefaction, and LNG import), using both absolutely conservative (100% of potential emission sources leaking, a practical impossibility given the LNG regulations) and more realistic although still quite conservative (2% leaking) estimates, and the emission factors from the proposed rule, our members have determined that none of their LNG storage or import facilities would be expected to emit enough fugitive GHGs to exceed even 500 tpy (and even the largest facility could not physically emit more fugitives than 10,000 tpy with 100% of sources leaking), and therefore the fugitive detection requirement would have no material effect on the facility's total emissions in relation to its reaching the 25,000 tpy CO₂e regulatory threshold. Our members very conservatively estimate that LNG satellite facilities could emit in a range of 5-250 tons per year CO₂e in fugitive emissions (with 2% - 100% of potential emission sources leaking), and larger LNG storage and liquefaction facilities could emit around 60-3,000 tpy (2% - 100%). The combined fugitive, vented, and combustion emissions from both of these types of LNG storage facilities would be well below the 25,000 tpy threshold.

As a practical matter, LNG storage facilities should be exempt from reporting because they do

not meet the threshold under §98.2(a)(2). Yet, under the 2010 Proposal, all LNG operators, both storage and import, would still be forced to engage -- at least once if not periodically-- in the same level of effort to develop component counts, conduct duplicative Subpart W leak surveys using optical gas scanning equipment, and apply dated emission factors, in order to demonstrate that GHG emissions from their facilities do not exceed the regulatory threshold. The minimal fugitive emissions of these LNG facilities do not warrant the cost per ton of conducting threshold determinations under Subpart W threshold. Additionally, the requirement to conduct fugitives detection should be withdrawn for both LNG storage & liquefaction facilities and LNG import facilities, on the basis of the robust conditions required at all LNG facilities and the inevitably minimal tpy CO₂e that could be detected – a level which could not justify the cost per ton of undergoing the proposed optical gas scanning detection survey.

All LNG import facilities are expected to exceed the threshold for combustion emissions due to continuous vaporization, but they will already be required to report those combustion emissions under Subpart C. Fugitive emissions from import facilities would theoretically range from 160-8,000 tpy CO₂e in fugitive emissions (although it must be recalled that the low end of this range is itself very conservative).

2. Exclude LNG Storage or Allow a Simplified Threshold Determination:

Accordingly, AGA urges EPA to clearly exclude LNG storage and LNG import facilities from Subpart W. In the alternative, we urge EPA at least to provide a simple method for making a threshold determination that does not require component counts and costly leak surveys.

3. Small LNG Throughput and Tight Equipment Yields Low Emissions:

A large percentage of LNG supply is delivered to the national natural gas piping system from 11 existing LNG import terminals. In contrast, a much small percentage of LNG is supplied from LNG storage facilities.

While the sizes of LDCs vary across the country, one medium sized LDC which owns and operates an LNG peak shaving facility had a total annual distribution system throughput of 100,000,000 decatherms (Dths) in 2009. Of this volume, approximately 400,000 Dths of natural gas reentered the system by vaporization and boil-off. This re-gasified LNG send-out equates to less than 0.4% of the LDC's total system throughput, the balance being contracted pipeline supply. It is general LNG industry knowledge regarding peak shaver utilization that typically less than half of the LNG storage capacity is sent out annually during the winter vaporization season, unless extremely cold winter weather conditions exist for an extended period of time (referred to in the gas industry as a design day series).

LDCs contribute to only 6-8% of the total fugitive emissions from the oil and natural gas sector and less than 1% of total U.S. emissions. It is reasonable to assume that, using the LNG facility in the above example, the processing and control by LNG facilities of product volumes that are no more than 0.4% of the volumes that contribute 6-8% of the fugitive emissions in the sector is unlikely to lead to emissions levels that differ greatly from the proportion of LNG in overall natural gas send-out. An EPA Climate Change Division presentation titled "Petroleum and

Natural Gas Fugitive and Vented GHG Emissions Reporting, Proposed Rule” (see Exhibit C, Fig. 1) clearly illustrates the minimal percentage of GHG fugitive emissions that EPA estimates that LNG storage and import terminals contribute minimal amounts to the overall fugitive emissions within the oil and gas processing industry sectors; yet these facilities are proposed to be included in the proposed rule. This makes no sense to us, and we respectfully request that EPA delete LNG storage from the list of industry segments covered by Subpart W.

Response: EPA disagrees with the commenter, and is including LNG storage and LNG import and export equipment. The commenter claims that the emissions from LNG facilities are small, but has provided no details of its analysis to support the claim. Furthermore, EPA has limited data concerning GHG emissions for this sector and cannot validate without actual data reporting the magnitude of emissions from LNG facilities that it has estimated in the threshold analysis, which shows that 33 LNG storage terminals and all import terminal are above the reporting threshold and will have to report. in today’s final rule. Please see the responses to EPA-HQ-OAR-2009-0923-1025-1 and EPA-HQ-OAR-2009-0923-1299-12 for further details. EPA recognizes that several LNG facilities are small and indeed below the reporting threshold. Hence, EPA plans to provide a screening tool that will help LNG facilities determine whether or not they have to report to Subpart W. This will mitigate the concern of non-reporters having to conduct monitoring to determine whether or not to report. Please see Section II.F of the preamble to today’s final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1016-46

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Emergency Flares Should Be Excluded from Subpart W

The flares installed in LNG Storage and import facilities should be exempt from Subpart W reporting as this equipment is used only for rare emergency purposes. Only a few LNG storage facilities are equipped with flares. The purpose of these flares is to serve as a safety system backup component – typically in the event of a total power loss at the facility or an equipment failure which disables the boil-off compression units. These boil-off compression units control storage tank pressure by removing the excessive boil-off gases from the storage tanks, compressing the gas, for use in the liquefaction pretreatment system, or injecting it into the LDC’s distribution system or into a transmission system pipeline. LNG facilities are typically designed and installed with multiple levels of redundancy to ensure availability, including redundant power supplies and boil-off compression units, further reducing the potential for unavailability of boil-off compression and the need to flare the boil-off gas. As it has with other emergency equipment such as emergency generators, EPA should exempt emergency flares at LNG facilities from emission reporting.

Response: EPA agrees with the commenter. Today’s rule has been clarified that only flare emissions in onshore production and natural gas processing must be reported.

Comment Number: EPA-HQ-OAR-2009-0923-1016-29

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

EPA Should Revise the Reporting Requirements for Underground Storage to Make Them More Workable and Reasonable

A. Underground Storage in “Odorized Service” Should be Exempt from Subpart W Reporting

Some of our members operate underground storage in odorized service – meaning that a pungent mercaptan odorant has been added to the otherwise odorless natural gas. As we noted with respect to distribution facilities, the presence of this odorant provides a ready method for detecting methane leaks. Odorized fugitive gas at these underground storage facilities – particularly at the related compressor stations – would be much more readily discovered through routine leak detection methods already employed by regulated LDCs under existing federal and state leak survey requirements discussed earlier in these comments. As a result, natural gas leaks are found and repaired promptly. In addition, as in the case of transmission pipelines and LNG facilities, underground storage facilities operate at high pressures, which make any leaks more readily apparent and quickly fixed. Therefore, for the same reasons that EPA excluded transmission pipelines from Subpart W, the agency should also exclude underground storage facilities in odorized service.

In fact, even where natural gas is not odorized, when it is injected into a depleted oil or gas production reservoir, the natural gas will pick up natural odorants from the reservoir. The vast majority of fields used for storage service are depleted oil and gas reservoirs where all of the native gases and oils have not been removed. Thus when the gas is injected, it will pick up some of this material giving it a natural odor. In addition, there are many fields, including aquifers, where hydrogen sulfide gas is present. At these facilities, the odor of the natural gas alert operators to any significant leaks.

In addition, storage facilities operate at high pressures. Storage operators cannot let leaks continue uninterrupted due to noise as well as the odor. When a leak is detected it is isolated and fixed quickly. Thus, for the same reasons that EPA excluded transmission pipelines from Subpart W, the agency should also exclude underground storage facilities in depleted oil and gas reservoirs.

Response: EPA disagrees that it should exclude underground storage facilities where the gas is odorized. While odorized natural gas leaks may be detected by smell, there are several emission sources for which reporters may not be able to smell emissions. For example, storage wellheads may be remote and visited infrequently, thus, reporters will not immediately detect leaks. Emissions from compressor seals and valves may be manifolded into a rooftop vent, which will be inaccessible to scent detection. Pneumatic devices are designed to vent natural gas, an important emissions source that EPA must collect data for in order to inform future policy. The information available to the EPA through its National GHG Inventory does not indicate

emissions from underground storage to be insignificant. Hence, EPA contends that if the leaks from underground storage facilities are indeed small then they will reflect as such in the monitoring of equipment. Furthermore, EPA provides adjustments for leaking sources that are fixed in the reporting of equipment leaks that will avoid overestimating of emissions from the segment.

Comment Number: EPA-HQ-OAR-2009-0923-1305-15

Organization: BP America, Inc.

Commenter: Karen St. John

Comment Excerpt Text:

The rule should state that any source that recovers emissions, such as by routing an off-gas stream back to the process or re-injecting it into the reservoir, is excluded from reporting. This includes equipment such as dehydrators, tanks, and acid gas units that recover gas streams.

Response: EPA does not agree with the commenter. Recovery systems do not always function at 100 percent efficiency. Hence, EPA requires reporting of emissions from tanks and dehydrators even with any form of recovery with an adjustment to the emissions for the portion of actual recovery. As regards re-injection from AGR units, please see the response to EPA-HQ-OAR-2009-0923-0582-31.

Comment Number: EPA-HQ-OAR-2009-0923-3547-2

Organization:

Commenter: M. Harrison

Comment Excerpt Text:

Basin level reporting represents an unnecessary reporting burden because the facilities are then so large that there are no exclusions. EPA should define a facility at a more reasonable and smaller aggregation level.

Response: EPA does not agree with the commenter. Only about four percent of the total of over 22,500 onshore production facilities in the country will report to today's final rule, which is contrary to the commenter's claim. Please see Section 4 and 5 of the TSD to today's final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-0582-6

Organization: Western Climate Initiative (WCI)

Commenter: Michael Gibbs

Comment Excerpt Text:

For the purposes of state level reporting, the WCI requests that the EPA require onshore and offshore petroleum and natural gas production facilities to report emissions by the combination of state and hydrocarbon basin. As this information is implicit in data that will be collected by

facilities to support Subpart W reporting, there is little or no burden in reporting at this level and overall system burden is reduced as States will not need to implement duplicate reporting programs.

Response: EPA does not agree with the commenter. Requiring an additional layer of reporting will increase the burden on reporters since operations often cross state boundaries. Hence EPA does not ask for the reporting of emissions by State and basin.

Comment Number: EPA-HQ-OAR-2009-0923-1004-12

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

EPA Should Replace Basin-Level Reporting With Optional Aggregation of Wellheads Into Reporter-Designated Production Fields

EPA’s proposal to classify all wells within a basin as a single “onshore petroleum and natural gas production facility” runs contrary to past practice and does not result in coherent or useful groupings of sources. As EPA is no doubt aware, basins are massive geographic designations that are highly heterogeneous with respect to geology, fluid composition, and equipment and operational practices. A single basin usually contains wellheads with a wide variety of production characteristics that influence GHG emissions. Thus, emissions data reported at the level of a basin is unlikely to be helpful in understanding GHG emission trends in the onshore petroleum and natural gas production sector, nor is it likely to provide a useful guide to policymaking.

In addition, Clean Air Act regulations have always treated individual equipment sites as the appropriate unit of compliance for purposes of New Source Performance Standards (NSPS), National Emissions Standards for Hazardous Air Pollutants (NESHAPS), and New Source Review (NSR).¹⁸ Section 112 of the Clean Air Act also expressly prohibits the aggregation of multiple oil and gas wells for purposes of applying NESHAPS. Contrary to discussion in the TSD indicating that the definition of a “facility” is difficult to apply to onshore petroleum and natural gas production, these Clean Air Act regulations are well-understood and have proven workable over a course of many years. The basin-level approach departs dramatically from this established practice and could lead to confusion, inconsistency, and unintentional misreporting in our sector.

If EPA seeks to reduce the number of emission reports submitted for the petroleum and natural gas production sector, NGSAs support the alternative to basin-level reporting proposed by the American Petroleum Institute. Under this proposal, owners of wellheads would have the option of aggregating wellheads into coherent producing fields based on common geologic and operational characteristics. This approach would achieve the goal of rationalizing the number of reports submitted to EPA without disturbing the conventional definition of “facilities” used in the Clean Air Act. In addition, this approach would yield more useful data that could eventually lead to a better understanding of the influence of field characteristics on GHG emission profiles.

Response: EPA does not agree that a basin level definition does not provide useful information. Please see response to EMAIL-0001-4 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923) for further details.

EPA does not agree with the commenter that CAA prohibits the use of a basin level definition. For details EPA’s authority collect information using the basin definition, please see rulemaking docket EPA-HQ-OAR-2009-0923 under “Legal Topics - Topic 1: GHG Reporting under Subpart W and the Consolidated Appropriations Act” and responses to EPA-HQ-OAR-2009-0923-1044-1, EMAIL-0001-1 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923), and EPA-HQ-OAR-2009-0923-1005-2. Also, EPA has clarified the boundaries of onshore production as it relates to other segments. For further details, please see Section 98.2 of the rule.

EPA does not agree with the comment on aggregation of fields within a basin level reporting. For further details, please see the response to EPA-HQ-OAR-2009-0923-1305-46.

Comment Number: EPA-HQ-OAR-2009-0923-1004-3

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

A key problem NGSa has identified is that the proposed Subpart W regards a reporting company’s aggregate basin-level production as the reporting “facility.” The discussion in the Technical Support Document (TSD) accompanying the proposed rule suggests that EPA views basin-level reporting as a measure that will “substantially increase reporting burden” but substantially reduce the complexity of reporting requirements.

NGSA believes this reasoning is mistaken. Basin-level aggregation will not streamline or reduce the complexity of reporting for our sector, even though it may reduce the number of reports submitted to EPA relative to a field-level or wellhead-level approach. The TSD indicates that EPA views basin-level reporting as a simplifying approach that will only cover 4 percent of “facilities” (meaning basins) nationwide. However, under the basin-level approach, entities that own natural gas production facilities will still have to measure GHG emissions at every individual wellhead within a basin to determine whether the aggregate 25,000 tons CO₂e threshold for the basin is met, and to prepare emission reports for basins exceeding the threshold.

Response: EPA does not agree with the commenter that a basin level facility definition does not reduce complexity. A basin level definition is the least complex of all facility definition options given the well defined facility definition and minimal impact on small and medium businesses. Please see the responses to EPA-HQ-OAR-2009-0923-1305-46 and EPA-HQ-OAR-2009-0923-1005-2 for further details. A field level or wellhead level facility definition with a reduced threshold will result in a larger number of reporters than with a basin level approach. EPA is planning to provide screening tools for facilities to determine whether or not they have to report. This will mitigate any concerns of non-reporters having to perform monitoring methods as

required by the rule to determine whether or not they have to report.

Comment Number: EPA-HQ-OAR-2009-0923-1005-3

Organization: Independent Petroleum Association of America

Commenter: Lee Fuller

Comment Excerpt Text:

EPA proposes its basin approach and solicits comment on the option of using a similar approach involving “field-level reporting”. In doing so, the Agency discounts the obvious choice – the well pad. Clearly, the well pad looks like a facility under the definition in the CAA and is the typical permitting unit under CAA regulations. EPA considered a well pad approach and “EPA analyzed the average emissions associated with each of the four well pad facility cases and determined that average emissions at these operations were low (from about 370 metric tons of CO₂e per year to slightly less than 5,000 metric tons of CO₂e per year).” Recognizing that individual sources were small, EPA chose to create its novel basin approach.

Response: EPA disagrees with the commenter. Using a well pad definition would have necessitated the use of a lower threshold or no threshold. This in turn would have impacted small and medium operators to a much larger extent than the basin level definition will in today’s final rule. Hence, EPA has retained the basin level definition in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1005-6

Organization: Independent Petroleum Association of America

Commenter: Lee Fuller

Comment Excerpt Text:

EPA largely seems to recognize this reality when it states:

...this segment is not proposed for inclusion primarily due to the unique difficulty in defining a “facility” in this sector and correspondingly determining who would be responsible for reporting.

EPA has requested comments on how to define a facility for onshore petroleum and natural gas production and whether to require reporting on a basin level. We believe that the appropriate facility definition tracks the nature of the operation – essentially a well pad which may contain one or several wells and the attendant separation and storage facilities. As we discussed above, these operations will fall well below the reporting threshold. To approach the reporting on a basin level would result in compelling this industry to use a reporting threshold far below the 25,000 tons/year threshold required for other industries. In essence, all production operations would have to determine emissions levels by whatever estimation or monitoring requirements would apply. This would impose dramatically different costs. To put all of this in some perspective, EPA’s INVENTORY OF U.S. GREENHOUSE GAS EMISSIONS AND SINKS: 1990-2007 (Released on April 15, 2009) would suggest that the GHG emissions from natural gas

systems and petroleum systems account for roughly 2.3 percent of U.S. GHG emissions. EPA suggests that about 27 percent of these emissions come from onshore petroleum and natural gas production operations – or roughly 0.6 percent of U.S. GHG emissions.

There is no compelling rationale to justify imposing on this segment of American industry a far costlier reporting requirement, capturing hundreds of thousands of wells many owned by small businesses, solely for the purpose of minimally improving the U.S. GHG emission inventory.

This circumstance has not changed appreciably. EPA argues that it has underestimated the amount of GHG emissions from onshore petroleum and natural gas production systems. The 2008 U.S. Inventory of Greenhouse Gases reported 131 MMTCO₂e from petroleum and natural gas systems. EPA believes the emissions are 351 MMTCO₂e. To put this in the same perspective as our 2009 comments, these systems would account for slightly more than 6 percent of U.S. GHG emissions and the onshore petroleum and natural gas production systems would be approximately 3.9 percent. EPA must recognize the burden it will impose on the small businesses that operate the majority of these systems.

Response: EPA disagrees with the commenter on the use of well pad facility definition. See response to EPA-HQ-OAR-2009-0923-1005-3 for further details. EPA has also determined that only a small number marginal operators in the country will be impacted by the rule. Please see response to EPA-HQ-OAR-2009-0923-1005-7 and Section 5.2 of the EIA to today’s final rule for further details. Finally, EPA informs that the petroleum and natural gas industry is the second largest GHG emitter below power plants, and onshore production contributes to over 50 percent of the industries emissions. Hence, EPA deems it necessary to require reporting of emissions from onshore production.

Comment Number: EPA-HQ-OAR-2009-0923-1015-5

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

General Comments – Aggregation by Basin

The EPA has proposed aggregating sources for the purposes of determining applicability. In the Technical Support Document on page 19, the EPA states, “Reporting at the basin level will substantially increase reporting burden. However, complexity of reporting requirements will substantially be reduced if companies report at the basin level.” PAW concedes that the number of reports filed is reduced as a result of basin-wide aggregation, but complexity of tracking equipment changes and emissions reporting requirements becomes extraordinarily complex to track as it is not industry practice to track equipment by basin. That information is tracked by asset line, which does not coincide with basin-wide operations.

Response: EPA disagrees with the commenter. Please see response to EPA-HQ-OAR-2009-0923-1060-4 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1015-7

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

Lastly, producing basins cross state lines and some states have state-specific reporting requirements that do not align with the EPA's proposed reporting rule. Aggregating sources by basin causes operators to comply with competing methodologies and thresholds in order to comply with state specific and federal reporting. PAW requests the EPA work with states that have implemented state-specific GHG reporting requirements to harmonize these GHG reporting requirements.

Response: EPA has carefully reviewed this comment and disagrees that the onshore producing reporting requirements should be harmonized with each state program. States do not necessarily have a harmonized program amongst themselves. This means no matter what options EPA were to choose there will always be some States that are not in harmony. Furthermore, EPA has chosen several monitoring methods that are not required by the State programs, such as sampling and direct measurement of well venting sources, but are required by EPA because they characterize emissions from sources with reasonable accuracy necessary to inform policy. Finally, trying to harmonize with State programs without standardization of monitoring methods would impose a patchwork of reporting obligations on all producers, whether they were presently reporting under a state program or not and would be difficult to define or administer. Today's final rule does require reporting the largest emission sources in onshore production by field within a basin. While this uniform reporting requirement across the full spectrum of petroleum and gas producing basins may not exactly conform to each States' reporting requirements, most of the data collected at a field level will conform to state boundaries, and can be used in conjunction with state reporting where suitable to minimize duplication of data collection efforts.

Comment Number: EPA-HQ-OAR-2009-0923-1018-1

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

General Comments on Sub-Part W In general, CAPP does not support the aggregation of emissions at the field or basin level. This practice increases the reporting burden with little improvement of reported emissions. The facility threshold for reporting should be set low enough to capture all the emissions of interest to the regulating entity. Additionally, special circumstances (for example unique definition of facility) should not be created for one sector which either increases or decreases the level of reporting required; carbon should be treated equally across all sectors.

Response: EPA has chosen the basin level definition with due consideration of burden to report and necessary coverage required to inform policy. Setting low thresholds would impact a large number of small and medium sized businesses and would lead to a larger burden than a basin level definition.

Comment Number: EPA-HQ-OAR-2009-0923-1018-10

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Preamble page 38, "EPA evaluated and is taking comment on one alternative option for reporting from onshore petroleum and natural gas production; field level. Field level reporting would require aggregation of emissions from all covered equipment at onshore petroleum and natural gas production facilities at the field level, as opposed to the basin level as described above."

- While neither basin nor field level reporting is preferred, of the two, CAPP would recommend field level reporting as this is generally closer to the way oil and gas companies manage their business. However, if EPA chooses to go to field level reporting, the threshold should remain at 25,000 metric tons CO₂e per field. ·

- As stated previously, CAPP strongly recommends that a de minimus approach be taken if proceeding with field or basin level reporting for the upstream oil and gas sector.

Response: EPA disagrees with the comment on the use of field level facility definition with a 25,000 metric tons CO₂e threshold; a field level definition would warrant a lower reporting threshold. This would result in lower coverage and lower cost-effectiveness. Please see Section 5.1 of the EIA to today's final rule. EPA does not agree with the use of a de minimus. Please see response to EPA-HQ-OAR-2009-0923-1018-2 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1064-2

Organization: Vorys, Stater Seymour and Pease LLP

Commenter: Gregory D. Russell

Comment Excerpt Text:

The Association further believes that imposing emissions monitoring and reporting obligations on operators at the Basin level would be unreasonable. Ohio producers, like producers elsewhere in the country, have experienced tremendous volatility in the crude oil and natural gas markets over the last several years, combined with substantial increases in the costs they pay to explore, develop and operate producing reservoirs. But Ohio producers are price takers, meaning a) that they must accept the prevailing market price for the crude oil and natural gas that they produce and sell; and b) they must also accept the prevailing market price for the exploration, development and drilling services that they need and for which they often compete on a regional and national basis. As a consequence, Ohio producers cannot offset increased expenses by raising the amount they charge for their production. And producers' expenses have increased – from the direct costs associated with their operations, to the fees that jurisdictional authorities charge to offset decreases in agency budgets, to the taxes imposed to make up declines in governmental revenues. Even a quick search across the country shows, for example, how

regulating agencies and tax authorities are looking to America's energy producers for a quick fix to their budgetary shortfalls. The circumstances faced by Ohio producers are no different.

Response: EPA analysis has determined that the impact on Ohio producers will be insignificant. Please see response to EPA-HQ-OAR-2009-0923-1064-3 for further details. EPA has also conducted a Small Business Analysis to determine the impact of the rule on small businesses and has determined that the impact is going to be insignificant. Please see Section 5 of the Economics Impact Assessment document to today's final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1083-1

Organization:

Commenter: A. Bhaskar

Comment Excerpt Text:

I strongly approve EPAs April 2010 proposal that would require oil and gas producing equipment in the same basin to report emissions as one facility. Oil and gas emissions must be aggregated and reported as one facility.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-1151-133

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

EPA Should Limit the Scope of Data Collection

API cautions EPA against trying to use the proposed reporting rules as a way to anticipate or lay the groundwork for future climate change legislation. EPA states that the GHG emissions data is relevant in carrying out "a wide variety of CAA provisions," yet the Agency does not specify which provisions or how the data will be utilized. Until EPA clearly identifies the policy options it will pursue with respect to greenhouse gas emissions, EPA should limit the proposed rule to require the collection of reasonably accurate and complete data using readily available sources or estimation methods. It is inappropriate at this time for EPA to require the level of exquisite precision that would be necessary in the context of a compliance-oriented regulatory program. As presently drafted, the proposed rule runs the risk of collecting data that EPA will ultimately not need at considerable costs to affected entities – or failing to collect data that EPA would need to carry out particular programs. For example, EPA has recently issued a series of actions that the Agency asserts will make stationary sources of GHG emissions subject to Prevention of Significant Deterioration ("PSD") and Title V permitting for GHG emissions, beginning on January 2, 2011. Under the recently finalized PSD and Title V Tailoring Rule (Pre-Publication version, released May 13, 2010), EPA has set the thresholds for PSD permitting for new sources and major modifications of existing sources, at 100,000 and 75,000 tpy CO_{2e}, respectively. In addition, the Agency asserted that even under future rules, no sources of GHG emissions below

50,000 tpy CO₂e will be subject to CAA permitting, at least until April 30, 2016, and possibly indefinitely. Thus, if GHGs are indeed regulated under PSD, it is unclear why entities with emissions below the 50,000 tpy CO₂e or even the 100,000 tpy CO₂e thresholds should be required to report emissions.

iv. Proposed Subpart W Imposes Unreasonable Reporting Obligations and Unreasonably Defines a Facility at the Geologic Basin Level

The proposed reporting requirements exceed EPA's Section 114 authority to "...undertake monitoring...[and]...sample emissions...as the Administrator may reasonably require," 42 U.S.C. Section 7414(a)(1) (emphasis added), because they would unreasonably require an unprecedented and unworkable number of man-hours to meet compliance requirements, in addition to the installation and maintenance of extensive and expensive GHG monitoring instrumentation. This is particularly true in the context of onshore petroleum and natural gas production facilities, for which EPA has proposed to define a facility at the geologic basin level. As a result of EPA's unreasonable decision to define a facility at a geologic basin level, the rule would impose burdensome, costly, and extremely complex monitoring and reporting obligations on 21,744 entities (API estimate) operating millions of pieces of equipment scattered over thousands and thousands of miles. EPA's choice to define a facility as such results in a program whose costs would be nearly prohibitive, and clearly unreasonable. Because the proposed rule does not meet the reasonableness and necessity limitations placed on the EPA Administrator's authority to collect information, it exceeds the EPA's statutory authority. (See Section A above, for API's suggested revisions to the facility definition for onshore petroleum and natural gas production sources.)

API believes that EPA's reporting efforts – and the resources of regulated entities – would be more productively targeted if EPA were to identify with greater specificity the policies or programs that it intends to develop using the data gathered under proposed Subpart W and limit reporting requirements to support those policies or programs.

Response: EPA does not agree with the commenter on the monitoring and reporting requirements of the rule. EPA cannot determine policy without collecting relevant data. If collecting relevant data could in some cases avoid regulation because emissions reported are insignificant, then EPA considers that data collection effort worthwhile and does not see any merit in commenter's claim that there is a risk of collecting the data required per the rule. EPA has chosen the most cost-effective but adequate monitoring methods such that the quality of data is sufficient to inform policy. Please see Section II.E and II.F of the preamble to today's final rule on EPA required monitoring methods. Regarding information being gathered under the reporting rule may be used for a variety of reasons under the CAA. Thus, the PSD/title V thresholds through 2016 are not dispositive of the issue. Moreover, the information EPA gathers under the reporting rule from sources below those thresholds may in fact prove useful for the subsequent review of the thresholds EPA plans to undertake. Please see response to EPA-HQ-OAR-2009-0923-1044-1, EPA-HQ-OAR-2009-0923-1044-6 and Volume 9 Response to Comments, Legal Issues, on The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) for further details.

EPA disagrees with the commenter on its authority to collect information at a basin level facility definition under the CAA. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under “Legal Topics - Topic 1: GHG Reporting under Subpart W and the Consolidated Appropriations Act” and response to EPA-HQ-OAR-2009-0923-1044-1. EPA does not agree with the commenter on burden to report under the rule. The commenter has grossly overestimated the burden to report. See volume 10.3 for further details on cost concerns from commenters and corresponding EPA responses.

Comment Number: EPA-HQ-OAR-2009-0923-1151-63

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Section 98.236 : Data Reporting Requirements. The following paragraphs in this section of the proposed rule request data reporting by basin and field. If reporting is done at a basin level for comparison to the applicability threshold, the data reporting requirements should be consistent with the basin-wide rollup of emissions and the data should not have to be reported at a field level due to the additional burden that would be imposed in order to delineate the data by field and the redundancy in reporting the field level data. API requests that the term “field” be deleted from the following paragraphs in this section: Section 98.236 (c)(6), (7), (8), (12), (13), (15), (16), (21), and (22). By default then, reporting will be at the Basin entity level, consistent with EPA’s definition of “facility” as defined in Section 98.230(a)(2).

Response: EPA requires well unloading, well completion, and well workover emissions to be estimated at a field level and hence the reporting is required at the field level within a basin. Since the data will be collected at a field level, EPA does not consider it a problem to report at a field level. This covers the data reporting requirements in Sections 98.236 (c)(6), (7), (8), (13), (15), and (16) of the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002). In today’s final rule EPA does not require well testing and hydrocarbon liquids to be reported at a field level. This covers data reporting requirement Sections 98.236(12) and (21) of the April 2010 proposed rule. Finally, EPA does not require the reporting of produced water emissions in today’s final rule. EPA would like to note that the data reporting index in today’s final rule does not match up with the index in the supplementary proposed rule for all emissions sources.

Comment Number: EPA-HQ-OAR-2009-0923-1151-66

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Preamble p. 38) EPA seeks comments on the availability of other appropriate standard basin level definitions that could be applied for the purposes of this rule and their merits over the AAPG definition.

W4. (Preamble pp. 38, 55) EPA evaluated and is taking comment on one alternative option for reporting from onshore petroleum and natural gas production; field level.

API does not believe the regulatory named field level (as defined in the referenced EIA field list) is a useful concept for either threshold or emission estimation purposes. With over 44,000 named fields in the EIA list, the widely varying number of wells in each named field (from zero to tens of thousands), and the dynamic nature of the list, it would introduce a significant amount of uncertainty and additional burden. Of particular concern is the changeable nature of the list. As State Oil and Gas agencies modify their field lists, the EIA subsequently modifies their list usually with a delay of about one year. For example, Wyoming is actively reviewing their named fields with a goal of combining like fields (similar to the API proposal below) and reducing the number of fields listed. This flux in field names and boundaries would pose a significant challenge to an owner/operator in determining what wells and facilities to group for threshold and other purposes under the rule.

Response: EPA does not agree with the comment that field level concept is not useful for estimation of emissions. Please see EPA-HQ-OAR-2009-0923-1305-37 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1151-67

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Preamble p. 39) EPA seeks comments on our decision to propose the basin level approach, and whether there would be advantages to requiring reporting at the field level instead.

As described in Section I.A above, API proposes an alternative method of grouping fields within a basin, based on common production characteristics. These Sub-basin entity groupings would be established and documented by the reporting operator in the monitoring plan. Emissions from the groupings would be summed at the Basin entity level for comparison against the 25,000 tonne CO₂e reporting threshold.

Response: EPA does not agree with the comment. For further details, please see the response to EPA-HQ-OAR-2009-0923-1305-46.

Comment Number: EPA-HQ-OAR-2009-0923-1167-43

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

The scope of Subpart W reporting will be basin-wide; thus, the authorization of responsibilities and requirements at Subpart A at Section 98.4 must be modified to be reasonably and appropriately applied to Subpart W onshore petroleum and natural gas production facilities.

Given that under Subpart W reporting is to occur on a basin-wide scope, the authorization of responsibilities and requirements at Subpart A at Section 98.4 must be modified to be reasonably and appropriately applied to Subpart W facilities. Overlooking this need to reconcile Subpart A and Subpart W will cause significant and unjustified burden on onshore petroleum and natural gas production facilities subject to Subpart W.

Response: The commenter does not provide sufficient details on how 98.4 must be revised as it applies to Subpart W. EPA has determined the requirements to be relevant and that the requirements under Subpart A appropriate in relation to W. The designated representative (DR) is the entity that is responsible for submitting the emissions data pursuant to today's final rule. Please see the response to EPA-HQ-OAR-2009-0923-1024-16.

Comment Number: EPA-HQ-OAR-2009-0923-1174-6

Organization: Devon Energy Corporation

Commenter: Richard Luedecke

Comment Excerpt Text:

If EPA decides to go forward with the proposed “onshore petroleum and natural gas production facility” definition, EPA must take steps to balance the data collection and reporting burden against the amount of GHG emissions quantified. EPA should:

* Allow owners/operators to group together similar operations and sources at the sub-basin level based on common production characteristics (e.g., similar well depths and well-bore configurations, same or groups of similar producing reservoirs, similar fluid compositions, similar pressure and temperature ranges, etc.) and allow the operator to use emission factors or estimation methods based on the emission variables that are common to the site grouping. For instance, WY regulators define a “similar site” for hydrocarbon sampling based on same reservoir and production equipment with similar characteristics (± 25 psig) and allow compositional analysis to be determined from a minimum of 5 wells and an updated analysis performed every 3 years. This single composite analysis could therefore be used to estimate hydrocarbon tank emissions from all sites within a grouping rather than an operator having to collect and analyze a hydrocarbon liquid sample from each site. A similar approach could be followed for other emission sources such as dehydration units. This would reduce costs dramatically.

OR

* Allow for exemptions or simplified methods for production sites with de minimis GHG emissions. This could be accomplished by establishing well defined production thresholds so that operations below those levels are either exempted from reporting or could use a simplified method, such as the API Compendium, to estimate emissions.

Response: EPA does not agree with the comment on sub-basin entities. For further details, please see the response to EPA-HQ-OAR-2009-0923-1305-46. EPA does not agree with the use of a de minimus. Please see response to EPA-HQ-OAR-2009-0923-1018-2 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1196-4

Organization: Independent Petroleum Association of New Mexico

Commenter: Karin V. Foster

Comment Excerpt Text:

By requiring reporting at the Basic level, the EPA has effectively proposed aggregating sources for the purposes of determining applicability. However, guidance provided by the EPA itself in §112(n)(4)(A) states: "... in the case of any oil or gas exploration or production well such emissions shall not be aggregated for any purpose..." Finally, in the Technical Support Document on page 19, the EPA states, "Reporting at the basin level will substantially increase reporting burden. However, complexity of reporting requirements will substantially be reduced..." IPANM contends that while the number of reports may be reduced, the complexity of the reporting will pose excessive burdens on smaller producers. Larger producers may track emissions by asset line but it is not industry practice to track by basin. Moreover, producing basins cross state lines and some states have state-specific reporting requirements that do not align with the EPA's proposed reporting rule. Aggregating sources by basin causes operators to comply with competing methodologies and thresholds in order to comply with state specific and federal reporting.

For example, EPA states, "For applying the threshold defined in 98.2(a)(2), you must include combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters." This requirement is unclear. It is important to note that equipment often moves from well site to well site, however, as written in the rule it appears that equipment must be tracked by basin. While it is common to track equipment by asset or business line, crossing basins will make this reporting requirement difficult to comply as it is information not currently tracked in this manner.

Response: Please see response to EPA-HQ-OAR-2009-0923-1005-2 and EPA-HQ-OAR-2009-0923-1044-1 respecting the relationship between the MRR and other CAA programs.

EPA disagrees with the commenter on the impact of the rule on small producers. Please see Section 5.2 of the EIA to today's final rule and response to EPA-HQ-OAR-2009-0923-1005-7 for further details.

EPA does not agree with the commenter on the issue of asset line tracking or alignment with state-specific reporting. Please see responses to EPA-HQ-OAR-2009-0923-1060-4 and EPA-HQ-OAR-2009-0923-1015-7 for further details.

In regards to portable equipment and the 30-days requirement, please see the response to EPA-HQ-OAR-2009-0923-1170-7.

Comment Number: EPA-HQ-OAR-2009-0923-1196-5

Organization: Independent Petroleum Association of New Mexico

Commenter: Karin V. Foster

Comment Excerpt Text:

The requirement that anything with a permit under a company name be pulled into the one facility definition means all operations, even if a simple NOI or discharge permit will be part of the facility reporting requirement. It is this portion of the facilities definition that impermissibly expands the EPA's authority under the Clean Air Act. Further, the requirement is poorly defined, as drafted, any permit triggers review and therefore compliance. If any type of state permit is required then companies who must apply for permits for use of closed loop systems in New Mexico, but not in Texas, will be further penalized by the excessively punitive regulatory regime in NM. §98.234(a) will require standby equipment to be included in the emissions reporting which is overly burdensome: by nature, standby equipment is operated at short intervals, and is often operated in place of other equipment with minimal emissions. §98.236(f) requires operators to report emissions separately for portable equipment such as drilling rigs, dehydrators, compressors, electrical generators, etc. However, this requirement would require installation of fuel meters on equipment that otherwise would be included in the site-wide fuel usage. §98.237(f) requires calibration reports for detection and measurement instruments used. This requirement would mean companies would have to retain records for every single pressure gauge which is a tremendous amount of information that does not impact GHG emissions from a site.

Clearly, the proposed EPA facilities definition has significant problems. The common control prerequisite, the basin reporting requirement and the one permit standard will cause many more petroleum and natural gas facilities to report than originally intended with the 25,000 ton threshold. Indeed, the rule would apply to the smallest operators who often work to maintain marginal wells with de minimus greenhouse emissions. In New Mexico it is estimated that 80% of the oil wells representing 30% of total production in the state are classified by the Energy Information Administration as marginal. Similarly, 68% of the natural gas wells representing 20% of the natural gas production in New Mexico is classified as marginal production by EIA. The EPA needs to consider alternative protocols for reporting rather than forcing aggregation across entire basins. As recommended by the IPAA, a facility should be what it is, a well pad, which is defined in the Clean Air Act, and is the typical permitting unit in the CAA as well as for State regulations. Further, there are emissions estimating tools available that could be used without imposing this new rule. The EPA operates the Natural Gas star program and the API has completed a new version of its Compendium of Greenhouse Gas Emissions Estimation Methodologies for the Oil and Gas Industry. IPAA notes that these tools could be used to create reasonable average emissions projections for production systems to link to production volumes. Use of existing systems maintained by the EPA itself would avoid placing costly reporting burdens on petroleum and natural gas producers.

Response: EPA disagrees with the commenter on its authority to collect information at a basin level. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under "Legal

Topics - Topic 1: GHG Reporting under Subpart W and the Consolidated Appropriations Act” and response to EPA-HQ-OAR-2009-0923-1044-1.

The commenter has misinterpreted the definition of onshore production petroleum and natural gas facility. EPA has revised and clarified the definition as well as the definition of onshore petroleum and natural gas production owner or operator in today’s final rule. It is clear from these definitions that the permit referred to is the drilling or operating permit for the petroleum or natural gas well and does not include other types of permits such as discharge permits or notices of intent

In regards to three modes of compressor operations, EPA requires the use of emissions factors for process emissions estimation from onshore production compressors. Also, for portable equipment EPA has clarified that engineering estimates of fuel consumption is sufficient. Please see Section II.E and II.F of the preamble to today’s final rule for further details.

As regards to calibration reports, the commenter has not clarified which pressure gauges it is referring to. If the commenter is referring to pressure readings for gas releases then EPA has clarified in today’s final rule that the reporters can use typical operating conditions to estimate emissions, as opposed to conducting a temperature and pressure measurement for every single instance of gas release. However, the requirement for calibration of other meters that are directly use to detect and measure emissions are still required to be calibrated.

The commenter makes the claim that many more reporters will have to report with the basin level definition, but does not provide any analysis to substantiate the claim. EPA has conducted a thorough analysis using actual data and has determined that the impact on small businesses will be insignificant. Please see responses to EPA-HQ-OAR-2009-0923-1005-7 and Section 5.2 of the EIA to today’s final rule for further details.

In regards to the use of a well pad facility definition, EPA disagrees with the commenter. Please see response to EPA-HQ-OAR-2009-0923-1005-3 for further details.

EPA disagrees with the commenter on the use of API Compendium or Natural Gas STAR Program to develop facility specific emissions estimates. Please see responses to EMAIL-0002-9 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923) and -HQ-OAR-2009-0923-1004-2 for further details.

EPA is in the process of developing screening tools to help with the applicability determination. Please see Section II.F of the preamble for more information on the screening tools that will be developed.

Comment Number: EPA-HQ-OAR-2009-0923-1198-9

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment Excerpt Text:

EPA's proposal in Subpart W is that emissions from onshore petroleum and natural gas production would be reported at the basin level. This would include all stationary and portable equipment located on all well pads within a single hydrocarbon basin as defined by the American Association of Petroleum Geologists ("AAPG"). According to the AAPG, the entire state of West Virginia is located within a single hydrocarbon basin. Therefore, a facility will include all sources owned and operated by an operating entity. In other words, an owner and operator must aggregate its emissions from each and every stationary and non-stationary piece of equipment in West Virginia to determine whether it must report its GHG emissions to EPA. This will require even the smallest owner and operator to calculate and aggregate GHG emissions to determine whether they must report. This is an extremely burdensome applicability determination for categories of sources that should not be affected by this rule. The de minimis amount of emissions from small sources should not be aggregated together to determine applicability. These sources should be considered separately as they are insignificant. The burden imposed by the proposed applicability determination requirements far outweighs any significance from these de minimis emissions - especially considering that the entire state of West Virginia is a single hydrocarbon basin. Therefore, emissions should not be aggregated at the basin level. The EPA has requested comment on whether emissions should be aggregated at the field level. WVONGA objects to the field level as well. The field level would also encompass an area so large that our members would be aggregating emissions for virtually all, if not all, of their equipment in West Virginia.

Response: EPA plans to provide screening tools to avoid unnecessary burden on non-reporters to determine whether or not they have to report. Please see Section II.F of the preamble to today's final rule for further details.

EPA does not agree with the use of a de minimus. Please see response to EPA-HQ-OAR-2009-0923-1018-2 for further details.

EPA has retained the basin as opposed to field level definition in today's final rule as it is the least burdensome of the options for collecting data from this sector.

Comment Number: EPA-HQ-OAR-2009-0923-1201-3

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

EPA Should Require Basin Level Reporting for Onshore Oil and Gas Production Sources.

EPA has proposed reporting requirements for onshore oil and gas production sources that would be aggregated at the basin level.²² This level of aggregation is estimated to cover approximately 81 percent of emissions from this sector.²³ EPA is also seeking comments, however, on reporting

²² See 75 FR 18615, April 12, 2010.

²³ See 75 FR 18615, April 12, 2010.

at the field level.²⁴ EPA has estimated that field level reporting would result in a “significantly lower coverage in emissions, estimated at 55 percent in comparison to the basin level coverage of 81 percent.”²⁵

Under EPA’s proposed basin level reporting scheme, each operator would be required to aggregate emissions from all operations conducted within a defined basin to determine if it is required to report emissions (i.e., if aggregated emissions exceed the applicable reporting threshold). This aggregation is important for determining threshold applicability. But EPA should consider requiring disaggregation of the actual reported data to the county or field level, as this would result in a dataset that is much more useful.

We would support a field-level reporting scheme in combination with substantially lower reporting thresholds that would ensure at least 80% of facilities are captured in the reporting requirements.

Response: EPA agrees that the basin level facility definition should be retained, and has done so in today’s final rule. EPA has considered the field level with reduced threshold option, but determined that a basin level approach to be less burdensome; please see response to EPA-HQ-OAR-2009-0923-1004-3 for a discussion on why basin level definition is better suited for this rule.

EPA has, where applicable, such as in the case of well venting sources, required the reporting of emissions at a field level within the basin. However, requiring this of every emissions sources will add to the reporting burden and therefore in such cases EPA requires reporting of emissions at a basin level only.

Comment Number: EPA-HQ-OAR-2009-0923-1297-1

Organization: Southern Ute Growth Fund

Commenter: Lynn Woomer

Comment Excerpt Text:

EPA is seeking comment on the proposed rule on its alternative option for reporting from onshore petroleum and natural gas production; field level, as opposed to basin level reporting. The SUGF encourages EPA to consider the "field level" approach (at a reporting threshold of 25,000 mtCO₂e) should EPA decide to pursue aggregating upstream production sites.

Although the SUGF disagrees with either approach, the "field level" approach would seem more practicable, as many natural gas basins are very large and tend to cross multijurisdictional regulatory areas. This would cause confusion as to which jurisdictional area the emissions may be resulting from.

²⁴ See 75 FR 18615, April 12, 2010

²⁵ See 75 FR 18615, April 12, 2010.

Response: EPA disagrees with the commenter. Please see the response to EPA-HQ-OAR-2009-0923-1004-3 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1298-50

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c): This requirement states that an operator must report activity data for each aggregated source type as further specified. Several of these specifications require reporting for each field within the basin [see Section 98.236(c)(6), (7), (8), (12), (13), (15), (16), (21), and (22)]. Additional breakdown of emissions to the field level is not needed and adds an additional layer of reporting that is both time consuming and unwarranted. IPAMS requests that EPA modify these requirements so that all aggregated reporting is done at the same level of the organization.

Response: EPA disagrees with the commenter in regards to data reporting of well venting emissions at a field level. EPA has clarified the data reporting requirements for the other sources listed by the commenter. Please see response to EPA-HQ-OAR-2009-0923-1151-63 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-3568.5-3

Organization: Environmental Defense Fund

Commenter: Peter Zalzal

Comment Excerpt Text:

EDF likewise supports EPA's definition of an onshore production facility. By requiring facilities to report at the basin level, EPA has captured roughly 81 percent of emissions from the onshore production segment. While the alternatives EPA considered would provide substantially less emissions coverage without significant methodological differences.

Response: EPA thanks the commenter for their remarks. For further details, please see the response to EPA-HQ-OAR-2009-0923-1305-46.

Comment Number: EPA-HQ-OAR-2009-0923-1016-35

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Clarify that Leak Surveys are Not Required at Storage Wellheads

AGA requests clarification that leak surveys will not be required at storage wellheads. We are unsure whether this is the case, because of the different, potentially conflicting descriptions of what is covered in the source category, reporting requirements and leak survey requirements.

The source category description is very broad in 98.230(a)(5), and evidently includes storage wellheads. Underground storage facility fugitive emissions to be reported under section 98.232(f)(5) include components that could be found at storage wellheads. The first paragraph of section 98.233(q)] states that “[y]ou must use the methods described in 98.234(a) to conduct an annual leak detection of fugitive emissions listed in §98.232(f)(5).” Section 98.233(q) further states that “[i]f fugitive emissions are detected for sources listed in this paragraph, calculate emissions using Equation W-18...” which requires using “Leaker” emission factors “for the specific sources listed in Table W-2 through Table W-7. Section 98.233(q)(4) refers to “storage stations” but does not mention wellheads:

(4) Underground natural gas storage facilities for storage stations shall use the appropriate default leaker emission factors listed in Table W-4 of this subpart for fugitive emissions detected from connectors; block valves; control valves; compressor blow down valves; pressure relief valves; orifice meters; other meters; regulators; and open ended lines.

Proposed section 98.233(r)(4) provides:

(4) Underground natural gas storage facilities for storage wellheads shall use the appropriate default population emission factors listed in Table W-4 of this subpart for fugitive emissions from connectors; valves; pressure relief valves; and open ended lines.

Table W-4, in turn includes Population Emission Factors—Storage Wellheads, Gas Service. It is our understanding that EPA intends that leak surveys and leaker emission factors will not apply to fugitives at storage wellheads, and instead operators will need to do component counts and then use population emission factors.

To clarify the rule so that it achieves that result, we request that EPA revise the first paragraph of 98.233(q) to make it clear that leak surveys and leaker emission factors do not apply to 98.232(f)(5) components located at storage wellheads.

Response: EPA disagrees that the monitoring requirements – and specifically the leak detection requirements – are ambiguous. In today’s final rule it is stated that population emission factors are used for storage wellheads; thus, no leak detection is required. However, leak detection is required at storage compression facilities, referred to as storage stations. Table W-4 of today’s final rule supplies leaker emission factors for storage stations and population emission factors for storage wellheads.

Comment Number: EPA-HQ-OAR-2009-0923-1018-54

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

98.236 (d):

With respect to providing the minimum, maximum and average throughput for each operation listed in paragraphs (a)(1) through (a)(8) of this section, CAPP requires clarification on which level this information is required for: basin, field, facility, source.

Response: EPA agrees with the comment and has made clarifications in today's final rule. For further details, please see the response to EPA-HQ-OAR-2009-0923-1024-36.

Comment Number: EPA-HQ-OAR-2009-0923-1019-6

Organization: Red Cedar Gathering

Commenter: Ethan W. Hinkley

Comment Excerpt Text:

Combining Facility Emissions for Natural Gas Processing Facilities and Compressor/Booster Stations

According to EPA's definition of Onshore Natural Gas Processing Plants all field gathering and/or boosting stations that gather and process natural gas from multiple wellheads, and compress and transport natural gas as feed to the natural gas processing plant are considered a part of the processing plant. Red Cedar is requesting clarification and direction from EPA as to how to group these facilities in situations where there is not direct gas flow from the field compressor station to the processing plant. Much of Red Cedar's system consists of field compressor stations that feed compressed and dehydrated gas into a common medium pressure pipeline. From this pipeline the gas can go to multiple processing plants. In general, how does EPA anticipate the reporting of systems similar to this?

Response: Today's final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1021-1

Organization:

Commenter: Michael Leonard

Comment Excerpt Text:

If a facility falls under the reporting requirements of (98.2 (a)(3)), the facility would not be required to report under any other Subpart, including Subpart W due to the following verbiage: For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only. We propose that clarification be made as to whether or not a facility would need to report under Subpart W if it falls under the reporting requirements of (98.2 (a)(3)).

Response: Please see response to EPA-HQ-OAR-2008-0508-1741 in Volume 12, Subpart A: Applicability and Reporting Schedule, of the EPA's Response to Public Comments for the Final MRR for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1062-1

Organization:

Commenter: Michael Leonard

Comment Excerpt Text:

If a supplier falls under the reporting requirements of (98.2 (a)(4), for this supplier, the annual GHG report must cover all applicable products for which calculation methodologies are provided in subparts KK through PP of this part. We request clarification that a as described in (98.2 (a)(4) would not be required to report under Subpart W

Response: The general provisions state in 98.1(b) that "Owners and operators of facilities and suppliers that are subject to this part must follow the requirements of subpart A and all applicable subparts of this part." Further, Section 98.2(a) clarifies that owners and operators of facilities meeting the requirements of the paragraphs referenced in Section 98.2(a), and any supplier that meets the requirements prescribed in Section 98.2 must report to EPA. Therefore, depending on individual circumstances, an owner or operator may be required to report both as a facility that directly emits GHG's or as a supplier of industrial GHGs.

Comment Number: EPA-HQ-OAR-2009-0923-1176-2

Organization: Citizens Energy Group

Commenter: Ann W. McIver

Comment Excerpt Text:

As well, Section 98.232(g) does not clearly explain how gas lines, burners, control linkages, gauges, valves and other auxiliary equipment associated with vaporizers at LNG plants are accounted under the scope of this rule. For example, does the rule intend for LNG facilities to count vaporizers as a single unit or is every valve, connector, burner, and gauge counted?

Response: LNG storage facilities shall use the appropriate default population emission factors listed in Table W-5 of today's final rule for equipment leak from vapor recovery compressors. As a result, LNG facilities may count vaporizers as a single unit. For further details, please see Section 98.233(q) of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1298-53

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(d): This requirement states that an operator must report the "minimum, maximum

and average throughput for each operation listed in paragraphs (a)(1) through (a)(8) of this section.” This is a very vague request, and EPA does not specify which “throughput” values are required here for each of these reporting sectors. This adds an additional layer of reporting that is unwarranted. IPAMS requests that EPA clarify what is being requested, explain why this information is needed within the context of the specific goal of the emissions reporting rule, and how these data will be used.

Response: EPA has added clarification to Section 98.236(d) of the rule text . For further details, please see the response to EPA-HQ-OAR-2009-0923-1024-36.

Comment Number: EPA-HQ-OAR-2009-0923-1306-17

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

In Sec. 98.230(a) it is stated which industry segments of the petroleum and natural gas sector are subject to the reporting requirements of proposed Subpart W. Section 98.232 then defines which source types must be reported for each industry segment. However, it is not explicitly stated whether or not a single facility can be subject to reporting emissions for source types from multiple industry segments.

DTE Energy requests that EPA clarify the GHGs that a single facility must report when that facility includes source types from multiple industry segments. DTE Energy operates several compressor stations for the purpose of underground natural gas storage. These compressor stations are connected directly to the transmission system and contain limited amounts of processing equipment. It is not clear if such a facility is required to report emissions from source types listed under onshore natural gas transmission compression, underground natural gas storage, and onshore natural gas processing, or from only underground natural gas storage.

Response: EPA has clarified in today’s final rule that a segment shall report emissions from sources listed under that segment in Section 98.232 of the rule. Furthermore, EPA has also clarified how to deal with co-located facilities and dual purpose equipment. Please see response to EPA-HQ-OAR-2009-0923-1024-14 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1306-18

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

To add to the confusion, in 98.236(a) it is stated that emissions will be reported separately for each industry segment. In the attached tables of Subpart W, different industry segments have different emission factors for the same component type. For example, Table W-3 includes emission factors for components in the transmission segment that are different than the emission factors provided in Table W-4 for the components in the underground storage segment. In

98.233(q) it is not clear if the emission factors from Table W-3 or Table W-4 would be used for a storage station that is directly connected to a transmission pipeline. DTE Energy requests clarification on how to determine which emission factors will be used for facilities falling under more than one industry segment and how such facilities would be able to report emissions for each industry segment.

DTE Energy requests that any differentiation of industry segments has clear facility definitions and leaves no ambiguity as currently exists for reporting emissions.

Response: In today's final rule, EPA has clarified how to deal with co-located facilities and dual purpose equipment and use of respective monitoring methods. Please see response to EPA-HQ-OAR-2009-0923-1024-14 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1059-18

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

MDU does not know if the EPA is defining a meter and regulator station to include all meter and regulator stations. The current presentation of the term in the Subpart W Rule is interpreted to include residential, commercial, and industrial meter and regulator stations, district stations, and city gate stations. Each MDU LDC has approximately 250,000 to 330,000 residential, 11,000 to 50,800 commercial and 115 to 2,700 industrial meter and regulator stations. It would be excessively burdensome to apply the Subpart W Rule reporting requirements to all of these meter and regulator stations.

Response: Today's final rule clarifies that EPA specifically defines meter and regulator stations to not include the following: 1) all cutcustomer meters, 2) the customer meters and pipelines serving major industrial users directly, and 3) "farm taps." See the definition of natural gas distribution in Section 98.238 for more details.

Comment Number: EPA-HQ-OAR-2009-0923-0049-8

Organization: American Gas Association

Commenter: Pamela Lacey

Comment Excerpt Text:

Second, EPA needs to clearly define the term "M&R station" to include industrial metering and regulating equipment, but to exclude all commercial and residential customer metering and regulating sets.

Response: Today's final rule clarifies that sources subject to reporting in the natural gas distribution segment do not include customer and residential meters. Please see response to EPA-HQ-OAR-2009-0923-1059-18.

Comment Number: EPA-HQ-OAR-2009-0923-0055-10

Organization: Indaco Air Quality Services, Inc.

Commenter: Touche Howard

Comment Excerpt Text:

Suggestion 3: Eliminate the Requirement for Component Counts at Compressor Stations
Section 98.236 (c) (19) (i) requires a component count for each fugitive emissions source. It's not quite clear if this means a full component count of all components in natural gas service, or a list of all leaking components. If a full component count is intended, this adds a substantial amount of work to the surveys of compressor stations but does not provide any information needed to calculate emissions, since the proposed method is based on leaking components and leaker emission factors. Eliminating this requirement allows more focus on accurate data collection and reporting.

Response: EPA agrees that it would be beneficial to clarify the data reporting requirements regarding component counts of detected leaks. EPA intended this requirement to mean only a component count for leaking components. Section 98.236(c)(15) of today's final rule clarifies that only counts of components detected to be leaking are required by component type.

Comment Number: EPA-HQ-OAR-2009-0923-0055-4

Organization: Indaco Air Quality Services, Inc.

Commenter: Touche Howard

Comment Excerpt Text:

Eliminate the requirement for component counts at compressor stations;

Response: Please see the response to EPA-HQ-OAR-2009-0923-0055-10.

Comment Number: EPA-HQ-OAR-2009-0923-1016-32

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Reduce Number of Components Requiring Leak Surveys

AGA appreciates that the 2010 Proposal includes significant improvements from the April 2009 version with respect to wellhead fugitive emissions. Specifically, we appreciate EPA's revised proposal apparently would allow the use of component counts rather than requiring leak surveys at underground storage wellheads, although the regulatory language needs to be clarified in this regard, as we discuss below.¹⁶ However, as we contend elsewhere in these comments, EPA should either allow the use of facility level emission factors or reduce the number of components requiring leak surveys at underground storage stations. This will help to further reduce compliance burdens and costs for underground natural gas storage facilities.

Response: EPA disagrees with the commenter that EPA should allow the use of facility level emission factors or reduce the number of components requiring surveys. EPA has determined that facility level emission factors for underground storage facilities have high uncertainty and are not suitable to inform future public policy. Please see response to EPA-HQ-OAR-2009-0923-1011-19 for further details. Underground storage stations are similar to transmission storage stations and leak detection is manageable with reasonable burden. Furthermore, compressors at underground storage stations are large sources of GHG emissions that EPA intends to capture in today's final rule. Hence, EPA has retained leak survey requirements for underground storage stations.

Comment Number: EPA-HQ-OAR-2009-0923-3546-2

Organization: Texas Commission on Environmental Quality

Commenter: Mark R. Vickery

Comment Excerpt Text:

The TCEQ agrees that the addition of sources from the onshore petroleum and natural gas production sector will include emissions from a large source of human-made methane emissions. In its rule proposal, the EPA requested comment on whether reporting should be at a basin or a field level for the onshore petroleum and natural gas production sector. The TCEQ is satisfied that the basin level provides a more complete coverage of emissions. However, reporting burden remains a concern for the TCEQ. The commission notes that regardless of whether reporting is a field or a basin, much of the data requested such as fugitive valve counts are not currently known nor can be obtained from a central location for many of the reporters. The oil and gas industry covers a large territory and locating or developing the data for reporting by the first due date will be resource intensive and expensive. A phased-in approach reporting is recommended for equipment level information and component counts.

The EPA used a decision tree to decide which are the most significant sources to include in the reporting rule. However, several sources, that were not determined from this methodology were included in the list of sources for reporting because EPA considered them under or over-reported. These are condensate and oil storage tanks, natural gas well workovers, natural gas well completions, natural gas well blowdowns, centrifugal compressor wet seals, and flares. If any of these listed sources is not a significant source of greenhouse emissions, the EPA should remove it.

Response: There is a burden associated with counting of components at well sites and in order to manage this burden, EPA has made changes to the proposed rule. In the final rule, EPA requires the counting of major equipment as opposed to individual components. See Section II.F of the preamble for further details. EPA has in the final rule made several changes that will make it easier for onshore reporters to collect data and report emissions. However, EPA has also made provisions for BAMM under certain conditions. See Section II.F of the preamble for further details.

EPA added a limited number of sources to the rule without consideration to the decision tree in those cases because the magnitudes of emissions from those sources are large yet these large

emissions are not reflected in the National GHG Inventory. This has been determined through EPA experience in the Natural Gas STAR Program and also through the EPA National GHG Inventory where the reductions of emissions from these sources as reported by Natural Gas STAR Partners is higher than the emissions estimated in the National Inventory. See Appendix B of the TSD for further details on re-estimation of emissions from certain sources where some public data is available.

Comment Number: EPA-HQ-OAR-2009-0923-1059-7

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

The EPA did not provide a direct reason in the Subpart W Rule to require these small fugitive GHG emissions sources, emitting much less than 25,000 tons of CO₂e per year, to report as it did for the larger source categories in the main rule published in September 2009.

Response: With regard to reporting requirements for smaller sources, EPA has determined the selected threshold maximizes the rule coverage with 85 percent of U.S. GHG emissions while keeping reporting burden to a minimum. Furthermore, many industry stakeholders that EPA met with expressed support for a 25,000 metric ton CO₂e threshold because it sufficiently captures the majority of GHG emissions in the U.S., while excluding most of the smaller facilities and sources. In response to the comments EPA received about the monitoring and reporting requirements in specific source categories, EPA incorporated changes that reduce burden on reporters while maximizing emissions coverage. For information on these issues, refer to Section II.F of the preamble. Please see Section III.D of the preamble for a discussion of impacts of the rule on small businesses.

Comment Number: EPA-HQ-OAR-2009-0923-1064-3

Organization: Vorys, Stater Seymour and Pease LLP

Commenter: Gregory D. Russell

Comment Excerpt Text:

Still, much of Ohio's production - both oil and gas - is marginal in nature. According to the Interstate Oil and Gas Compact Commission (IOGCC), eighty-three percent of the oil produced in Ohio in 2007 came from marginal wells producing at an average rate of 0.43 barrels of oil per day.²⁶ Similarly, seventy-seven percent of the natural gas produced in Ohio came from marginal wells producing at an average rate of only 5.5 Mcf per day.²⁷ This production is continually at risk of being abandoned prematurely because of the attendant economics – economics that are

²⁶ IOGCC, *Marginal Wells: Fuel for Economic Growth* at 5 (2008). The IOGCC is a multi-state government agency tasked with protecting the health, safety and environment of the country's citizens while promoting the conservation and efficient recovery of our nation's oil and gas resources.

²⁷ *Id.* at 10.

getting worse with the declining economy, increasing taxes and fees, and more threatening regulatory climate. Yet, to quote the IOGCC: "In addition to supplying much needed energy, marginal wells are important to communities across the country, providing jobs and driving economic activity. In fact, every \$1 million directly generated by marginal production results in more than \$2 million of activity elsewhere in the economy."²⁸ Requiring America's energy producers to monitor and report at the Basin level by definition is certain to raise the regulatory costs for Ohio producers and thereby threaten needed production, jobs and economic activity.

Response: EPA threshold analysis has determined that a small number of producers who own a large number of marginal wells will be impacted by the rule. See response EPA-HQ-OAR-2009-0923-0053-1 for further details. In fact, EPA threshold analysis shows that there will be approximately only five reporters producing from marginal wells from Ohio. Also, EPA is planning to provide screening tools that will mitigate any burden issues relating to determination of whether or not to report. See Section II.E of the preamble for further details. Finally, EPA does not anticipate any wider economic impact due to the rule. See Section II.F of the preamble and "Subpart W Greater Economic Impact" for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1064-4

Organization: Vorys, Stater Seymour and Pease LLP

Commenter: Gregory D. Russell

Comment Excerpt Text:

In the event that U.S. EPA decides to impose on America's oil and gas producers these new regulatory obligations, an exemption for small producers is essential. The Association first urges U.S. EPA to adopt a general small producer exemption for production that meets the definition of marginal well production as provided for by either the IOGCC or the federal tax code. Moreover, in the event that U.S. EPA decides to impose these regulatory obligations at the corporate - and not facility - level based on an operator's aggregate Basin-production (as now proposed by EPA), the Association urges EPA to adopt a small producer exemption based on annual production volumes of 2.2 Bcf (billion cubic feet) per calendar year as measured at the Basin level.²⁹

Response: EPA has conducted small business analysis that does not indicate any significant impact on small businesses, hence an exemption is unwarranted. See Section 5 of the Economic Impact Analysis for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1206-10

Organization: Gas Processors Association

²⁸ U.S. Dept. of Energy, Energy Information Administration (www.eia.doe.gov); Independent Petroleum Association of America, Industry Statistics (<http://www.ipaa.org/reports/industrystats/default.asp>).

²⁹ This would be similar to the exemption adopted by the Federal Energy Regulatory Commission in Docket No. RM07-10.

Commenter: Jeff Applekamp

Comment Excerpt Text:

The proposed Subpart W, however, treats these small and widely dispersed facilities as if they are the same size and complexity of a gas processing plant. Examples of proposed requirements that may be appropriate for processing plants but unduly burdensome for small and widely dispersed gathering compression facilities include: collecting extensive data and modeling tank emissions, compressor rod packing vents, leak detection using optical imaging or population factors, and quarterly sampling of gas streams.

Response: Today's final rule does not include gathering lines and boosting systems. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1202-9

Organization: Enterprise Products

Commenter: Rodney Sartor

Comment Excerpt Text:

Direct Measurement - Direct measurement of emissions from certain sources is unnecessary for an inventory and inappropriate because of the assumption that direct measurement data is essentially more accurate than emission factors.

- a. The inclusion of direct measurement seems unnecessary and inconsistent with current requirements associated with other inventory practices, such as those used for annual criteria pollutant emissions inventories.
- c. EPA has not proposed or included any standard operating procedures or quality assurance and control for the direct measurement methods. Without appropriate standards or methods for taking these measurements there would be a huge potential for error and variance which would negate any assumed benefit of direct measurement methods.
- d. The reasoning behind collecting direct measurement data is flawed because it assumes that a snapshot measurement applied across an entire year is more accurate than an emission factor developed from well documented and controlled studies. Increasing the number of direct measurement data samples would create an undue burden on resources while not increasing accuracy as indicated in the paragraphs above.

Response: The commenter does not provide specifics on how EPA required direct measurements of certain sources are unnecessary. The commenter also does not provide any particular reference to what the current inventory practices are for EPA to provide response. Accordingly, EPA cannot directly respond to either point. EPA has a judicious approach to direct measurement based on careful deliberation and analysis. Only major emissions sources that do not have valid emissions factors or an engineering estimation method use direct measurement. Please see chapter (4)(c)(ii) of the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923) for the decision tree use to select the quantification methodologies for each emission source. Additionally, many of the direct measurement

requirements in the proposed rule have been replaced with emission factors in today's final rule. Please see Section II.E of the preamble for further details.

EPA has included references to standards for use of measurement devices and instruments in the Monitoring and QA/QC requirements of the rule. For example, instruments used in equipment leak detection are referenced to EPA's Method 21 of the LDAR Program, or the Alternate Work Practice for the LDAR Program for the infrared leak imaging cameras.

The commenter does not provide any information on the well-documented and controlled studies. EPA is not aware of any studies that conclusively provide information on emissions sources where direct measurement is being required. In fact, the very reason direct measurement is being required is because there is a dearth of data for these sources. Although EPA recognizes that a one time snapshot of a few sample data points is not most accurate, EPA determined it sufficient to inform policy – some data is better than no data. Hence, considering the above points, EPA has retained direct measurement for certain sources in today's final rule where required.

Note, there was no comment “b” submitted by the commenter above.

Comment Number: EPA-HQ-OAR-2009-0923-0055-9

Organization: Indaco Air Quality Services, Inc.

Commenter: Touche Howard

Comment Excerpt Text:

Suggestion 4: Allow Surveys of Compressors to Take Place in an “As Found” Mode, as Opposed to Surveying All Three Modes.

Section 98.233 (p) requires that all compressor vents be surveyed in each of the operational modes that occurs during a reporting period (operating, standby pressurized, and not operating – depressurized). It is certainly true that the mode of a compressor unit can substantially affect the leak rates observed from the vented components. However, requiring a survey of all three modes creates enormous challenges and some unwanted consequences.

First, surveying all three modes will require an additional blow down event per unit, because if a unit is on line it would have to be taken off line and then blown down to survey the depressurized mode. On the other hand, if a unit were already blown down, it would have to be pressurized and put on line, and then after the measurements were made, it would be taken back off line and blown down.

Second, putting a unit on line temporarily may not provide a representative measurement since the rod packings may not be properly warmed up or it may have to be placed in a recirculating mode if there is no extra gas capacity in the pipeline.

Third, it may not be feasible to take a unit off line due to pipeline demand – requiring a unit to come off line might disrupt gas supply and operations. This may be especially true in the production sector where there may not be any additional units with which to switch.

A more workable approach would be to allow facilities to survey the compressor units in an “As Found” mode, where the compressor unit is surveyed in whatever mode it is operating in when the survey takes place. The data from each mode can then be used to calculate a system specific emission factor for each mode, and then the emissions can be projected using operating hours (which would also need to detail whether units are pressurized or depressurized when taken off-line). Since most units will spend most of their time off line either pressurized or blown down (as opposed to both), there will usually be only two modes in the calculation.

One way to ensure that this approach is representative would be to require that at least 50% of the units owned or operated by a company that are subject to these measurements would be surveyed in their primary mode (the mode in which they spend the most time) at least once every three years.

Using this approach, each unit would continue to be surveyed annually using the “As Found” basis. If by the third year of the program at least 50% of the compressor units owned or operated by a given company had not been surveyed in their primary mode, then the survey plan in the third year would require that enough units were surveyed in the primary mode to meet the 50% requirement. Some units might have to have their operating mode switched or might have to be surveyed again at a later date. However, this approach would provide flexibility to facility operators while still providing a realistic sampling of operating modes. The three year window would also give companies more time to install taps or meters in vent systems if they so desire to provide easier monitoring.

Note: A clarification is needed between Section 98.233 (p) (2) (i) which requires the measurement of compressor blow down vents along with other compressor unit vents and Section 98.233 (q) (3) which indicates that compressor blow down vents should be surveyed using an IR camera and then the “leaker” emission factor applied to calculate leakage.

Further discussion of the contribution of compressor modes is provided in the Appendix of this letter.

Response: EPA agrees with the comment with the exception that EPA is also requiring a measurement of emissions from compressors in the not operating, depressurized mode at least once every three years. For further details, please see the rulemaking docket EPA-HQ-OAR-2009-0923 under “Compressor Modes and Threshold”.

Comment Number: EPA-HQ-OAR-2009-0923-3546-4

Organization: Texas Commission on Environmental Quality

Commenter: Mark R. Vickery

Comment Excerpt Text:

The TCEQ has experienced difficulty obtaining tank flash emissions reporting from some reporters. It is recommended that the rule language specifically state that all emissions losses from tanks should be reported: working, breathing, and flashing.

Response: Typically, working and breathing losses are a smaller portion of total emissions from tanks where the majority of the emissions result from flashing losses. Therefore, today's final rule includes methods that would estimate only flashing losses (where the source of pressure oil from a gas-liquid separator is sent offsite to an atmospheric storage tank not owned or operated by the reporter) and any emissions that result from malfunctioning separator dump valves. Other simplified methods included in today's final rule would account for all GHG emissions from storage tanks: namely, a method where the reporter assumes all methane and CO₂ in the crude oil going to tankage will be emitted. Therefore, while the rule does not require reporters to determine working and breathing losses, some methods will account for these small emissions as well as the primary emission source required by the rule: flashing losses and emissions from malfunctioning separator dump valves. If further data regarding working and breathing losses becomes available, EPA may reconsider collecting data from this source through an amendment or other mechanism.

Comment Number: EPA-HQ-OAR-2009-0923-1016-2

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

In the original MRR proposal, we were particularly concerned that EPA had proposed in Subpart NN to require annual calibration of all meters – a proposal that would have cost natural gas utilities and their retail and residential customers \$14.9 billion per year to remove from service, calibrate and replace over 65 million residential and commercial customer meters every year, causing major resource burdens on gas utility operations and serious disruptions in service. AGA appreciates the agency's decision to clarify in the Final MRR that gas utilities would not be required to conduct costly, duplicative annual calibration on customer meters, but instead could use normal utility-commission regulated standard industry practices to calibrate meters and to measure the natural gas deliveries to customers for purposes of estimating the GHG emissions resulting from the customers' combustion of natural gas for home heating, water heating, and other customer equipment.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-1155-33

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

EPA must more carefully account for the life cycle emissions fuels produced and used in the oil and gas sector. We recommend two general categories of improvements.

a. Improving the Data Reporting Requirements for Crude Feedstocks

EPA proposes that refiners report “basic information to EPA on the crude oil feedstock type, API gravity, sulfur content and country of origin during the reporting period. This basic information on the feedstock characteristics would provide useful information to EPA to assess the lifecycle GHG emissions associated with petroleum refining.”³⁰ Assessing the lifecycle GHG emissions associated with petroleum refining is critical to monitoring and controlling GHG emissions. It is already required under U.S. law in the 2007 Energy Independence and Security Act (EISA), Section 526. More detailed reporting would improve implementation of EISA Section 526 and any future lifecycle GHG emissions assessment requirements.

Because petroleum arrives in many forms to refiners and importers, the feedstock characteristics listed in the proposed reporting rule are not sufficient to estimate the lifecycle GHG emissions of a particular type of petroleum product. For example, in order to assess the lifecycle GHG emissions of petroleum, it is necessary to know how the petroleum was extracted, the type of upgrading and refining it had to undergo, and how it was transported. The EPA cannot determine, based on the proposed required characteristics alone, whether the petroleum, for example originated in the Canadian tar sands which carry a heavier production process GHG emission burden than conventional oil and whether, for example, the extraction was done through strip-mining or through steam assisted gravity drainage or a similar in situ process both of which have very different GHG emissions associated with them.³¹ The rule should include a way to identify lifecycle emissions from different types of extraction processes. Identification of the petroleum recovery method, or the process used, would allow estimates of the associated upstream emissions to be made for petroleum products.

A second tier of information to more accurately identify lifecycle GHG emissions would be to include an additional reporting requirement, requiring refiners and importers to report not only on the feedstock’s country of origin, but also on its particular facility of origin. That way, the EPA will have more accurate information of how the petroleum was extracted, the type of upgrading and refining which it underwent, and how it was transported. The EPA could also, in many instances, associate the upstream facility emissions with a particular product. This would allow for the best information to be on hand in order to conduct a more accurate measure of a fuel’s lifecycle GHG emissions.

Response: Suppliers under subpart MM report feedstock information, if available, but reporters under subpart W, particularly onshore and offshore production, will report a significant share of the emissions associated with oil and gas production in the United States. At this time, however, a full life-cycle accounting of fossil fuel emissions is beyond the scope of this rule.

Comment Number: EPA-HQ-OAR-2009-0923-1171-3

Organization: Western Resource Advocates

Commenter: Robert Harris

³⁰ 74 Fed. Reg. at 16,573.

³¹ Mui, Simon, Doug Hannah and Roland Hwang, Lifecycle Analysis of Greenhouse Gas Emissions from Tar Sands. NRDC White Paper. November 2008 (Ex. 53).

Comment Excerpt Text:

The Proposed Rule unjustifiably excludes all relevant onshore production sources, listed at proposed section 98.232(c), from mandatory annual leak detection of fugitive GHG emissions. Proposed 40 C.F.R. § 98.233(q). Identifying and fixing GHG leaks on oil and gas production facilities ranks among the lowest of the “low-hanging fruit” in fighting climate change. The Proposed Rule misses an opportunity to promote reductions in GHG emissions and conservation of hydrocarbons for economically beneficial use.

Response: Under 98.232(c) for onshore petroleum and natural gas production, one must report emissions from for example equipment leaks from valves, connectors, open ended lines, pressure relief valves, pumps, flanges, and other equipment leak sources (such as instruments, loading arms, pressure relief valves, stuffing boxes, compressor seals, dump lever arms, and breather caps) and therefore EPA is requiring data collection from sources from which emitted hydrocarbons could be economically useful.

Comment Number: EPA-HQ-OAR-2009-0923-0030-1

Organization: NDTrak Technologies

Commenter: Roger Cobert

Comment Excerpt Text:

Did the EPA mean to exclude “98.232 (c)(21) Onshore petroleum and natural gas production -- Fugitive emissions from valves, connectors, open ended lines, pressure relief valves, compressor starter gas vents, pumps, flanges, and other fugitive sources (such as instruments, loading arms, pressure relief valves, stuffing boxes, compressor seals, dump lever arms, and breather caps for crude services).” from the requirements set forth in “98.232(q) Leak detection and leaker emission factors”?

If so, what might be the reasoning?

Response: EPA intended onshore petroleum and natural gas production not to use leak detection and leaker emissions factors in the proposal, since onshore production uses population emissions factors. In today’s final rule, onshore production still uses population emissions factors, but has to count major equipment as opposed to individual components. Please see Section II.F of the preamble for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1018-4

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Finally CAPP recognizes the need to have access to source level information for flaring and venting emissions, however many of these sources are combined and routed to a common flare or vent header. There is extensive information available from facilities on the composition and

flow rate of vented or flared gas based on the combined header, but there is significantly less data available at the source level for the common header. As the primary goal of the MRR is to obtain high quality GHG emission data from facilities CAPP recommends, in the case of common flare and vent headers, that the facility be allowed to report on the common header flow rates and emissions instead of disaggregating those emissions to the source level where errors may be introduced.

Response: EPA disagrees with the commenter on reporting of flow to a flare form a common header. With regards to emissions passing through common flares and vent headers, please see the response to EPA-HQ-OAR-2009-0923-1024-31.

Comment Number: EPA-HQ-OAR-2009-0923-1018-57

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Table W-8

During the review of W-8 CAPP noticed that the N₂O emission factors presented in Table W-8 were not appropriate for estimating emissions at a source level. These factors represent metric tonnes of N₂O emissions from flaring per MMscf of gas production or receipts, and were intended to estimate N₂O emissions from flaring at a country level when flare volumes are not known but total gas production is. Since the amount of gas flared from a particular source, and hence its N₂O emissions, has nothing to do with the amount of production or receipts for the facility, these factors cannot be used as intended. To illustrate this CAPP has created the following example:

Facility 1 – Gas Processing	Facility 2 – Gas Processing
Flared volume 100 mscf	Flared volume 1000 mscf
Throughput 1000 mmscf	Throughput 100 mmscf
N ₂ O emissions = 1000 mmscf	N ₂ O emissions = 100 mmscf
1000 mmscf* 5.9E-7 tonne/mmscf	100 mmscf* 5.9E-7 tonne/mmscf
N ₂ O emissions = 5.9E-4 metric tonnes	N ₂ O emissions = 5.9E-5 metric tonnes

The results above show that Facility 2 flares 10 times the volume of gas as Facility 1; however it estimated emissions are one-tenth of those of Facility 1 based on the emission factors presented in Table W-8. As a result CAPP recommends that the EPA replaces the N₂O emissions factors in this table with those that are more representative for source level emissions.

Response: In today’s final rule, EPA no longer requires the use of these emission factors, but has moved to factors used in subpart C. Where appropriate factors are not available for the fuel

stream being flared, reporters will use the composition and equations to develop factors as outlined in today's final rule text.

Comment Number: EPA-HQ-OAR-2009-0923-1024-48

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

SECTION 98.236 Data reporting requirements.

In addition to the information required by SECTION 98.3(c), each annual report must contain reported emissions as specified in this section.

(a) Report annual emissions separately for each of the industry segment listed in paragraphs (a) (1) through (8) of this section. For each segment, report emissions from each source type in the aggregate, unless specified otherwise. For example, an underground natural gas storage operation with multiple reciprocating compressors must report emissions from all reciprocating compressors as an aggregate number.

(1) Onshore petroleum and natural gas production.

(2) Offshore petroleum and natural gas production.

(3) *Field gathering and/or boosting stations.*

(3) Onshore natural gas processing *plants.*

(4) Onshore natural gas transmission compression.

(5) Underground natural gas storage.

(6) LNG storage.

(7) LNG import and export.

(8) Natural gas distribution. Report each source in the aggregate for pipelines and for Metering and Regulating (M&R) stations. (b) Report emissions separately for standby equipment. (c) Report activity data for each aggregated source type as follows: (1) Count of natural gas pneumatic high bleed devices. (2) Count of natural gas pneumatic low bleed devices. (3) Count of natural gas driven pneumatic pumps. (4) For each acid gas removal unit report the following: (i) Total volume of natural gas flow into the acid gas removal unit. (ii) Total volume of natural gas flow out of the acid gas removal unit. (iii) Volume weighted CO₂ content of natural gas into the acid gas removal unit. (5) For each dehydrator unit report the following: (i) Glycol dehydrators: (A) Glycol dehydrator feed natural gas flow rate. (B) Glycol dehydrator absorbent circulation pump type. (C) Glycol dehydrator absorbent circulation rate. (D) Whether stripper

gas is used in glycol dehydrator. (E) Whether a flash tank separator is used in glycol dehydrator. (ii) Desiccant dehydrators: (A) The number of desiccant dehydrators operated. (B) [Reserved]

(6) Count of wells vented to the atmosphere for liquids unloading for each field in the basin.

(7) Count of wells venting during well completions for each field in the basin. (i) Number of conventional completions. (ii) Number of completions involving hydraulic fracturing.

(8) Count of wells venting during well workovers for each field in the basin. (i) Number of conventional well workovers involving well venting to the atmosphere. (ii) Number of unconventional well workovers involving well venting to the atmosphere.

(9) For each compressor blowdown vent stack report the following for each compressor: (i) *List of emissions sources routed to the vent.* (ii) Type(s) of compressor whether reciprocating or centrifugal. (iii) Compressor capacity in horse powers. (iv) Volume of gas between isolation valves. (v) Number of blowdowns per year.

(10) For each estimate of gas emitted from liquids sent to atmospheric tank using E&P Tank report the following: (i) Immediate upstream separator temperature and pressure. (ii) Sales oil API gravity. (iii) Estimate of individual tank or tank battery capacity in barrels. (iv) Oil, hydrocarbon condensate and water sent to tank(s) in barrels. (v) Control measure: either vapor recovery system or flaring of tank vapors.

(11) For tank *dump valve malfunction* emissions identified using optical gas imaging instrument per SECTION 98.234(a), report the following for each tank: (i) Immediate upstream separator temperature and pressure. (ii) Sales oil API gravity. (iii) Tank capacity in barrels. (iv) Tank throughput in barrels. (v) Control measure: either vapor recovery system or flaring of tank vapors. (vi) Optical gas imaging instrument used. (vii) *Equipment* used for measuring emissions. (viii) List of emissions sources routed to the tank.

(12) For well testing report the following for each field in the basin: (i) Number of wells tested in reporting period. (ii) Average gas to oil ratio for each field. (iii) Average flow rate during testing for each field. (iv) Average number of days the well is tested. (v) Whether the hydrocarbons produced during testing are vented or flared.

(13) For associated natural gas venting report the following for each field in the basin: (i) Number of wells venting or flaring associated natural gas in reporting period. (ii) Average gas to oil ratio for each field. (iii) Average volume of oil produced per well per field. (iv) Whether the associated natural gas is vented or flared.

(14) For flare stacks report the following for each flare: (i) Whether flare has a continuous flow monitor. (ii) If using engineering estimation methods, identify sources of emissions going to the flare. (iii) Whether flare has a continuous gas analyzer. (iv) Identify proportion of total natural gas to pure hydrocarbon stream being sent to the flare annually for the reporting period. (v) Flare combustion efficiency.

(15) For well venting for liquids unloading report the following by field, basin, and well tubing size: (i) Number of wells being unloaded for liquids in reporting year. (ii) Average number of unloading(s) per well per reporting year. (iii) Average volume of natural gas produced per well per reporting year during liquids unloading.

(16) For well completions and workovers report the following for each field in the basin: (i) Number of wells completed (worked over) in reporting year. (ii) Average number of days required for completion (workover). (iii) Average volume of natural gas produced per well per reporting year during well completion (workover).

(17) For compressor wet seal degassing vents report the following for each degassing vent: (i) Number of wet seals connected to the degassing vent. (ii) Number of compressors whose wet seals are connected to the degassing vent. ~~(iii) Total throughput of compressors whose wet seals are connected to the degassing vent.~~ (iv) Type of meter used for making measurements. (v) Whether emissions estimate is based on a continuous or one time measurement. (vi) Total time the compressor(s) associated with the degassing vent stack is operating. Sum the hours of operation if multiple compressors are connected to the vent stack. (vii) Proportion of vent gas recovered for fuel gas or sent to a flare.

(18) For reciprocating compressor rod packing report the following per rod packing: ~~(i) Total throughput of the reciprocating compressor whose rod packing emissions is being reported.~~ (ii) Total time in hours the reciprocating compressor is in operating mode. *(iii) The operating mode during rod packing emissions measurement: (a) Operating. (b) Standby pressurized. (c) Not operating, depressurized.* (iii) Whether or not the rod packing case is connected to an open ended line. (iv) If rod packing is connected to an open ended line, report type of device used for measurement emissions. (v) If rod packing is not connected to an open ended vent line, report the locations from where the emissions from the rod packing are detected.

(19) For fugitive emissions sources using emission factors for estimating emissions report the following: (i) Component count for each fugitive emissions source. (ii) CH₄ and CO₂ in produced natural gas for onshore petroleum and natural gas production.

(20) For EOR injection pump blowdown report the following per pump: (i) Pump capacity. (ii) Volume of gas between isolation valves. (iii) Number of blowdowns per year. (iv) Supercritical phase EOR injection gas density.

~~(21) For hydrocarbon liquids dissolved CO₂ report the following for each field in the basin: (i) Volume of crude oil produced. (ii) [Reserved]~~

~~(22) For produced water dissolved CO₂ report the following for each field in the basin: (i) Volume of produced water produced. (ii) [Reserved] (d) Minimum, maximum and average throughput for each operation listed in paragraphs (a)(1) through (a)(8) of this section. (e) For offshore petroleum and natural gas production facilities, the number of connected wells, and whether the wells are producing oil, gas, or both. (f) Report emissions separately for portable equipment for the following source types: drilling rigs, dehydrators, compressors, electrical~~

generators, steam boilers, and heaters. (1) Aggregate emissions by source type. (2) Report count of each source type.

Response: EPA has not included gathering lines and boosting stations as an emissions source in subpart W at this time. For further information on this issue please see Section II.F of the preamble for a response to this comment.

As regards the change of term processing facility to processing plant, EPA has retained the use of the term facility for all segments of the industry. Please see response to EMAIL-0001-1 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923) for further details.

In regards to emissions to a compressor vent, EPA does not agree with the commenter. EPA needs emissions from isolation valves, blowdown valves, and rod packings that may be routed to a common vent line separately. Otherwise, EPA has no way to associate emissions with their respective sources, which does not help characterize the sources.

The EPA has decided not to clarify the data reporting requirements for transmission storage tanks as suggested by the commenter. Instead, the EPA decided to clarify that the emissions identified using an optical gas imaging instrument are for transmission storage tanks only. Additionally, EPA has removed the requirement to report the equipment used to measure emissions.

In today’s final rule, reporting requirements are not limited to blowdown events from compressor. Instead, any equipment with a physical volume greater than or equal to 50 standard cubic feet between isolation valves must report the emissions and total number of events for each equipment type separately.

The GHG calculation methodologies for centrifugal and reciprocating compressor venting have changed in today’s final rule. For further information on these changes, please see “Compressor Modes and Threshold” (EPA-HQ-OAR-2009-0023). Subsequently, the data reporting requirements for centrifugal and reciprocating compressors have changed. For more information on reporting the throughput, please see the response to EPA-HQ-OAR-2009-0923-1039-13.

In today’s rule, EPA does not require the monitoring of CO₂ from produced water at any onshore petroleum and natural gas production operations and subsequently the reporting requirements have been removed. For further information on sampling of produced water, please see the response to EPA-HQ-OAR-2009-0923-1151-129.

Reporting of emissions from hydrocarbon liquids dissolved CO₂ at EOR facilities was not removed in today’s final rule. For more information, please see the response to EPA-HQ-OAR-2009-0923-1011-21. Consequently, the reporting requirements have been retained.

Comment Number: EPA-HQ-OAR-2009-0923-1298-59

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

If EPA believes it is necessary to collect GHG emissions on a basin-wide basis, IPAMS requests that EPA change its proposed language to Proposed Subpart W Sections 98.238 and 98.230(2):

Section 98.238: Onshore petroleum and natural gas production ~~facility~~ threshold reporting area means all petroleum or natural gas facilities and equipment associated with all petroleum or natural gas production under common ownership or common control by an onshore petroleum and natural gas production owner or operator located in a single hydrocarbon basin as defined....

Section 98.230(2): Onshore petroleum and natural gas production: Onshore petroleum and natural gas production ~~equipment~~ threshold reporting area means all ~~structures~~ facilities associated with the production of petroleum or natural gas including but not limited to all structures associated with wells....

Response: EPA disagrees with the comment on the replacement of the term “facility” with “threshold reporting area”. For further details, please see the response to EMAIL-0001-1 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1060-11

Organization: Yates Petroleum Corporation

Commenter:

Comment Excerpt Text:

General Comments – Natural Gas Composition and Sampling Frequency

In the Technical Support Document (Page 44), the EPA states that, “these gas composition estimates are assumed to be available with facilities. But this may or may not be a practical assumption. In the absence of gas composition, periodic measurement of the required gas composition for a speciation of natural gas mass emissions into CH₄ and CO₂ could be a potential option.” Yates does not have gas composition estimates for all facilities required to report as there have been no previous regulatory requirements to do so. However, for facilities required to monitor fuel, Yates has found that the content of natural gas remains relatively constant by producing field. It is unnecessary to sample gas semi-annually or for every site, as the content changes over years, not months – and largely not by basin. Monthly gas samples are taken in fields that are still under development until the field stabilizes. Once the field stabilizes, those samples are generally taken no more frequently than semi-annually. Once a wellhead stabilizes and is tied into a gathering system, it is not industry practice to sample the fuel more frequently than semi-annually.

Therefore, Yates recommends that the EPA allow companies to collect representative gas samples by basin rather than site-by-site for sites required to do quarterly or semi-annual gas sampling as required by 98.233(d)(1) and 98.233(u)(2)(i).

Response: EPA does not agree with the suggestion to allow basin sampling rather than collection of quarterly site by site data for acid gas removal vent stacks. For further details, please see the response to EPA-HQ-OAR-2009-0923-1058-11. However, EPA has revised today's final rule to allow the gas analysis for produced gas in Section 98.233(u) to use the reporter's most recent gas composition based on available sample analysis of the field.

Comment Number: EPA-HQ-OAR-2009-0923-1080-15

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Section § 98.236(c)(18)(i) requires companies to report throughput for each compressor covered by Subpart W. Compliance with this requirement would require a flow meter to be installed on every affected compressor in the E&P sector. This requirement would be excessively costly because individual compressors typically are not equipped with flow meters, so countless new meters would have to be installed. Moreover, individual compressor throughput is data that is not useful to EPA for any reasonable policy or regulatory purpose

Response: The commenter has made several assumptions which are not consistent with EPA's intent. For further details on EPA's approach to compressor throughput, please see the response to EPA-HQ-OAR-2009-0923-1206-63. Also, please see Section II.F of the preamble for more information on Subpart W's data collection requirements for compressors.

Comment Number: EPA-HQ-OAR-2009-0923-1080-50

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Rolling-up gathering compression facility emissions with processing plant emissions is in conflict with EPA's assessment of the impact of the proposed Subpart W. EPA inaccurately states in the proposed Subpart W preamble:

... [T]here are a reasonable number of reporters. Most natural gas processing facilities proposed for inclusion in this supplemental proposed rulemaking would already be required to report under subpart C and/or subpart NN of the Final MRR. 75 Fed. Reg. at 18616.

In fact, this proposal will increase the number of facilities subject to Subpart C for compression GHG emissions by approximately 15 times. This level of reporting with no consideration for individual facility emission levels is neither reasonable nor appropriate.

Response: Today’s final rule does not require reporting of emissions from gathering and boosting segment of the industry. For further details, please see Section II.F of the preamble and the response to EMAIL-0002-1 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1298-51

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c)(9)(ii): This requirement states that the compressor capacity, in horsepower, must be reported for each compressor blowdown vent stack. This horsepower value is not required by the calculation methodology, so this requirement only creates an unnecessary recordkeeping and reporting burden on the operator. IPAMS requests that EPA remove this requirement.

Response: EPA agrees with the comment and has removed the requirement to report compressor capacity, in horsepower, from the Data reporting requirements.

Comment Number: EPA-HQ-OAR-2009-0923-1298-52

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c)(14)(iv): This requirement states that an operator must report the proportion of total natural gas to pure hydrocarbon stream being sent to a flare annually for the reporting period. This value is not required by the calculation methodology, so this requirement only creates an unnecessary recordkeeping and reporting burden on the operator. IPAMS requests that EPA remove this requirement.

Response: EPA agrees with the commenter that the requirement to report the proportion of total natural gas to pure hydrocarbon stream is unnecessary and has removed it from the data reporting requirements.

Comment Number: EPA-HQ-OAR-2009-0923-1305-5

Organization: BP America, Inc.

Commenter: Karen St. John

Comment Excerpt Text:

When re-structuring and finalizing the rule, EPA should take all opportunities to simplify the requirements and reduce burden. The rule should allow for simplified methods or outright exemptions for devices and operations that are below a size or threshold level. Such units may include, but are not limited to, ‘no-bleed’ pneumatic controllers; storage tanks and gas dehydrators with low throughputs; small compressors, small combustion units and similar sources.

- EPA should provide a simple screening approach to determine applicability. For example, a basin entity with 50 wells or less, at EPA's estimated emissions of 370 tonnes CO₂e per well, would have nominal emissions of less than 20,000 MT's and could be exempted from reporting. A screening system is necessary to avoid the necessity to fully monitor all sites and sources simply to determine threshold applicability.

Response: In today's final rule, EPA has simplified several requirements and reduced burden on the industry. For simplifications in methodologies and exemptions from the rule, please refer to Section II.F of the preamble. With regard to a few of these thresholds for dehydration units, onshore production storage tanks and small combustion units, please see the responses to EPA-HQ-OAR-2009-0923-1011-39, EPA-HQ-OAR-2009-0923-1061-10 and EPA-HQ-OAR-2009-0923-1024-23. In addition, EPA is in the process of developing screening tools to help with the applicability determination. Please see Section II.F of the preamble for more information on the screening tools that will be developed.

Comment Number: EPA-HQ-OAR-2009-0923-1016-45

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

LNG pumps and leakage via shaft seals.

The majority of LNG pumps at LNG facilities are not open to the atmosphere, either vertical turbine multistage pumps installed in pump wells submerged within the LNG tank, or pumps for which the motor and the pump are fully enclosed and submerged in LNG in the pump can.³² These pump types do not require pump shaft seals and are not open to the atmosphere, so they generate no fugitive emissions. For those facilities utilizing LNG pumps with external motors not enclosed within the pump can, and with pump shaft sealing, the seals are closely monitored, and if leakage were to occur, the pump would be shut down and repairs to the seal performed. Due to the level of redundancy of systems and equipment, LNG facilities are generally equipped with a number of spare pumps, allowing shutdown of any pump experiencing a seal failure, while maintaining facility operations.

Response: EPA disagrees with the commenter. Please see response to EPA-HQ-OAR-2009-0923-1299-12 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1298-31

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c)(2): IPAMS requests that EPA replace the word "count" with "estimate."

³² TSD Figure 4A and 4B.

Response: EPA reduced burden while maintaining the necessary data quality to inform future policy. EPA has revised the final rule to allow reporters to complete a count of total pneumatic devices in three years, with best available data being acceptable for years one and two if the count is incomplete to reduce burden while maintaining the necessary data quality to inform future policy. Furthermore, EPA allows reporters to update the total count of pneumatic devices based on changes in the system beyond year three of reporting. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1298-32

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c)(1): IPAMS requests that EPA replace the word “count” with “estimate.”

Response: EPA reduced burden while maintaining the necessary data quality to inform future policy. EPA has revised the final rule to allow reporters to complete a count of total pneumatic devices in three years, with best available data being acceptable for years one and two if the count is incomplete to reduce burden while maintaining the necessary data quality to inform future policy. Furthermore, EPA allows reporters to update the total count of pneumatic devices based on changes in the system beyond year three of reporting. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1298-34

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c)(3): IPAMS requests that EPA replace the word “count” with “estimate.”

Response: EPA reduced burden while maintaining the necessary data quality to inform future policy. EPA has revised the final rule to allow reporters to complete a count of total pneumatic devices in three years, with best available data being acceptable for years one and two if the count is incomplete to reduce burden while maintaining the necessary data quality to inform future policy. Furthermore, EPA allows reporters to update the total count of pneumatic devices based on changes in the system beyond year three of reporting. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1298-36

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Section 98.236(c)(7) & (8): There is no need to track well completions and workovers based on

whether a well is “conventional” or “unconventional.” IPAMS requests that EPA remove the sub-bullets (i) and (ii) from both paragraphs.

Response: EPA does not agree that tracking is unnecessary for whether a well completion or workover is unconventional or conventional (akin to with or without hydraulic fracturing). The emissions from well completions or workovers with hydraulic fractures (which is a feature of most unconventional wells) is much higher than emissions from well completion or workover without hydraulic fractures (which is a feature of most conventional wells). Please see chapter 4 and Appendix B of the TSD to today’s final rule for further details.

VOLUME 2: SELECTION OF REPORTING THRESHOLDS, GREENHOUSE GASES AND DE MINIMIS PROVISIONS

2.0 SELECTION OF REPORTING THRESHOLDS, GREENHOUSE GASES AND DE MINIMIS PROVISIONS

No comments received.

2.1 SELECTION OF GREENHOUSE GASES TO REPORT

Comment Number: EPA-HQ-OAR-2009-0923-0582-12

Organization: Western Climate Initiative (WCI)

Commenter: Michael Gibbs

Comment Excerpt Text:

Field gas combustion emissions should be reported;

Response: General stationary fuel combustion sources are to report emissions under subpart C, as specified in Section 98.232(k), while onshore production and natural gas distribution will report both portable and stationary combustion emissions sources, including field gas combustion emissions under subpart W as specified in Sections 98.232(c) and 98.232(i)

Comment Number: EPA-HQ-OAR-2009-0923-0582-18

Organization: Western Climate Initiative (WCI)

Commenter: Michael Gibbs

Comment Excerpt Text:

WCI recommends that SECTION 98.232(k) be revised to read as follows:

(k) You must report the emissions of CO₂, CH₄, and N₂O from each stationary fuel combustion source. For stationary combustion sources that combust field gas, you must report under this subpart. For stationary combustion sources that combust fuels other than field gas, you must report under subpart C of this part (General Stationary Combustion Sources).

Response: EPA has considered this recommendation, and will require reporting all combustion emissions from onshore production and natural gas distribution sources under subpart W, including field gas from stationary and portable combustion sources beginning in 2011. Please see response to comment EPA-HQ-OAR-2009-0923-0582-12.

Comment Number: EPA-HQ-OAR-2009-0923-1018-21

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Part 98 Section 98.232 – GHGs to Report

In sub-sections (18) Hydrocarbon liquids dissolved CO₂ and (20) Produced water dissolved CO₂ CAPP was unable to determine what emissions EPA was trying to quantify by the inclusion of these source types. In the case of hydrocarbon liquids, any CO₂ still remaining dissolved in the liquid when custody is transferred to the transmission system would only be released when it is further refined. At the point of further refining the emissions associated with the liberated CO₂ would be the responsibility of the refiner. In the case of produced water, this source is typically re-injected into a designated disposal well where the CO₂ dissolved in produced water would remain dissolved and never be released to the atmosphere. Based on this information CAPP recommends the removal of these source types from the MRR and Sub-Part W.

98.232 (e):

In sub-section (7) CAPP recommends the EPA include compressor dry gas seals in this section.

98.232 (j):

CAPP recommends the addition of incinerator to 98.232 (j). This section would then read: “You must report the CO₂, CH₄, and N₂O emissions from each flare and incinerator.”

Response: EPA disagrees with deleting dissolved CO₂ in hydrocarbon liquids leaving an EOR facility. Please see response to comment EPA-HQ-OAR-2009-0923-1018-46. EPA has revised the rule and no longer requires the monitoring of CO₂ from produced water at onshore petroleum and natural gas production operations. Please see the response to EPA-HQ-OAR-2009-0923-1151-129.

EPA agrees that centrifugal compressor dry seals should be monitored and has clarified in today’s final rule that these emissions are covered under the source “centrifugal compressor venting”. Please see the response to EPA-HQ-OAR-2009-0923-1011-46.

EPA has determined that incinerators do not contribute large enough emissions in the petroleum and natural gas industry to justify reporting under any industry segment and therefore are not included in the final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1042-11

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment Excerpt Text:

General ConocoPhillips Comment

The rule should state that any source that recovers emissions, such as by routing an off-gas back to the process, re-injecting it back into the reservoir, or use as a fuel for another source, is excluded from reporting emissions. This includes equipment such as dehydrators, tanks, and acid

gas units that recover gas streams.

Response: EPA does not agree with the commenter. Recovery systems do not always function at 100 percent efficiency. Hence, EPA requires reporting of emissions from tanks and dehydrators even with any form of recovery with an adjustment to the emissions for the portion of actual recovery. As regards re-injection from AGR units, please see the response to EPA-HQ-OAR-2009-0923-0582-31.

Comment Number: EPA-HQ-OAR-2009-0923-1042-12

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment Excerpt Text:

§98.232(c)(9) Gathering Pipeline Fugitives:

ConocoPhillips Comment:

§98.232(c)(9) and Table W-1 requires, for gathering pipelines in gas service, the quantification of fugitive emissions. The emission factor is in terms of scf/hour/mile. We believe this category is neither intended nor accurate for oil production gathering pipelines where the fluid is three-phase (oil, water, gas) and the pipelines are entirely welded between the well site and the processing facility. Since fugitives have to be quantified at the well site and in the processing facility pursuant to §98.233(r), we believe use of this emission factor will significantly overstate the emissions – i.e., there are none between the well site and the processing facilities. We request that EPA clarify that gathering pipeline fugitives do not have to be quantified for oil production facilities (or for facilities with nothing but welded pipe between the well site and the processing facility) in the final rule.

Response: Today’s final rule does not include gathering lines and boosting stations. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1080-35

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Aka recommends that the same GHGs and sources reported by processing plants under §98.232(d) be reported by gathering compression facilities.

Response: Today’s final rule does not include gathering lines and boosting stations. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1167-14

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Table 2 presents the emission source estimates from largest to smallest. The onshore production Subpart W sources and affected combustion sources are included. For each emission source, the estimated GHG emissions (tonne CO₂e), the source's percentage of the total onshore production GHG inventory, and the cumulative percent of inventory at that source (i.e. percentage based sum of emissions from that source and all larger sources) are presented. The emissions data show:

- Approximately 81 % of the estimated GHG emissions are attributable to the following eight sources:
- * Well Venting for Liquids Unloading;
- * Associated Gas Venting and Flaring;
- * Gas-Fired Reciprocating IC Engines (Combustion);
- * External Combustion: Heaters, Boilers (Combustion);
- * Gas Well Venting During Unconventional Well Completions;
- * Natural Gas Pneumatic Bleed Devices (High or Continuous);
- * Portable Combustion Sources (Drilling Rigs); and
- * Natural Gas Pneumatic Bleed Devices (Low).

Table 2. Estimated 2006 US GHG Inventory for MRR Subpart W and Subpart C Onshore Petroleum and Natural Gas Production Emission Sources.

Emission Source	CO2e tonne/yr)	% of Inv	Cumm %	Notes
Well Venting for Liquids Unloading [98.233(f)]	48,000,000	24%	24%	
Associated Gas Venting and Flaring [§98.233(m)]	24,000,000	12%	36%	
Gas-Fired Reciprocating IC Engines (Combustion)	22,000,000	11%	48%	
External Combustion: Heaters, boilers	16,000,000	8.4%	56%	
Gas Well Venting During Unconventional Well Completions [98.233(g)]	16,000,000	8.0%	64%	
Natural Gas Pneumatic Bleed Devices (High or Continuous) [98.233(a)]	13,000,000	6.9%	71%	
Portable Combustion Sources (Drill Rigs) [§98.233(z)]	13,000,000	6.6%	77%	
Natural Gas Pneumatic Bleed Devices (Low) [98.233(b)]	7,700,000	3.9%	81%	
Gas Well Venting During Unconventional Well Workers [98.233(g)]	7,000,000	3.6%	85%	
Dehydrator (glycol) Vent stacks [98.233(e)]	6,100,000	3.1%	88%	
Components [§98.233(r)]	6,000,000	3.0%	91%	
Produced Water Dissolved CO2 [§98.233(y)]	5,400,000	2.7%	94%	A
Production Storage Tanks [98.233(j)]	4,400,000	2.2%	96%	
Gathering Pipeline Fugitives [§98.233(r)]	3,066,000	1.6%	98%	
Reciprocating Compressor Rod Packing Vents (Blowdown Leak & Blowdown Vent (Unit Isolation Valve Leak) [§98.233(p)]	1,423,000	0.7%	98%	
Coal Bed Methane (CBM) Produced Water Emissions [§98.233(r)]	1,400,000	0.7%	99%	
Natural Gas driven pneumatic pumps [98.233(c)]	1,100,000	0.6%	100%	
Centrifugal Compressor Wet Seal Oil Degassing [§98.233(o)]	190,000	0.1%	100%	
Acid Gas Removal (AGR) Vent stacks [98.233(d)]	150,000	0.1%	100%	
Gas Well Venting - Conventional Well Completions [98.233(h)]	130,000	0.1%	100%	
Dehydrator (Desiccant) Vent stacks [98.233(e)]	120,000	0.1%	100%	
Hydrocarbon Liquids Dissolved CO2 [§98.233(x)]	8,700	0.0%	100%	
Gas Well Venting - Conventional Well Workovers [98.233(h)]	6,700	0.0%	100%	
EOR Injection Pump Blowdown [§98.233(w)]	-	<0.1%	100%	B
Well Testing Venting and Flaring [§98.233(l)]	0	0.0%	100%	C
Flare Stacks [§98.233(n)]	-	-	100%	D
TOTAL	200,000,000	100.0%		

A. These emissions could be estimated by simulations of produced water tank emissions by E&P Tanks (as applicable) or other process simulators (e.g. HYSIS) using water samples collected for storage tanks.

B. Based on docket data, 500,000 pumps would be needed to account for 0.1% of sector GHG emissions.

C. The majority of well tests are conducted while the wells are in operation and do not require flaring. Other well tests would be included in well completion and well workover estimates.

D. Flare emission estimates included in other emission source specific estimates.

- Sixteen sources contribute less than 20 percent of the overall estimated GHG emissions inventory. These sources increase the regulatory burden and greatly add to the cost as shown in Table 1.

Table 1. Estimated Noble Energy Cost to Comply with MRR Subpart W and Subpart C for Onshore Petroleum and Natural Gas Production Emission Sources.

Emission Source	% of US Inv. ^A	NE Costs (\$/tonne CO ₂ e) ^B		Notes
		Year 1	Year 2+	
Well Venting for Liquids Unloading [98.233(f)]	24%	\$11.00	\$9.00	C
Associated Gas Venting and Flaring [§98.233(m)]	12%	\$2.00	\$1.70	
Gas Well Venting During Unconventional Well Completions and Workovers [98.233(g)]	12%	\$1.20	\$0.51	
Gas-Fired Reciprocating IC Engines (Combustion)	11%	\$2.90	\$2.50	
External Combustion: Heaters, boilers	8.4%	\$3.70	\$2.10	D
Natural Gas Pneumatic Bleed Devices (High or Continuous) [98.233(a)]	6.9%	\$1.30	\$0.19	
Portable Combustion Sources (Drill Rigs) [§98.233(z)]	6.6%	ND	ND	
Natural Gas Pneumatic Bleed Devices (Low) [98.233(b)]	3.9%	\$2.60	\$0.37	
Dehydrator (glycol) Vent stacks [98.233(e)]	3.1%	\$12.00	\$10.00	
Components [§98.233(r)]	3.0%	\$17.00	\$2.401	
Produced Water Dissolved CO ₂ [§98.233(y)]	2.7%	\$21.00	\$18.00	E
Production Storage Tanks [98.233(j)]	2.2%	\$18.00	\$16.00	
Gathering Pipeline Fugitives [§98.233(r)]	1.6%	\$46.00	\$6.60	
Reciprocating Compressor Rod Packing Vents (Blowdown Leak & Blowdown Vent (Unit Isolation Valve Leak) [§98.233(p)]	0.7%	\$43.00	\$24.00	
Coal Bed Methane (CBM) Produced Water Emissions [§98.233(r)]	0.7%	-	-	F
Natural Gas driven pneumatic pumps [98.233(c)]	0.6%	\$1.50	\$0.54	
Centrifugal Compressor Wet Seal Oil Degassing Vent [§98.233(o)]	0.1%	ND	ND	
Acid Gas Removal (AGR) Vent stacks [98.233(d)]	0.1%	\$49.00	\$7.40	
Gas Well Venting During Conventional Well Completions and Workovers [98.233(h)]	0.1%	ND	ND	
Dehydrator (Desiccant) Vent stacks [98.233(e)]	0.1%	ND	ND	
Hydrocarbon Liquids Dissolved CO ₂ [§98.233(x)]	0.0%	\$38,000.00	\$33,000.00	
EOR Injection Pump Blowdown [§98.233(w)]	0.0%	ND	ND	G
Well Testing Venting and Flaring [§98.233(l)]	0.0%	NA	NA	H
Flare Stacks [§98.233(n)]	0.0%	NA	NA	I
Gas Composition [§98.233(u)]		NA	NA	J
TOTAL	100.0%	\$8.50	\$5.90	

ND – data not available

NA – not applicable

* Of these sixteen “bottom 20%” emission sources, eight sources have estimated emissions of approximately 0.1% of the inventory or less. Even if these estimates are an order of magnitude low, each emission source would still contribute approximately 1% or less to the inventory and it is recommended that these be acknowledged as insignificant sources and excluded from

reporting for onshore petroleum and natural gas production:

- > Centrifugal Compressor Wet Seal Oil Degassing Vents. Centrifugal compressors are not frequently employed for oil and gas production because reciprocating compressors have partial load operating advantages. Noble does not own or operate centrifugal compressors and Noble is not aware of any centrifugal compressors used in onshore oil and natural gas production. In addition, the prevalence and use of wet seals for centrifugal compressors have steadily decreased since wet seals were identified as a gas emission source; thus, it is expected that the few centrifugal compressors used for onshore production would primarily be equipped with dry seals;
- > Acid Gas Removal (AGR) Vent Stacks. Acid gas removal is predominately performed in the gas processing segment and AGRs are infrequently employed during production;
- > Gas Well Venting During Conventional Well Completions. Data presented in the TSD indicate that vented gas emissions from “conventional” well completions are orders of magnitude smaller than from “unconventional” well completions;
- > Dehydrator (Desiccant) Vent stacks. EPA Natural GasStar data³³ show emission from desiccant dehydrators to be less than 2% of glycol dehydrator emissions and this is a very small emission source;
- > Hydrocarbon Liquids Dissolved CO₂. Oil that has flashed in an atmospheric pressure storage tank would be expected to retain minimal amounts of gaseous compounds such as CO₂. The API Compendium notes that “once live crude reaches atmospheric pressure and the volatile CH₄/CO₂ has flashed off, the crude is considered “weathered” and the crude oil vapors contain very little, if any, CH₄ or CO₂.”
- > Gas Well Venting During Conventional Well Workovers. Data presented in the TSD indicate that vented gas emissions from “conventional” well workovers are orders of magnitude smaller than from “unconventional” well workovers;
- > EOR CO₂ Injection Pump Blowdowns. Blowdown event volumes and frequency presented in docket documents indicate that tens of millions of these pumps would be needed for this to be a significant emission source; and
- > Well Testing Venting and Flaring. The majority of well tests are conducted while the wells are in operation and do not require flaring. Emissions from other well tests would be included in well completion and well workover estimates.

These sources should be eliminated from 98.232 (c) (1) through (21) and from reporting requirements in Subpart W. If EPA elects to retain these sources, proper cost impact analysis and justification should be provided to support the cost effectiveness and data end use objectives for the GHG inventory.

For the remaining nine “bottom 20%” emission sources - Gas Well Venting During Unconventional Well Completions, Dehydrator (glycol) Vent stacks, Components, Produced Water Dissolved CO₂, Production Storage Tanks, Gathering Pipeline Fugitives, Reciprocating Compressor Rod Packing Vents (Blowdown Leak & Blowdown Vent (Unit Isolation Valve Leak)), Coal Bed Methane (CBM) Produced Water Emissions, and Natural Gas Driven Pneumatic Pumps - additional emission data collection and analysis to refine the emission estimates and better evaluate their potential significance (i.e. in the highest 80%) would be

³³ "Replacing Glycol Dehydrators with Desiccant Dehydrators" http://www.epa.gov/gasstar/documents/ll_desde.pdf.

recommended.

In the TSD, EPA primarily references data and information from the U.S. GHG Inventory and EPA Natural GasStar studies to estimate emissions from and determine the significance of individual emission sources. Much of the U.S. GHG Inventory is based on emission factors developed from production equipment and operations in the early 1990's (i.e. the GRI/EPA Study³⁴) and the GasStar data are often "data of opportunity" rather than from a representative sampling of industry sources. Thus, some emission estimates may not represent current equipment and operations. Examples of emission reductions since the GRI/EPA Study include LDAR programs to reduce fugitive emissions, flash tanks and combustion controls for glycol dehydrators, and other Gas STAR implemented recommended technologies and practices.

It is recommended that EPA investigate additional, more recent sources of GHG emissions data and refine the emission source estimates presented in the TSD (i.e. refine Table 2). Updated, more representative data will allow a better evaluation of the potential contribution of all the individual emission sources and determine which sources are most likely insignificant, significant (i.e. in the top 80% largest sources), and sources where additional data would be needed to better define contribution to the overall inventory.

Potential sources of additional, more recent GHG emission data include, but are not limited to, the Western Regional Air Partnership (WRAP), data collected for State Implementation Plans, state agencies, equipment and reagent sales (e.g. desiccants sales to industry by largest suppliers), and GHG reporting programs.

If this analysis is not completed, then Noble recommends that the Noble U.S. GHG Inventory presented in Table 2 be used to identify insignificant sources; thus, the eight sources discussed above would be considered insignificant and removed from the rule. In addition, it is further recommended that the remaining emission sources estimated to contribute less than 2% of the GHG inventory be acknowledged as insignificant sources and excluded from reporting for onshore petroleum and natural gas production:

- Gathering Pipeline Fugitives;
- Reciprocating Compressor Rod Packing Vents (Blowdown Leak & Blowdown Vent (Unit Isolation Valve Leak);
- Coal Bed Methane (CBM) Produced Water Emissions; and
- Natural Gas Driven Pneumatic Pumps.

Response: EPA disagrees with the analysis provided by the commenter on the decision process. The decision process used by EPA as a guidance and provided in Appendix A of the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923) does not include combustion emissions to make the determination on whether a particular source is in the top 80 percent emissions for the segment; only process emissions are considered. By adding the combustion emissions, the commenter has skewed the analysis to take several important sources out of the 80 percent reporting source category. EPA in today's final rule has

³⁴ GRI/EPA Reports, "Methane Emissions from the Natural Gas Industry", June 1996 (EPA -600/R-96-080).

set equipment thresholds for several sources, namely small dehydrators less than 0.4 mmscfd, production storage tank emissions from sources less than 10 barrels per day. In addition, the entire gas gathering and boosting segment of the industry, and coal bed methane produced water emissions are not included in today's final rule. Please see Section II of the preamble for further information. EPA has greatly simplified the GHG calculation methodologies for several small or uncertain sources, such as: equipment leaks (now based on factors from major equipment counts), process emissions from reciprocating and centrifugal compressors in onshore petroleum and natural gas production (now based on count and emission factor), pneumatic pumps (now based on count and emission factor), and well workovers without hydraulic fracturing (now based on count and factor). Also, external combustion equal to or less than 5 mmBtu/hr require reporting of a count by equipment type only. . It is important to understand that, to inform future policy, activity data is often as useful as emissions estimates. (see section 4.c. of the TSD to today's final rule). On this basis, while today's final rule greatly simplifies the reporting requirements for many smaller sources, EPA disagrees with Noble's comment to exclude eight source types – centrifugal compressor wet seal oil degassing vents, AGR vent stacks, gas well venting during conventional well completions (gas well venting from well completions without hydraulic fracturing in today's final rule), dehydrator vent stacks, hydrocarbon liquids dissolved CO₂, gas well venting during conventional well workovers (gas well venting from workovers without hydraulic fracturing in today's final rule), and EOR CO₂ injection pump blowdowns. EPA needs to know if some of these sources are present in onshore production (AGRs, centrifugal compressors), and needs a better accounting of the number of some sources (well completions and workovers without hydraulic fracturing involving venting or flaring of gas). Note, if a well test, as the commenter suggests, is conducted without any venting or flaring, then there is nothing to report for that test: this source requires reporting of gas vented or flared. As the commenter suggests, if the majority of these tests are conducted as part of well completions and workovers then these will be reported under well completions and workovers, respectively, and there is no need for duplicative reporting.

EPA disagrees with the comment on costs. Please see response to comment EPA-HQ-OAR-2009-0923-1167-11. EPA has provided justification, and conducted a detailed cost impact analysis for all sources in the onshore production sector. This information can be found in the Economic Impact Analysis for the Mandatory Reporting of Greenhouse Gas Emissions under subpart W proposed rule (EPA-HQ-OAR-2009-0923). For a complete list of programs and guidance documents that EPA had evaluated on GHG emissions monitoring and reporting, please see Table 2: Summary of Program and Guidance Documents on GHG Emissions Monitoring and Reporting of the Greenhouse Gas Emissions from the Petroleum and Natural Gas Industry: Background TSD (EPA-HQ-OAR-2009-0923-0027).

Comment Number: EPA-HQ-OAR-2009-0923-3541-4
Organization: Sempra LNG
Commenter: David M. Cobb

Comment Excerpt Text:

The inclusion of pump seals should be removed from 98.232(h)(4). The majority of pumps at LNG import facilities are hermetically sealed and therefore are not open to the atmosphere, either vertical turbine multistage pumps installed in pump wells submerged within the LNG tank, or pumps for which the motor and the pump are fully enclosed and submerged in LNG in the pump can. These pump types do not require pump shaft seals and are not open to the atmosphere, so they generate no fugitive emissions. For that small number of facilities utilizing LNG pumps with external motors not enclosed within the pump can, and with pump shaft sealing, the seals are closely monitored, and if leakage were to occur, the pump would be shut down and repairs to the seal performed. Due to the level of redundancy of systems and equipment, LNG facilities are generally equipped with a number of spare pumps, allowing shutdown of any pump for maintenance, while continuing facility operations without interruption .

Response: EPA is aware that there are different pump technologies deployed by LNG facilities. If LNG facilities are using low emission technologies and/or implementing emission reduction practices (such as closely monitoring pump seals as the commenter noted above), then those should be reflected in the emission levels reported to EPA. However, the use of low emission pump technologies or emission reduction practices are not known to be ubiquitous in the LNG industry. Therefore the collection of GHG data from the LNG sector is important in understanding differentiated emissions levels, which is necessary to informing future policy.

Comment Number: EPA-HQ-OAR-2009-0923-1039-5

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment Excerpt Text:

Section 98.232 Segment-Specific Source Reporting Should Be Clarified

§98.232(b)–(i) identify the emission sources to report for each of the eight industry segments. These are the primary sources identified by EPA for each segment. INGAA recommends focusing on sources that comprise the majority of emissions, and the current Proposed Rule is more focused on primary emission sources than the 2009 version of Subpart W. INGAA supports this approach. INGAA’s understanding is that only those sources listed in the applicable §98.232 subsection that applies to a particular segment are to be reported for a facility – i.e., the source list is specifically defined and limited to those sources in the §98.232 subsection for that segment.

A facility’s segment should be based on the primary facility function. For example, for natural gas transmission compression, the seven source types listed in §98.232(e) are to be reported under Subpart W. If another source type listed for another segment is at a compressor station (e.g., a dehydrator), reporting and other associated requirements for that source would not be required.

To facilitate implementation and to reduce ambiguity, INGAA recommends revisions to §98.232 to: (1) clarify identification of an industry segment for a particular facility; and (2) clearly indicate the segment-specific limitation in sources to report.

Response: With regards to segment-specific sources to report, please refer back to Section 98.232, “GHGs to report,” of today’s final rule, which contains the complete list of source types to report for each industry segment. EPA requires that facilities with multiple functions report under the industry segment for which the majority of emissions occur. Please see the response to EPA-HQ-OAR-2009-0923-1024-14 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1039-6

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment Excerpt Text:

INGAA Recommends Relying on Primary NAICS Code to Identify Segment

Natural gas industry operations include an array of processes, and equipment/source types prevalent in a particular segment that may also be located at facilities in other segments. INGAA understands that EPA’s intent is that a particular facility would only report emissions from the corresponding source types listed for the applicable segment in 98.232. EPA has indicated it plans to add a “frequently asked question” to its on-line support material to address this issue. Without additional clarity, INGAA is concerned that implementation questions could arise. Thus, it is important that the Final Rule more clearly reflects EPA’s intent and also provides a means to document the appropriate segment for a facility.

To identify the segment that applies to a facility, INGAA recommends that EPA initially rely on the primary six digit NAICS code. As needed, additional information can be provided to further refine the segment. For example, NAICS code 486210 applies to “pipeline transportation of natural gas”. Since there is not a separate code for storage, this code should apply for both transmission compressor stations and natural gas storage facilities. To provide additional differentiation beyond the NAICS, operators should clarify additional segmentation in the GHG Monitoring Plan and identify the segment that applies under §98.232 in the annual report. This approach would be supported by recent General Provision proposed amendments to require NAICS reporting.

On April 12, 2010, EPA proposed amendments to 40 CFR Part 98, Subpart A of the Mandatory Reporting Rule at 75 FR 18455 – 18468. The proposed amendments include the requirement for reporters to provide, “...their primary and all other applicable North American Industry Classification System (NAICS) code(s)”. [75 FR 18455] INGAA understands that this requirement is not yet final, but with expectations that NAICS code reporting will be required, INGAA recommends relying on the NAICS code to identify the industry segment under §98.232. Since NAICS code reporting will likely be instituted, this information can also be used to clarify the applicable industry segment under §98.232. Some NAICS codes apply to multiple segments within §98.232, and in such cases additional clarification can be provided in the GHG Monitoring Plan.

To address this issue presuming the proposed General Provision amendments are finalized, INGAA recommends revisions to §98.232(a) to indicate the following:

“(a) You must report CO₂ and CH₄ emissions from each industry segment specified in paragraph (b) through (i) of this section.

(i) The industry segment specified in paragraph (b) through (i) shall be based on the primary NAICS code reported under §98.3(c)(10)(i).

(ii) When the NAICS code includes multiple industry segments from paragraph (b) through (i) of this section, the basis and determination for the industry segment shall be documented in the facility GHG Monitoring Plan required under §98.3(g)(5).”

This language, or similar text, should be added to section §98.232 to clarify the source segment for a particular facility. If the Subpart A amendments are not finalized for reference in the Final Rule, the language provided in (a)(i) above could be revised to delete reference to Subpart A, but still provide similar criteria.

Response: EPA disagrees with the use of NAICS codes. Please see response to comment EPA-HQ-OAR-2009-0923-1024-14 .

Comment Number: EPA-HQ-OAR-2009-0923-1039-7

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment Excerpt Text:

Additional INGAA Recommended Clarifications to §98.232

INGAA recommends additional clarifications in the rule text to clarify rule intent. Minor revisions can add considerable clarification, and INGAA recommends the following revision to §98.232(a):

“(a) You must report CO₂ and CH₄ emissions from each industry segment specified in paragraph (b) through (i) of this section, and only those sources specified for the industry segment shall be reported for an applicable facility under this subpart.”

This proposed revision is in addition to the text proposed in Comment III.A above, but is provided separately to avoid confusion. If EPA elects not to include such text in the Final Rule, then the Final Rule preamble should, at a minimum, include a discussion to clearly indicate the requirement – i.e., the preamble should indicate that an applicable facility would only report emissions from the emission sources listed for its corresponding industry segment in §98.232. For example, a natural gas transmission compressor station would only report emissions for the seven sources identified in §98.232(e) under Subpart W.

In addition, further clarification is required regarding §98.232(j) which addresses reporting of flare emissions. INGAA understands that flare emissions reporting is not required for natural gas transmission or storage because it is not included in the segment-specific list. However, the subsection hierarchy in §98.232 causes confusion, where §98.232(j) through (l) are separate from

the criteria in §98.232(b) through (i). Paragraph (j) could be perceived as a stand-alone requirement, similar to criteria in (k) and (l), which indicate Subpart C combustion emissions and Subpart PP emissions must be reported. Since paragraph (j) has the same hierarchy as (k) and (l), it causes confusion. Thus, §98.232(j) should be clarified to indicate the following:

“(j) Where flare emissions reporting is required in paragraph (b) through (i) of this section, you must report the CO₂, CH₄, and N₂O emissions from each flare.

If an alternative interpretation is intended – i.e., flares reporting is applicable to all industry segments specified in paragraph (b) through (i), then EPA should explain the basis for this decision.

Response: With regard to sources to report for each industry segment, please see response to comment EPA-HQ-OAR-2009-0923-1039-5. In response to commenters’ concern about the ambiguity of which industry segment is required to report flare emissions, today’s final rule has been clarified for GHGs to report in Section 98.232(j) to state that only the flare emissions from applicable industry segments must be reported.

Comment Number: EPA-HQ-OAR-2009-0923-1042-13

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment Excerpt Text:

§98.232(j): You must report the CO₂, CH₄, and N₂O emissions from each flare.

This paragraph appears to require reporting emission from flares for ALL industry segment defined under Subpart W. To confuse matters, flares are specifically limited as a source for “onshore natural gas processing” (§98.232(d)) or used for control of another listed source under §98.232(b) through (i). Specifically identifying flare stacks in the applicable segment is sufficient and reduces any confusion. Therefore, ConocoPhillips requests the removal of this paragraph from § 98.232.

Response: Please see the response to comment EPA-HQ-OAR-2009-0923-1039-7.

Comment Number: EPA-HQ-OAR-2009-0923-1151-26

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

Section 98.232 GHG’s to report. Section 98.232(j) should be removed from the regulations. As proposed, this paragraph indicates ALL flares for all segments have to report CO₂, CH₄, and N₂O. Specifically identifying flare stacks in the applicable segment is sufficient and reduces any confusion.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1039-7.

Comment Number: EPA-HQ-OAR-2009-0923-1305-14

Organization: BP America, Inc.

Commenter: Karen St. John

Commenter Type: Industry - oil and gas

Comment Excerpt Text:

Section 98.232 GHG's to report

98.232(j) should be removed from the regulations. As proposed, this paragraph indicates ALL flares for all segments have to report CO₂, CH₄, and N₂O. Specifically identifying flare stacks in the applicable segment is sufficient and reduces any confusion.

Paragraph (k) requires reporters to report under subpart C the emissions of CO₂, CH₄, and N₂O from each stationary fuel combustion units by following the requirements of subpart C. Subpart C Section 98.30(b)(1) says the source category subject to Subpart C excludes portable equipment. 98.230(a)(2) says the onshore petroleum and natural gas production source category includes "...portable non-self-propelled equipment (including but not limited to well drilling and completion equipment, workover, equipment, gravity separation equipment, auxiliary nontransportation- related equipment, and leased, rented or contracted equipment..." EPA should clarify if the source category definitions in 98.230 and in particular 98.230(a)(2) only apply to vented, fugitive and flare emissions reported under Subpart W or if the source category definitions in 98.230 also apply to combustion sources located at the petroleum and natural gas source category facilities. In other words for onshore petroleum and natural gas facilities which of the following 2 scenarios is the correct interpretation: (1) are stationary, portable, rented, contracted and leased vented and fugitive emissions reported under Subpart W and stationary, portable, rented, contracted and leased combustion source emissions reported under Subpart C because 98.230(a)(2) says portable, rented, contracted and leased equipment is part of the onshore production facility; OR (2) are stationary, portable, rented, contracted and leased vented and fugitive emissions reported under Subpart W because 98.230(a)(2) says portable, rented, contracted and leased equipment is part of the onshore production facility and only stationary combustion source emissions (not portable, rented, contracted and leased combustion source emissions) are reported under Subpart C because 98.232(k) says to report combustion emissions following the requirements of Subpart C which includes an exclusion for portable combustion emissions? EPA should significantly clarify the interaction between Subpart W and Subpart C.

Response: Please see the response to comment EPA-HQ-OAR-2009-0923-1039-7 for discussion on GHG's to report under flare emissions. Onshore production must report emissions from each portable and stationary fuel combustion source under subpart W. Please see Section II.F of the preamble. The source category definitions in Section 98.230 apply to combustion emissions, equipment leaks, vented and flare emissions. You must report combined emissions and follow the requirements of Section 98.2, for facilities that contain any source category for which calculation methods are provided. In the final rule EPA has revised the term facility in 98.238 for the purposes of subpart W, and separated it from the Subpart A requirements with respect to natural gas distribution and onshore petroleum and natural gas production for clarity. Please see

the preamble Section II.D.

Comment Number: EPA-HQ-OAR-2009-0923-1022-1

Organization :

Commenter: Michael Leonard

Comment Excerpt Text:

(98.232) Regarding GHGs to report, stationary combustion emissions from portable equipment are not listed as a source type under any type of facility. We request clarification whether or not stationary combustion emissions from portable equipment would be required to report under Subpart W.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-1305-14.

2.2 SELECTION OF THRESHOLDS

Comment Number: EMAIL-0011-1 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923)

Organization: Swanner Consulting & Reporting, LLC

Commenter: Robin Swanner

Comment Excerpt Text:

I have read the rules concerning Oil & Gas Operators and participated in the webinar and am still trying to decide if Oil & Gas operators are required to test and/or report to the EPA. I understand that there is a threshold of the 25,000 co₂e, so does the EPA recommend using the optical emission detection for fugitive gases in addition to the calculation to determine what the threshold would be on a yearly basis? If the operator determines they are under the threshold then no report would be due, but they would have the information if EPA requests it.

Response: Facilities have the responsibility of determining their applicability to the rule based on the general provisions outlined in Section 98.2. Please see The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98) preamble Section II.P, where EPA addressed applicability determination broadly. EPA plans to develop screening tools to help facilities in each segment of the petroleum and natural gas industry determine whether they would be subject to reporting. For further details about the screening tools, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-0051-1

Organization:

Commenter: Z. Carpenter

Comment Excerpt Text:

I am in full support of the proposed rule to subject owners or operators of petroleum and natural gas facilities with emissions equal to or greater than 25,000 metric tons of carbon dioxide per year to mandatory reporting. However, I think the proposed rule does not go far enough, and that 10,000 metric tons is a better threshold.

The most compelling scientific research regarding carbon dioxide emissions tells us that 350 parts per million is “the safe upper limit for CO₂ in our atmosphere.” www.350.org (“Accelerating arctic warming and other early climate impacts have led scientists to conclude that we are already above the safe zone at our current 390 ppm, and that unless we are able to rapidly return to below 350 ppm this century, we risk reaching tipping points and irreversible impacts such as the melting of the Greenland ice sheet and major methane releases from increased permafrost melt.”), see also IPCC 4th Assessment Report, 2007.

The EPA, as well as Congress and our nation’s President, have made it a priority goal to reduce Greenhouse Gas emissions. I think that in order to “rapidly return to below 350 ppm this century” the EPA must act to regulate more Greenhouse Gas producing industries across the board. However, the EPA should target bigger industries first, because they have the resources to fund the technological innovation needed to make reducing Greenhouse Gas emissions a cost-effective option for smaller industries. While these smaller industries are in a less advantageous position to develop this technology, they eventually need to lower their emissions for us to get to 350ppm. The EPA’s own fact sheet regarding the recently announced tailoring rule noted that “[e]missions from small farms, restaurants, and all but the very largest commercial facilities will not be covered by these programs at this time.” (emphasis added). Final Rule: Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule. Evidently, it is the EPA’s own ambition to expand Greenhouse Gas regulation to these small industries as well as the large petroleum and natural gas facilities that will be impacted by this proposed rule.

So why, then, not adjust the threshold to 10,000? The 25,000 ton threshold is under inclusive of thousands of large CO₂ producing facilities in the petroleum and natural gas industry, an industry that is well situated to bear the burden of spearheading the effort of American business to lower Greenhouse Gas emissions. Further, lowering the threshold level for large petroleum and natural gas facilities would put smaller industries on notice that they will soon be subject to Greenhouse Gas regulation as well, because it would express a more aggressive agency position on CO₂ regulation. This indirect notice effect would make the agency’s job easier when it came time to expand regulation further. It is my impression that this is essentially what motivated the additional rules in the first place, I am simply suggesting that the agency go further than it has

Response: EPA disagrees with the comment on the 10,000 metric ton CO₂e threshold. Please see The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98) preamble Section II.E, the Technical Support Document (TSD) and the Economic Impact Analysis (EIA) for today’s final rule found in docket EPA-HQ-OAR-2009-0923. EPA disagrees that the rule is under-inclusive of facilities, as EPA estimates that the rule will cover 85 percent of the total GHG emissions from the U.S. petroleum and natural gas industry with about 2,800 facilities reporting. Please see the EIA Section 5, for more information.

Comment Number: EPA-HQ-OAR-2009-0923-0582-43

Organization: Western Climate Initiative (WCI)

Commenter: Michael Gibbs

Comment Excerpt Text:

Reporting Facilities: The WCI supports the EPA's proposed approach of defining the reporting facilities for on-shore and off-shore production and natural gas processing for determining compliance obligations against the 25,000 tonne threshold. The approach of separating consolidated onshore and offshore production facilities from natural gas processing plants and downstream operations meets the needs of the WCI so long as the option is present for a lower state level reporting threshold as discussed by the Integrated Project Team.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-0051-1.

Comment Number: EPA-HQ-OAR-2009-0923-0837-3

Organization: Canadian Gas Association

Commenter: Michael Cleland

Comment Excerpt Text:

We note from information in the preamble that only one in ten LDCs is likely to trigger the 25,000 tCO₂e reporting threshold; however, there is still an onus on facilities under the threshold to determine that they do not report. This is a potentially costly and onerous effort for LDCs below the reporting threshold. We would encourage EPA to provide a straightforward means for these smaller LDCs to confirm exclusion from reporting. For example, some level of miles of distribution main and/or number of gate stations could be set as the starting threshold for reporting.

Response: EPA agrees that approximately one in ten LDCs will report, as EPA estimates that 143 LDCs, of approximately 1,427 LDCs, will be subject to subpart W using a facility threshold of 25,000 tpy CO₂e. Please see the EIA in EPA-HQ-OAR-2009-0923. EPA disagrees that the initial applicability determination process is burdensome, please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) Section II.P EPA has estimated the burden for reporting determination made by non-reporters and it is included in the EIA. EPA plans to develop voluntary screening tools to assist facilities in determining whether they are subject to reporting. Please Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-0955-1

Organization: American Public Gas Association (APGA)

Commenter: Bert Kalisch

Comment Excerpt Text:

APGA supports applying the 25,000 metric ton threshold to fugitive emissions, particularly for LDCs covered under proposed subpart W.

Of the approximately 1,000 public LDCs in the United States, over half have fewer than 5,000 customers, annual revenues of less than \$1 million and 5 or fewer employees. For these utilities the administrative burden of complying with this regulation would be significant. APGA commends EPA for proposing to limit reporting to those utilities whose estimated fugitive emissions and emissions of other greenhouse gases exceed 25,000 metric tons CO₂ equivalent per year.

The limitation is particularly appropriate for LDCs covered under proposed subpart W. APGA's analysis using annual report data submitted by 1,372 LDC operators to the Pipeline and Hazardous Materials Safety Administration ("PHMSA") for calendar year 2007 finds that the total estimated emissions using EPA's emission factors and the count of mains and services were 14,662,873 metric tons CO₂ equivalent per year. For the 97 operators whose estimated emissions were over 25,000 metric tons, the total estimated emissions were 12,918,715 metric tons per year. By applying the 25,000 metric ton threshold, about 90 percent of the estimated LDC emissions would be reported and at the same time EPA would eliminate the burden on the 93 percent of LDC operators whose operations are very small and for which reporting would be a substantial burden. In that regard, the 90 percent of the emissions from LDCs that would still be captured by application of the threshold compares very favorably to the 83% of emissions that would be captured by application of the threshold to all categories covered under the Proposed Rule.

Thus, application of the 25,000 metric tons threshold is particularly warranted for LDCs covered under subpart W. In that regard, it is worth noting that because the PHMSA data on emissions is publicly available, EPA could easily use such PHMSA data rather than impose unnecessary burdens on small LDC operators by requiring these LDCs to report such data separately to EPA.

In sum, APGA supports the 25,000 metric ton CO₂ equivalent threshold, particularly for LDCs covered under subpart W, because application of the threshold would appropriately eliminate unduly burdensome requirements.

Response: EPA does not agree that the leak detection and repair requirements of the Department of Transportation meet the requirements to inform public policy regarding greenhouse gas emissions. For further details, please see rulemaking docket (EPA-HQ-OAR-2009-0923) under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements" and the response to EPA-HQ-OAR-2009-0923-1026-8.

Comment Number: EPA-HQ-OAR-2009-0923-1004-5

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

The agency can reduce the total number of wellheads and related facilities that are subject to reporting by increasing applicable emission thresholds, redefining the unit of reporting, or a

combination of these two approaches.

Response: See response to comment, EPA-HQ-OAR-2009-0923-0051-1 for a discussion of the alternatives of changing the emissions threshold. Furthermore, redefining units of reporting to something other than basin level has been evaluated by EPA, and EPA has determined that basin level reporting has the optimal balance of emissions coverage and cost burden (See Volume 2 on Selection of Reporting Thresholds, Greenhouses Gases, and De Minimis Provisions of the Response to Comment document which addresses a number of these questions). In addition, the Economic Impact Analysis of today's final rule, Section 5, also discusses the analysis of using a field level versus basin level for reporting.

Comment Number: EPA-HQ-OAR-2009-0923-1004-7

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

Devising a simple "screening" threshold that would allow wellheads that are of small size or throughput to be excluded from GHG emissions reporting;

Response: EPA disagrees with de minimis reporting. Please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) preamble Section II.K. Low production well data must be reported if said well is part of a facility over the threshold, but EPA has revised several methodologies including using emission factors for onshore production tanks with less than 10 barrels per day separator and well production throughput, please see response to comment EPA-HQ-OAR-2009-0923-1018-2. EPA will provide a screening tool for overall basin-level applicability determination. Please see Section II.F of the preamble to today's final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1005-5

Organization: Independent Petroleum Association of America

Commenter: Lee Fuller

Comment Excerpt Text:

American petroleum and natural gas production comes from approximately 933,000 wells – roughly 500,000 oil wells and 433,000 natural gas wells. These facilities are spread across 33 states. Offshore facilities would be within the scope of the reporting requirements. EPA estimates that 50 offshore facilities would be covered under the 25,000 tons/year threshold. If EPA were to expand the reporting requirements to onshore facilities, it is highly unlikely that any production well facility would meet the reporting threshold. For example, approximately 85 percent of oil wells and 74 percent of natural gas wells are marginal wells producing less than 15 barrels/day of oil and 90 mcf/day of natural gas, respectively. Most of these operations are owned by small businesses. None of them would exceed the reporting threshold individually.

Response: Please see Section II.D.1 of the preamble for onshore production segment and the reporting requirements. EPA disagrees with the commenter's comparison of onshore and offshore production facility definitions and the possible resultant reporting determinations. Please see the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923) for a discussion of facility definitions. With regards to the comment on marginal well operations and the reporting threshold, please see response to comment EPA-HQ-OAR-2009-0923-0053 -1.

Comment Number: EPA-HQ-OAR-2009-0923-1005-8

Organization: Independent Petroleum Association of America

Commenter: Lee Fuller

Comment Excerpt Text:

Reporting Threshold

We continue to endorse a 25,000 tons/year reporting threshold for a facility. However, we believe the onshore petroleum and natural gas production should be treated as other industries with a facility definition that is related to real operations. In this instance – consistent with other portions of the CAA – the well pad is an appropriate facility definition.

Response: EPA disagrees with the comment regarding onshore production facility definition, please see Section II of the preamble in today's final rule, and the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923). EPA disagrees with the comment regarding consistency with the CAA. Please see response to comments EPA-HQ-OAR-2009-0923-1044-1 and EPA-HQ-OAR-2009-0923-1174-5.

Comment Number: EPA-HQ-OAR-2009-0923-1015-11

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

There are several issues here: Does the 25,000 tonne threshold include all combustion equipment in the basin for production facilities?

Response: Yes for onshore production, portable and stationary combustion emissions must be included in the 25,000 MtCO_{2e} threshold determination. However, for external combustion sources with a rated heat input capacity equal to or less than 5 mmBtu/hr, reporters are only required to report the number and type of equipment and therefore, the emissions from these small sources will not be included in the threshold analysis. Yes for onshore production, portable and stationary combustion emissions must be included in the 25,000 MtCO_{2e} threshold determination. However, for external combustion sources with a rated heat input capacity equal to or less than 5 mmBtu/hr, reporters are only required to report the number and type of equipment and therefore, the emissions from these small sources will not be included in the

threshold analysis. In the final rule, EPA has clarified the For threshold determination for onshore production and distribution. Please see the preamble Section II.D.

Comment Number: EPA-HQ-OAR-2009-0923-1015-8

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

General Comments – Portable and Standby Equipment

EPA states, “For applying the threshold defined in 98.2(a)(2), you must include combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.” This requirement is unclear. Must it be the same piece of equipment (i.e., what if there are three different portable engines that together add up to >30 days)? It is important to note that equipment often moves from well site to well site, however, as written in the rule it appears that equipment must be tracked by basin. While it is common to track equipment by asset or business line, crossing basins will make this reporting requirement difficult to comply as it is information not currently tracked in this manner.

98.234(a) will require standby equipment to be included in annual leak detection which is overly burdensome: by nature, standby equipment is operated in short intervals, and is often operated in place of other equipment that would otherwise be emitting GHG emissions. Also, this requirement would force field personnel to make multiple trips to each wellhead each year to quantify emissions that are otherwise minimal.

Response: In today’s final rule EPA has removed the 30-day at wellhead clause to avoid practical issues with determining the time the portable equipment is at the wellhead. Please see response to comment EPA-HQ-OAR-2009-0923-1170-7. In regards to the comment on movement of portable equipment, EPA does not agree with the commenter. Typically, the operator will know where the portable equipment is located any given point in time. This is tracked as the commenter has pointed out by asset (or field operations). Usually, one basin will have multiple assets for an operator and determining the number of days the portable equipment was in the basin is simply a matter of adding the number of days the portable equipment was in each of the assets in that basin. In any case, the removal of 30 days requirement will make the tracking easier.

In regard to annual leak detection of compressors in standby mode, today’s final rule requires the use of emissions factors to estimate process emissions (vented and equipment leaks) from compressors in onshore production. Hence, the issue of standby compressors is not relevant for onshore production in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1016-27

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Clarify That Portable and Stationary Combustion Emissions Are Not Included in the Threshold Determination under Subpart W for Facilities Other Than Production

It is not clear how section 98.2(a)(2) in Subpart A relates to threshold determinations under Subpart W. Proposed section 98.231(a) describes the reporting threshold for Subpart W facilities as follows:

“You must report GHG emissions from ... natural gas systems if your facility as defined in §98.230 meets the requirements of §98.2(a)(2).

Section 98.2(a) sets out a facility threshold of 25,000 metric tons per year CO₂e “in combined emissions from stationary fuel combustion units, ... and all source categories listed in Table A-3 of Subpart A.” This may make sense for a traditional Clean Air Act “facility” with contiguous boundaries, where one could survey combustion sources within the fence line, but it makes no sense when applied to a larger distribution system under a reporting rule that is intended to estimate and report fugitive and vented emissions. Proposed section 98.230 would create an unusually expansive definition of facility for “Natural Gas Distribution” – encompassing many miles of distribution pipelines and metering and regulating stations that can stretch across an entire state. There could be many small pieces of combustion equipment along gas mains and at M&R stations scattered across a state. LDCs do not maintain inventories of these small combustion units, and the cost of obtaining a count of such small fuel combustion units would not be justified by the small amount of emissions involved. EPA should not require LDCs to develop an estimate of combustion emissions from such small sources either for threshold or reporting purposes.

Proposed section 98.231(b) states that “[f]or applying the threshold defined in §98.2(a)(2) [i.e. 25,000 metric tons per year CO₂e], you must include combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.” While the preamble explains that EPA is proposing to require portable and stationary fuel combustion emissions to be included in the threshold determination for onshore production facilities,³⁵ the proposed regulatory language is not clear. It could be interpreted to apply to wellheads at underground storage facilities as well as production wellheads.

The problem with including portable equipment in the determination whether an underground storage facility has triggered the 25,000 tpy threshold is the fact it is literally a moving target. For example, an operator may have a drilling rig on site for 6 months in 2008 but not in 2009. If

³⁵ 75 Fed. Reg. at 18619.

the drilling rig for that six month period caused the underground storage facility to “trigger” the threshold for reporting but it is a one-time occurrence, the operator is saddled with Subpart W reporting for a facility that triggered the threshold only because of this one time emission. It would also be a ‘logistical nightmare’ to track all contractor portable equipment and their run time and then calculate the emissions to determine whether the portable equipment emission cumulatively triggers the 25,000 tpy threshold over the course of a year.

AGA’s Suggested Revision: Accordingly, the provision should be clarified by revising the beginning of section 98.231 as follows: “For applying the threshold defined in §98.2(a)(2) to onshore production facilities, you must include combustion emissions from portable equipment....”

Response: EPA never intended portable combustion emissions monitoring for natural gas distribution or underground natural gas storage. In today’s final rule, EPA has clarified that portable combustion emissions are to be included in threshold determination and require reporting only from onshore production segments, as portable combustion are responsible for a large portion of onshore production emissions. Please see Section II.F of the preamble in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1018-12

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Pre-amble-page 54, "Although EPA is proposing an emissions threshold of 25,000 metric tonnes CO₂e for all segments of the petroleum and natural gas industry, EPA is taking comment on whether a 10,000 metric tonnes CO₂e threshold for onshore petroleum and natural gas production would be more appropriate." ·

- CAPP does not support the lowering of the facility threshold to 10,000 metric tomes CO₂e.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-0051-1.

Comment Number: EPA-HQ-OAR-2009-0923-1018-20

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Part 98 Section 98.231 – Threshold Reporting

98.231 (b)

“...must include combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a

reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.” ·

- CAPP understands that the EPA was attempting to reduce the burden on industry by placing a 30 day threshold for portable equipment, however in practice this only removes the calculation portion of the burden as all equipment and associated data would still have to be collected in case the annual 30 day threshold is met. If the EPA wishes to reduce the burden for portable equipment, CAPP recommends a portable equipment size de minimus be implemented, which would exclude the smaller heaters and generators.

- CAPP would also like to see consistency between all sectors and facility types with respect to how portable equipment is handled.

Response: The treatment of portable equipment is clarified in Section II.F of the preamble. Regarding the comment on small combustion sources, please see response to comment EPA-HQ-OAR-2009-0923-1015-11.

Comment Number: EPA-HQ-OAR-2009-0923-1024-12

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

Comments on the Scope of the Proposed Rule. The following section presents Kinder Morgan’s comments on the scope of the proposed Subpart W.

1. Applicability. Kinder Morgan noted in its comments on the original Mandatory Reporting Rule that it is critical for EPA to provide a practical, streamlined, bright-line procedure in the rule for determining whether Subpart W applies to a given facility. As the Mandatory Reporting Rule is currently written, facilities that are potentially subject to Subpart W but most likely below the applicability threshold must still use the full suite of measurement and calculation methodologies provided in the rule in order to determine whether reporting is required.³⁶ To comply with this requirement, Kinder Morgan would have to carry out a full Subpart W emissions assessment at all of the facilities that could potentially meet the criteria in 40 C.F.R. SECTION 98.2(a)(2). This would entail a number of costly and burdensome measures at facilities that are ultimately found to be below the reporting threshold, including, among other things: installing and maintaining flow meters at components targeted for reporting under Subpart W, conducting surveys of components for which population emission factors are used to estimate emissions, and conducting optical scans of facilities in order to detect fugitive emissions from components for which leak emission factors are used. This outcome would defeat the purpose of having a 25,000 metric tons CO₂-e threshold for reporting and will cause Kinder

³⁶ See 40 C.F.R. SECTION 98.2(b) (generally requiring the methods prescribed in each Subpart to be applied to a facility for purposes of applicability determination, if the facility is among the source types listed in 98.2(a)(2)).

Morgan to collect data at numerous facilities that are too small to trigger a reporting requirement.

The Mandatory Reporting Rule already provides a simple screening procedure for combustion devices, by applying a presumption that devices with a heat rate of less than 30 mmBTU/hour are not required to report and allowing other devices to use any of the emission calculation methods provided in Subpart C.³⁷ Similarly, Kinder Morgan believes it is possible to develop a robust screening method for the petroleum and natural gas sector that will avoid the problems described above. To reduce unnecessary compliance and enforcement risk, it is important that the screening method be included in the text of the final rule, rather than provided in the form of guidance. In addition, the screening method must rely on clear objective factors that yield consistent applicability determinations.

For facilities in the onshore natural gas transmission sector, we endorse the proposal submitted by INGAA in its comments on this proposed rule, under which facilities with combustion and event-based blowdown vent emissions of less than 15,000 metric tons CO₂-e per year would not be required to conduct leak detection or monitoring to determine reportability but rather would be presumed to be less than the 25,000 metric tons CO₂-e reporting threshold. As explained in INGAA's comments, this method is simple to apply and would reliably screen out facilities that are clearly below the reporting threshold. For facilities in the onshore petroleum and natural gas production sector, Kinder Morgan supports the recommendation of the American Exploration and Production Council (AXPC) that sites with throughput at or below minimal levels be presumptively excluded from reporting under Subpart W.³⁸

Response: EPA disagrees with inserting the screening language in the rule, and plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting. Please see Section II.F of the preamble in today's final rule. EPA disagrees with the comment to use 15,000 metric tons CO₂-e per year as a screening level or that onshore production facilities below a certain throughput level not be included, as it is the reporters' responsibility to determine applicability with the threshold, please see response to comment EMAIL-0011-1 (comment also located in rulemaking memo "Early Comment Submissions" in docket EPA-HQ-OAR-2009-0923). EPA disagrees with the comment regarding flow meters, as today's final rule does not require any permanent flow meters.

Comment Number: EPA-HQ-OAR-2009-0923-1024-2

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

EPA should provide a simple screening method for determining whether Subpart W applies to individual facilities, so that measurements are not required at facilities with

³⁷ See 40 C.F.R. SECTION 98.2(a)(3), (c).

³⁸ The AXPC comments specifically call for excluding any site with (1) only wellhead fugitive emissions and produced water storage tank emissions, (2) any natural gas production site with less than 3 million standard cubic feet per day (MMSCFD) of production and less than 1 barrel of oil per day (BOPD) condensate production, or (3) any oil stripper well producing less than 10 BOPD.

emissions well below the 25,000 metric tons CO₂-e threshold. Kinder Morgan supports the Interstate Natural Gas Association of America's recommendation that facilities with combustion and event-based blowdown vent emissions of less than 15,000 metric tons CO₂-e are not required to conduct leak detection or monitoring to determine reportability but rather would be presumed to emit less than the 25,000 metric tons CO₂-e per year reporting threshold.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-1024-12.

Comment Number: EPA-HQ-OAR-2009-0923-1024-43

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

SECTION 98.231 Reporting threshold.

(a) You must report GHG emissions from petroleum and natural gas systems if your facility as defined in SECTION 98.230 meets the requirements of SECTION 98.2(a)(2).

(b) For applying the threshold defined in SECTION 98.2(a)(2), you must include combustion emissions from portable *non-emergency* equipment that cannot move on roadways under its own power and drive train and that is stationed at a *production* wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.

Response: EPA has clarified the rule in 98.231 that onshore production and natural gas distribution must include stationary and portable combustion in determining applicability with the threshold. Subpart W does not include combustion emissions from emergency equipment or emergency generators, see subpart C. EPA has removed the 30-day at wellhead clause to avoid practical issues with determining the time the portable equipment is at the wellhead. Please see response to comment EPA-HQ-OAR-2009-0923-1170-7.

Comment Number: EPA-HQ-OAR-2009-0923-1025-2

Organization: Paiute Pipeline Company

Commenter: Jeff Maples

Comment Excerpt Text:

LNG Facilities do not Exceed the Threshold for Fugitives

Paiute's LNG peak-shaving facility would not emit enough fugitive GHGs to exceed the 25,000 tons per year (tpy) CO₂e threshold for being required to report. As a practical matter, LNG facilities should be exempt from reporting because they do not meet the threshold under 40 CFR §98.2(a)(2). However, under the Subpart W proposal, LNG operators would still be forced to engage -- at least once if not periodically-- in the same level of effort to develop component counts, conduct duplicative Subpart W leak surveys using optical gas scanning equipment, and apply dated emission factors in order to demonstrate that GHG emissions from their facilities do

not exceed the regulatory threshold.

LNG facilities contribute minimal amounts to the overall fugitive emissions within the oil and gas processing industry sectors, yet these facilities are proposed to be included in the proposed rule. This makes no sense to us, and we respectfully request that EPA delete LNG facilities from the list of industry segments covered by Subpart W.

Response: For threshold determination the reporter must combine emissions and follow the requirements of Section 98.2, for facilities that contain any source category for which calculation methods are provided, including combustion emissions and equipment leaks. EPA disagrees with eliminating LNG facilities from subpart W, and will continue to retain reporting requirements from LNG facilities. Please see response to comment EPA-HQ-OAR-2009-0923-1025-1. EPA plans to develop voluntary screening tools to facilitate reporting determinations, please see Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1027-6

Organization: Offshore Operators Committee

Commenter: Allen Verret

Comment Excerpt Text:

98.231(b): For applying the threshold defined in § 98.2(a)(2), you must include combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.

OOO Comment: The language in this section would not appear to fit the offshore category. It defines portable equipment that must be included in terms of ability to move on roadways, which suggests that the paragraph was written with the onshore categories in mind. If the requirement to include drilling rigs were to apply offshore, it would be in conflict with GOADS 2008 guidance which only included drilling activities in cases of platform rig applications or jack-up rigs associated with an Area/Block with existing production structures. It would also result in the odd conclusion that portable equipment is included in threshold determination but not in the reporting itself, which according to 98.232(b) is only required for "stationary vented" and "stationary fugitives" sources. Finally, tracking portable equipment offshore such as short-term contractor sources would be a burdensome requirement because of the need to catalog and track specifications of contractor equipment, and represents a very small portion of the overall emissions from an offshore facility that may already be captured if fuel use is aggregated.

Response: Regarding combustion emissions, please see response to comment EPA-HQ-OAR-2009-0923-1027-8.

Comment Number: EPA-HQ-OAR-2009-0923-1031-14

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

In addition, EPA should include an applicability threshold that would not require reporting by operators with small gathering line systems with GHG emissions clearly below the 25k tpy level. We suggest that an appropriate cutoff would be 2,500 miles per owner/operator, which equates to about 25k tpy using EPA's proposed emissions calculation method for gathering lines and assuming the lines contain 100% methane, a worst case assumption.

Response: Natural gas gathering pipelines are not included in today's final rule. For a discussion of this, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1036-1

Organization: Contek Solutions, LLC

Commenter: Jim Johnstone

Comment Excerpt Text:

(98.231) The rules states that portable equipment is to be included for reporting purposes at wellheads. Is portable equipment at production facilities and gas plants exempt from reporting?

Response: In regard to portable equipment combustion emissions under Section 98.231, please see response to comment EPA-HQ-OAR-2009-0923-1024-43.

Comment Number: EPA-HQ-OAR-2009-0923-1039-2

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment Excerpt Text:

An Applicability Screening Method is Needed to Identify Facilities that Report

As defined in 40 CFR Part 98, Subpart A, a 25,000 metric tons CO₂e annual facility emission threshold triggers reporting obligations under the Mandatory Reporting Rule. However, for Subpart W facilities, the absence of a workable screen method to facilitate the applicability determination significantly undermines the benefits of that threshold. To initially determine whether a given natural gas facility exceeds the threshold for emissions reporting, the General Provisions (i.e., Subpart A) require an estimation of facility emissions using the measurement and monitoring methods prescribed in the Final Rule. In subsequent years, per §98.2(h), this facility estimate would need to be revisited to ensure that smaller facilities that did not previously report have not exceeded the reporting threshold in a subsequent year. Thus, while smaller facilities that do not report are relieved of the actual reporting burden, there is significantly more monitoring and measurement required than EPA estimates to ensure compliance.

INGAA strongly recommends that a streamlined applicability screening method be included in the rule for natural gas sector sources to preclude the need for monitoring and measurement at many facilities that fall below the applicability threshold. The Proposed Rule precludes

compliance certainty and unnecessarily complicates regulatory compliance for INGAA members. By defining a screening method to identify affected facilities, compliance certainty can be assured, and unnecessary measurement and monitoring can be avoided.

In developing an applicability screening method, INGAA understands that it is important to ensure, with a high degree of confidence, that facilities with actual emissions above the reporting threshold are captured. Another objective is to define a screening method that provides a means to determine facility applicability based on readily-available information – independent of additional measurement and monitoring requirements. For the natural gas sector, it is understood that combustion, vented and fugitive emissions are all contributors to the total industry and facility-specific inventories. It is also understood that fugitive emissions and some vented emissions are difficult to estimate or measure, and programs are typically not currently in place that support such measurement.

Response: EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting. Please see Section II.F of the preamble in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1041-2

Organization: Spectra Energy Corp

Commenter: Brianne Metzger-Doran

Comment Excerpt Text:

Screening Method Should be Available for Performance of Applicability Determinations

As discussed in detail by INGAA, an applicability screening method is needed to help identify and eliminate from further consideration those facilities that are not required to report under the Proposed Rule. This screening method is important because it will (i) avoid unnecessary costs for testing at smaller facilities that are below the 25,000 metric tons CO₂e threshold, but would otherwise be required to undertake extensive and repeated measurements only to establish that the facility is not subject to the Proposed Rule, and (ii) reduce the already strained availability of service providers and technicians qualified to complete the measurements required by the Proposed Rule. An applicability screening method will also provide additional compliance certainty to both the EPA and the natural gas industry. Spectra Energy supports INGAA’s general approach for an applicability screening protocol.

Response: EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting. Please see Section II.F of the preamble in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1042-10

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment Excerpt Text:

98.231 Reporting Threshold

§98.231(b) Reporting threshold. Requires including combustion emissions from portable equipment that cannot move on roadways under its own power and drive train and that is stationed at a wellhead for more than 30 days in a reporting year, including drilling rigs, dehydrators, compressors, electrical generators, steam boilers, and heaters.

ConocoPhillips Comment:

EPA should specifically acknowledge that portable onshore drilling and completion rigs and mobile offshore drilling units (vessels) are “portable sources”, regardless of time at the same lease block or coordinates, and excluded for rule applicability.

Response: With regards to portable equipment combustion emissions under Section 98.231, please see response to comment EPA-HQ-OAR-2009-0923-1024-43. EPA has removed the 30-day at wellhead clause to avoid practical issues with determining the time the portable equipment is at the wellhead. Please see response to comment EPA-HQ-OAR-2009-0923-1170-7.

Comment Number: EPA-HQ-OAR-2009-0923-1061-6

Organization: Texas Pipeline Association

Commenter: Patrick J. Nugent

Comment Excerpt Text:

The rule should account for circumstances where isolated unplanned or emergency events were the cause of the facility exceeding the 25,000 tpy threshold. Currently, the greenhouse gas reporting rules are structured so that most facilities that exceed 25,000 tpy are subject to the reporting requirements. If a facility is under that threshold for most of the year, but exceeds the threshold late in the year, the facility must begin to comply with the monitoring and reporting requirements. In the oil and gas context, however, it is not possible simply to "flip the switch" and suddenly begin complying with the applicable rules. In order to comply with Subpart W's requirements, a facility must install, test, and bring into operating condition many different types of equipment, gauges, monitors, and computer programs such that easy and immediate compliance will not be possible in many cases.

Accordingly, EPA should tailor its rules such that the reporting requirements would not apply if a facility exceeded the threshold due solely to an unplanned or emergency event. If the sole cause of a facility exceeding the 25,000 tpy threshold is a one-time, isolated, unplanned or emergency event, then that event alone would not subject the facility to the reporting requirements. Events of this nature are not representative of a facility's normal operations and presumably, not of the kind that EPA specifically wants to be covered by the rule. There is no reason why a facility should be pulled into the reporting requirements based on a one-off event, and we would think that EPA would not want to skew its data by including information from such a facility. These considerations, combined with the hardship that would be imposed by a mid-year sudden coverage of the rule in the oil and gas context, argue for modification of Subpart W in a way that excludes facilities whose normal operations result in emissions below

the 25,000 tpy threshold, if the facility exceeded the threshold due to an extraordinary event.

Response: With regards to emergency equipment used during emergency events, please see response to comment EPA-HQ-OAR-2009-0923-1024-43. EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting. Please see Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1074-6

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

75 FR 18617: D. Selection of Reporting Threshold

Comment: WBIH supports the 25,000 mtCO₂e threshold for the natural gas transmission compressor stations and the underground natural gas storage segments of the petroleum and natural gas industry, only.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-0051-1 for more information about the selection of the threshold.

Comment Number: EPA-HQ-OAR-2009-0923-1074-7

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

The 25,000 mtCO₂e threshold was established for facilities with distinct physical boundaries.

Comment: WBIH recommends the addition of a reporting applicability screening method and supports the comments submitted by The Interstate Natural Gas Association of America (INGAA) outlining an applicability screening method.

With an applicability screening method, unnecessary costs for monitoring and measurement will be avoided for facilities under the reporting threshold and reduce additional strain on the limited availability of technology, service providers, and technicians qualified to complete measurements.

Response: EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting. Please see Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1074-8

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

75 FR 18619: E. Selection of Proposed Monitoring Methods

Comment: WBIH recommends Field Level reporting for onshore petroleum and natural gas production with a reporting threshold of 25,000 mtCO₂e.

If EPA maintains the reporting threshold of 25,000 mtCO₂e for field level reporting and includes portable and stationary fuel combustion emission in the threshold determination, the facilities covered by reporting increases from 1,232 to 2,846 (43%) and the percent of facilities covered by reporting only decreases by 1%. (There is no reference for the threshold level listed in Table W-3, so there is no confirmation the field level thresholds include portable equipment emissions. The comments are based on the assumption portable equipment emissions are included.)

Response: EPA disagrees with a field level facility definition for onshore production. Please see Section 5 of the EIA for a discussion of field versus basin coverage and cost issues. In the preamble to the proposed rule, Table W-3 does include onshore production portable combustion; please see the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1080-18

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Aka recommends an emissions-based threshold of 20k tpy CO₂e for gas plants and compression facilities under Subpart W. This threshold would be applied to the combustion emissions from gas plants and compression facilities. If combustion emissions exceed the threshold, then all relevant GHG emissions would be reported for the affected facility. This would recognize the relatively minor contribution to site wide GHGs from the non-combustion sources, and to establish an applicability threshold comparable in scope and format to the threshold in Subpart C.

Response: EPA disagrees with the 20,000 metric ton CO₂e combustion emissions threshold. Please see response to comment EPA-HQ-OAR-2009-0923-0051-1 for more information about the selection of the reporting threshold. Regarding the reporters responsibility to determine applicability with the threshold, please see response to comment EMAIL-0011-1 (comment also located in rulemaking memo "Early Comment Submissions" in docket EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1099-17

Organization: New Mexico Gas Company

Commenter: Curtis J. Winner

Comment Excerpt Text:

Reporting emissions from onshore natural gas transmission compressor stations

Determining whether an onshore natural gas transmission compressor station meets the 25,000 metric ton threshold for reporting:

The proposed regulations are burdensome to compressor facilities which are small in size or do not burn large amounts of natural gas. In order to calculate the GHG emissions for comparison with the 25,000 metric ton threshold, the Greenhouse Gas Reporting Regulation [Subpart A, 98.2 (a)(2)] says that you must estimate annual emissions from stationary fuel combustion units and any applicable source category listed. The applicable source category for NMGC would be the proposed Subpart W. NMGC feels there should be an exemption for small facilities from the burdensome task of annually calculating emissions from Subpart W in order to document that they do not meet the 25,000 tonne threshold if their combustion emissions is less than 20,000 tonnes. The exemption in Subpart A 98.2.a.3.ii (maximum rated heat input capacity) captures only very small facilities and not facilities which regularly emit less than 20,000 tonnes. Combustion and fugitive emissions from natural gas driven pneumatic pumps and blowdown venting are the biggest emitters of greenhouse gases at compressor stations. Therefore, for onshore natural gas transmission compressor stations, the initial calculation to determine if emissions exceed the threshold should include only emissions from combustion, NG driven pneumatic pumps, and blowdown venting. If those emissions do not exceed 20,000 metric ton limit, the additional work of a leak survey and calculating the emissions from all the sources listed in 98.232 (e) should not be required because it will not significantly add to the total emissions. For frame of reference, 5,000 tonnes CO₂e is approximately 13.2 MMscf or 11,880 MMBtu of natural gas. That is thousands of dollars of lost gas that a company could not justify losing.

Response: EPA disagrees that the initial applicability determination process is burdensome, please see response to comment EPA-HQ-OAR-2009-0923-0837-3. For the comment on the 20,000 metric ton CO₂e threshold, please see the response to comment EPA-HQ-OAR-2009-0923-1080-18.

Comment Number: EPA-HQ-OAR-2009-0923-1099-21

Organization: New Mexico Gas Company

Commenter: Curtis J. Winner

Commenter Type: Industry - oil and gas

Comment Excerpt Text:

Proposed Threshold (page 18619)

EPA is seeking comments on the proposed 25,000 metric ton threshold for reporting. NMGC would prefer a higher threshold of 40,000 metric tons and is opposed to a threshold lower than 25,000.

Response: EPA disagrees with the comment on the 40,000 metric ton CO₂e threshold, please see The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98) Section II.E, the

Technical Support Document (TSD) and the Economic Impact Analysis (EIA) for today's final rule found in docket (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1151-69

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment Excerpt Text:

(Preamble pp. 54, 55) EPA is taking comment on whether a 10,000 mtCO₂e threshold for onshore petroleum and natural gas production would be more appropriate.

(Preamble p. 56) In addition to seeking comment on the proposed threshold for onshore production, EPA more broadly is seeking comment on the selection of the threshold for all segments of the petroleum and natural gas industry.

API supports the consistent use of a 25,000 tonnes CO₂e threshold.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-0051-1 for more information about the selection of the threshold.

Comment Number: EPA-HQ-OAR-2009-0923-1152-10

Organization: Consumer Energy Company

Commenter: Amy Kapuga

Comment Excerpt Text:

Clarify That Portable and Stationary Combustion Emissions Are Not Included in the Threshold Determination for Non-Production Facilities under Subpart W

It is not clear how section 98.2(a)(2) in Subpart A relates to threshold determinations under Subpart W. Proposed section 98.231(a) describes the reporting threshold for Subpart W facilities as follows:

“You must report GHG emissions from ... natural gas systems if your facility as defined in §98.230 meets the requirements of §98.2(a)(2).

Section 98.2(a) sets out a facility threshold of 25,000 metric tons per year CO₂e “in combined emissions from stationary fuel combustion units, ... and all source categories listed in Table A-3 of Subpart A.” This may make sense for a traditional Clean Air Act “facility” with contiguous boundaries, where one could survey combustion sources within the fence line, but it makes no sense when applied to a state-wide distribution system under a reporting rule that is intended to estimate and report fugitive and vented emissions. Proposed section 98.230 would create an unusually expansive definition of facility for “Natural Gas Distribution” – encompassing many miles of distribution pipelines and metering and regulating stations that can stretch across an entire state. There could be many small pieces of combustion equipment along gas mains and at

M&R stations scattered across a state. LDCs do not maintain inventories of these small units, and the cost of obtaining a count of such small fuel combustion units would not be justified by the small amount of emissions involved. EPA should not require LDCs to develop an estimate of combustion emissions from such small sources either for threshold or reporting purposes.

While the preamble explains that EPA is proposing to require portable and stationary fuel combustion emissions to be included in the threshold determination for production facilities,³⁹ the proposed regulatory language is not clear. It could be interpreted to apply to wellheads at underground storage facilities as well as production wellheads. The provision should be clarified by revising the beginning of section 98.231 as follows: “For applying the threshold defined in §98.2(a)(2) to onshore production facilities, you must include combustion emissions from portable equipment....”

Response: With regards to portable equipment combustion emissions under Section 98.231, please see response to comment EPA-HQ-OAR-2009-0923-1024-43. EPA disagrees with the comment regarding the CAA, please see response to comments EPA-HQ-OAR-2009-0923-1044-1 and EPA-HQ-OAR-2009-0923-1174-5.

Comment Number: EPA-HQ-OAR-2009-0923-1155-5

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

Entity Threshold

EPA requested input on how to define the Entity Threshold for petroleum and natural gas production

GHG emission reporting. prefer it be coupled with a 10,000 Mt CO₂e Reporting Threshold. We are recommending this lower Reporting Threshold to address our serious concern about, and EPA’s recent findings on, the consistent under-reporting of GHG emissions in the petroleum and natural gas sector. Given the dramatic underestimates discussed above, it is quite possible that an entity determining applicability of the rule using EPA’s emissions factors may calculate that its emissions are below 25,000 tpy when in fact, actual emissions are far higher. The demonstrated inaccuracies discussed above make the establishment of a lower threshold the only prudent choice.

EPA is proposing a Basin-Level Entity Threshold⁴⁰ combined with a 25,000 Mt CO₂e Reporting Threshold. We support the use of a Basin-Level Entity Threshold; yet, prefer it be coupled with a 10,000 Mt CO₂e Reporting Threshold. We are recommending this lower Reporting Threshold to address our serious concern about, and EPA’s recent findings on, the consistent under-reporting

³⁹ 75 Fed. Reg. at 18619.

⁴⁰ Federal Register Vol. 75, No. 69, 18614.

of GHG emissions in the petroleum and natural gas sector. Given the dramatic underestimates discussed above, it is quite possible that an entity determining applicability of the rule using EPA's emissions factors may calculate that its emissions are below 25,000 tpy when in fact, actual emissions are far higher. The demonstrated inaccuracies discussed above make the establishment of a lower threshold the only prudent choice.

Our understanding of the proposed Basin-Level Entity Threshold is that each Operator would be required to aggregate GHG emissions from all the operations it conducts at or above a certain Reporting Threshold within a specific basin. If in aggregate, the Operator does not emit GHGs above the Reporting Threshold, it would be exempt from reporting. This reduces the administrative burden on small operators.

This method also avoids double counting GHG emissions, first from Petroleum and Natural Gas Operators, and then again by Owner companies that own a share of the operation.

This method has the advantage of including individually small, but cumulatively large, sources of emissions from facilities run by a single Operator. We are aware of a number of cases where a single Petroleum and Natural Gas Operator manages several small Petroleum and Natural Gas facilities within a basin that would be individually exempt, but would be included in the MRR if the operations were aggregated across the basin. It is important to capture operations with cumulatively large sources of emissions in this process. A single Operator running a number of separate petroleum and natural gas production facilities across a basin will have an economy of scale for not only reporting emissions, but eventually also for implementing emission reduction opportunities. EPA is proposing to use the American Association of Petroleum Geologists (AAPG) definition of a basin.⁴¹ We support the use of the AAPG basin definition.

While we support EPA's proposal to determine which Operators are required to report under the MRR based on a Basin-Level Threshold, we do request that if an Operator is required to report, that data be provided at a Basin-Level total and then broken down by state and county to allow the EPA dataset to be used efficiently by other jurisdictions. Reporting county and state data should not be an incremental burden on operators because they will need to tally up individual facilities when aggregating the Basin-Level totals.

Alternatively, EPA proposes to use a "Field-Level" reporting scheme. After further review of the petroleum and natural gas sector, we are very concerned that Field-Level reporting may exempt too many facilities from reporting and may further exacerbate the under reporting problem we have outlined above.

If Field-Level reporting scheme is used, substantially lower Reporting Thresholds should be considered to ensure a sufficient number of facilities are captured in the reporting requirements. See our more detailed comments on Reporting Threshold (below).

The Entity Threshold proposed for offshore sources is not clear. It appears that EPA may be

⁴¹ Federal Register Vol. 75, No. 69, 18615.

proposing reporting at an offshore platform level, but this is not explicitly stated in the rule. We recommend that EPA require all reporting at an offshore region threshold. For example, the Operator should combine all emissions from its offshore facilities in a certain region (e.g. California, Gulf of Mexico, Alaska) when determining whether the Reporting Threshold is met. This approach most closely mirrors the onshore Basin-Level approach. The data set should also provide a sufficient level of detail by state and facility to understand the significant contributors to each region.

Furthermore, we do not support reporting offshore petroleum and natural gas facilities at a “Field-Level” Entity Threshold because when combined with Reporting Thresholds of 10,000 to 25,000 Mt CO₂e EPA estimates that only 2-6% of all offshore petroleum and gas production facilities will be captured.⁴² Requiring reporting at an offshore region threshold will increase the number of Operators that are required to participate in the MRR and will improve the quality of the offshore dataset for policy decision making. A single Operator running a number of offshore petroleum and natural gas production facilities in an offshore region will have an economy of scale for not only reporting emissions, but eventually for also implementing emission reduction opportunities.

Response: With regards to adoption of a 10,000 rather than a 25,000 metric ton CO₂e applicability threshold, please see response to comment: EPA-HQ-OAR-2009-0923-0051-1.

Regarding the request that reporters break down emissions reporting into state and county totals, EPA does not require this and does not plan to include this requirement. EPA did not see the benefit of requiring emissions to be broken out by state or county level because reporting at the basin level would be adequate to appropriately inform policy.

Regarding onshore production facility definition, EPA determined the facility definition will remain at the basin level, please see Section II.D of the preamble and the EIA Section 5.

EPA has considered the option of reporting emissions from offshore facilities on a region-wide level. However, in order to reduce burden on reporters and streamline reporting methodologies used by different programs for the same source of emissions, EPA has adopted the Minerals Management Service Gulfwide Offshore Activity Data System (MMS GOADS), which requires reporting of emissions from offshore sources on a platform level. EPA is relying on GOADS to streamline reporting and reduce duplication of effort. For further clarification of the entity threshold and methodology that EPA has adopted for offshore emissions sources, please see Section II.D of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1155-6

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

⁴² 74 Fed Reg. at 16,532-33.

Reporting Threshold

EPA seeks comments on whether a 10,000 Mt CO₂e Reporting Threshold for petroleum and natural gas production would be more appropriate than the 25,000 Mt CO₂e threshold.

It is our preference to use a 10,000 Mt CO₂e Reporting Threshold, especially when combined with field level reporting. A 10,000 Mt CO₂e Reporting Threshold is consistent with the lower reporting thresholds planned for many states. Additionally, the Western Climate Initiative (WCI) plans to use a 10,000 MtCO₂e threshold for petroleum and natural gas systems.⁴³ Use of a 10,000 Mt CO₂e Reporting Threshold provides for harmonization with these other reporting requirements, simplifying industry reporting.

The petroleum and natural gas systems source category is unique because the GHG emission impact is largely comprised of methane, which is also an important energy source. Capture and control of methane not only reduces GHG emissions, but also provides economic benefit to the Operator, making many emission control opportunities in this source category economically attractive. For this reason, a lower Reporting Threshold would be useful to better understand the sources and potential emission reduction targets for methane. In addition, as noted above, the dramatic and acknowledged underestimates of emissions from this sector make establishment of a lower threshold prudent. More specifically, EPA seeks input on whether the reporting threshold should be lowered to 10,000 Mt CO₂e⁴⁴ if EPA defines the reporting entity at the “Field-Level.” We agree that the reporting threshold must be lowered to at least 10,000 Mt CO₂e if EPA defines the reporting entity at the “Field-Level.”

Reporting at a Field-Level requires a lower threshold to be put in place to avoid exempting most oil and gas facilities from the rule. For example, at a 25,000 Mt CO₂e threshold, EPA estimates that only 2% of all offshore petroleum and gas production facilities and 51% of the offshore fugitive emissions would be included.⁴⁵ Additionally, EPA estimates that only 45% of all natural gas transmission compression facility fugitive emissions would be included. This would exempt more than 10 million metric tons of CO₂e from the rule (an amount equal to the entire offshore O&G GHG emission estimate).⁴⁶

EPA estimates that reducing the threshold to 10,000 Mt CO₂e will capture roughly 95% of the O&G “major” emission fugitive emissions sources. Lowering the Reporting Threshold to 10,000 Mt CO₂e will not be burdensome because it still only includes 6% of all offshore petroleum and gas production facilities, 25% of LNG storage facilities, 67% of natural gas transmission compression facilities, 70% of natural gas processing facilities, 80% of LNG import facilities and 87% of underground natural gas storage facilities, per EPA’s current estimates.

If EPA elects to use a higher threshold of 25,000 Mt CO₂e for initial reporting, we recommend

⁴³ See Testimony to the U.S. EPA on the Proposed Mandatory Greenhouse Gas Reporting Rule on Behalf of the WCI Partner Jurisdictions (Apr. 16, 2009).

⁴⁴ Federal Register Vol. 75, No. 69, 18619.

⁴⁵ 74 Fed Reg. at 16,532-33.

⁴⁶ Id.

that this threshold be revisited periodically (no longer than 5-year intervals) to ensure that the rule meets EPA's goal of providing a comprehensive inventory of GHG emissions. The optimum reporting entity definition may not be known until one or more years of data is collected. This is why we recommend that initially data collection be conducted on a finer-scale, with the potential for future relaxation, if the data shows a need to optimize the Entity Reporting and Threshold Reporting levels.

We request that EPA make it very clear in the rule that all GHG emission sources covered under any portion of the MRR at a petroleum or natural gas system facility (for instance, under Subpart W, C, Y, MM, NN, PP, RR) be accumulated and measured against the final reporting threshold. For example, if the Reporting Threshold is set at 10,000 Mt CO₂e and the GHG emissions under Subpart W amount to 8,000 Mt CO₂e and under Subpart C they amount to 4,000 Mt CO₂e, those GHG emissions would be accumulated for a total of 12,000 Mt CO₂e, triggering the Reporting Threshold.

The rule should also be unambiguous that contractor and portable source emissions are also collected by the Operator and included in the total emission estimate for the purposes of determining if the Reporting Threshold is triggered.

Response: With regards to a 10,000 rather than a 25,000 metric ton CO₂e applicability threshold, please see response to comment: EPA-HQ-OAR-2009-0923-0051-1. EPA does agree that results of the rule submissions over the first few years may indicate some need to modify the rule processes. Please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) preamble Section II.L.

For threshold determination the reporter must combine emissions and follow the requirements of Section 98.2, for facilities that contain any source category for which calculation methods are provided, or as specified in subpart W, please see Section II.D of the preamble in today's final rule.

EPA has clarified any ambiguity surrounding emissions reporting from portable equipment operating in petroleum and natural gas facilities. Please see response to comment EPA-HQ-OAR-2009-0923-1016-27.

Comment Number: EPA-HQ-OAR-2009-0923-1156-20

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Page 18617, 18618 and 18619 – Selection of Reporting Threshold – EPA states it is taking comments on whether a 10,000 metric tons/yr CO₂e threshold is more appropriate for onshore petroleum and natural gas production. We disagree that there is any incremental benefit to this proposal and Laclede urges EPA not to adopt any reporting threshold lower than 25,000 metric tons/yr CO₂e. To do so would arbitrarily discriminate against certain operators and it is unnecessarily complex to require this industry sector to track these emissions separately from the

other reporting requirements in the rule. Incidentally, EPA demonstrates in Table W-3 on page 18619 that it already has the capability to calculate oil field fugitive emission, so why require redundant reporting by individual operators?

Response: With regards to a 10,000 rather than a 25,000 metric ton CO_{2e} applicability threshold, please see response to comment: EPA-HQ-OAR-2009-0923-0051-1.

Comment Number: EPA-HQ-OAR-2009-0923-1156-7

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Another one of Laclede's major concerns is that, because the blanket application of emission factors entails so much uncertainty in results, the reporting threshold of 25,000 metric tons/yr CO_{2e} becomes purely arbitrary. Unlike combustion emission factors that are more widely researched and have a better basis in science, natural gas system emission factors are very crude and generalized. It is most questionable that only by virtue of generalized emission factors for LDCs just happening to yield calculated total fugitive emissions of 25,000 metric tons/yr CO_{2e} or more that a natural gas distribution system operator, who has no present obligation to report, could very well be forced to report, not only under subpart W, but also under other subparts of the rule. Operators should only be required to report if there is a strong confidence level that they truly exceed the reporting threshold. Laclede submits that simple application of prescribed emission factors to natural gas distribution system components does not stand up to this standard.

Response: EPA disagrees with the comment on the selection of a 25,000 metric ton CO_{2e} threshold. Please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98);Section II.E of the preamble and the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923) for discussion on the selection of the threshold.

Comment Number: EPA-HQ-OAR-2009-0923-1167-20

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Equipment size thresholds under which reporting is not required or alternative, simpler emission estimation methods are provided. A primary example is small combustion equipment at well sites such as heaters, glycol dehydrator boilers, and separators that are required to report emissions under Subpart W (portable equipment combustion emissions Section 98.233(z)) or Subpart C. As discussed above, rather than requiring all small equipment measure fuel use and/or operating hours per Subpart C Tier 1 estimates, equipment with a burner/fuel use rating less than a significant value should base emissions on very simple methods such as population emission factors and high level activity data such as annual months of operation based on operator records. A threshold value of 0.5 MMBtu/hr is recommended. GHG emissions from combustion equipment equal to or smaller than this threshold should be based on the methods recommended

in Comment IV or similar methods. Further, Noble recommends exempting all natural gas fired equipment burning less than 100 MMBtu/year from reporting.

Response: EPA has considered this comment, and to reduce burden has included equipment thresholds for several calculation methodologies in Section 98.233. For instance, estimation of emissions from glycol dehydrators with throughput less than 0.4 million cubic feet per day involves use of the appropriate emission factor, multiplied by the number of dehydrators. Please see “Equipment Threshold for Tanks,” “Equipment Threshold for Dehydrators,” “Equipment Threshold for Blowdowns,” “Equipment Threshold for Small Combustion Units,” and “Compressor Modes and Threshold” under EPA-HQ-OAR-2009-0923 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1167-12

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Noble Energy onshore production operations include thousands of small stationary and portable fuel combustion units including compressor drivers, heaters, separators, and glycol dehydrator boilers. The majority of these small combustion equipment are at remote locations without a power source. It is assumed that simple fuel use estimation methods, such as burner ratings and estimated operating hours, rather than direct fuel and/or operating hour monitoring will be considered “company records” for Subpart C Tier 1 (e.g. Section 98.33(a)(1)) emission estimates. For example, the estimated cost to install and monitor mechanical totalizing flow meters on all affected combustion equipment exceeds the combined compliance costs for all other emission sources. Thus, as discussed below, combustion equipment firing rate threshold(s) to exclude small equipment and/or allow simple emission estimation methods are needed.

Response: Please see response to comment: EPA-HQ-OAR-2009-0923-1167-20.

Comment Number: EPA-HQ-OAR-2009-0923-1167-2

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

This proposed definition of “reporting area” clearly defines the geographic reporting boundaries for an owner or operator of onshore petroleum and natural gas production sources which are subject to the reporting requirements without creating confusion and uncertainty regarding the term “facility” or unintentionally expanding the meaning of “facility.” It also applies to the triggering threshold of 25,000 metric tons of CO₂ or more per year required under 98.2(a)(2). Therefore, the above proposed definition of “reporting area” does not change sources subject to Subpart W nor what emissions are required to report. In addition, the Section 98.6 definition of facility should be retained and apply to onshore petroleum and natural gas production. The Proposed Rule language regarding reporting threshold should also be revised to accurately reflect the scope of sources subject to reporting and the geological range applicable to reporting.

Therefore, Noble respectfully suggests the following revision to the proposed section 98.231, Reporting Threshold:

(a) You must report GHG emissions from petroleum and natural gas systems if your offshore petroleum and natural gas production, onshore natural gas processing plants, onshore natural gas transmission compression, underground natural gas storage, liquefied natural gas (LNG) storage, LNG import and export equipment, or natural gas distribution facility as defined in Section 98.230 or Section 98.238 or offshore petroleum and natural gas production reporting area as defined in Section 98.238 meets the requirements of Section 98.2(a)(2).

In addition, proposed section 98.231(b) should be deleted in its entirety as it creates ambiguity and unnecessary complexity for reporting threshold determinations. To provide further clarity that a reporting area must meet the reporting threshold, Noble proposes the following amendment to Section 98.2:

Section 98.2 – Who must report?

An owner or operator of onshore petroleum and natural gas production facilities that have total emissions from all facilities located within an onshore petroleum and natural gas production reporting area (as defined in Section 98.238) of 25,000 metric tons CO₂e or more per year.

If EPA does not accept Noble’s recommended revisions to the Proposed Rule’s definition of offshore petroleum and natural gas production facility, Noble believes it is imperative that EPA include language in the Rule to state that the Rule’s definition of offshore petroleum and natural gas production facility will not be applied elsewhere in the CAA and will not impact other EPA regulations.

Response: EPA disagrees with the comments on facility definition; please see response to comments EPA-HQ-OAR-2009-0923-1044-1, EPA-HQ-OAR-2009-0923-1174-5 and Topic 2: Aggregation of Gathering and Boosting Systems with Processing Facilities in Volume 9 of the Response to Comments document . EPA disagrees with the comment regarding threshold determination, please see response to comment EPA-HQ-OAR-2009-0923-1155-6. EPA has determined that the reporters’ comments in the last paragraph refer to “onshore”, not “offshore” as submitted.

Comment Number: EPA-HQ-OAR-2009-0923-1167-35

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

A streamlined rule applicability screening method is necessary to identify facilities that are not required to report. EPA should provide a practical applicability screening approach for rapidly and efficiently determining Rule subjectivity based on the 25,000 tonne per year CO₂e reporting threshold. The inability to determine rule applicability with a reasonable degree of certainty will require emission estimations for numerous small facilities/reporting areas to ensure compliance

certainty. This significantly adds to the regulatory burden and cost that have not been considered as part of this rulemaking. Noble strongly recommends that a streamlined applicability screening method be included in the rule for natural gas sector sources to preclude the need for monitoring and measurement in reporting areas that fall below the applicability threshold.

For onshore petroleum and natural gas production reporting areas covered by Subpart W, determining Proposed Rule applicability (i.e., annual GHG emissions above 25,000 metric tons CO₂e) for a given facility/reporting area significantly undermines the benefits of that threshold for reporting areas covered under the Subpart. To initially determine whether a given reporting area exceeds the threshold for emissions reporting, the General Provisions require reporting area emissions be estimated using the measurement and monitoring methods prescribed in the Final Rule. In subsequent years, per Section 98.2(h), this estimate would need to be revisited to ensure that smaller reporting areas that did not previously report have not exceeded the reporting threshold in a subsequent year. Thus, while smaller reporting areas that do not report are relieved of the actual reporting burden, there is significantly more monitoring and measurement required than EPA estimates to ensure compliance.

Response: EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting, please see Section II.F of the preamble. EPA disagrees that the initial applicability determination process is burdensome, please see The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98) preamble Section II.P EPA has estimated the burden for reporting determination made by non-reporters and it is included in the EIA.

Comment Number: EPA-HQ-OAR-2009-0923-1167-6

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

In addition to removal of unnecessary emission sources, Noble recommends that the Proposed Rule revisions to reduce burden while collecting GHG emissions data to develop a representative inventory include alternative, simpler, streamlined GHG emission estimation methods:

Equipment size thresholds under which reporting is not required and/or alternative, simpler emission estimation methods (e.g. emission factors) apply;

Response: Regarding equipment thresholds, please see response to comment EPA-HQ-OAR-2009-0923-1167-20.

Comment Number: EPA-HQ-OAR-2009-0923-1170-3

Organization: Pioneer

Commenter: Gretchen Kern

Comment Excerpt Text:

Screening criteria must be proposed to determine if facilities exceed reporting threshold

EPA has not provided a screening mechanism for any of the sector categories covered by Subpart W; therefore all oil and natural gas facilities would have to compile a GHG inventory to even determine if they exceed the threshold. Due to the unpredictable nature of associated gas venting and flaring, venting from tanks that fluctuates with throughput and temperature changes, compressor vents, and fugitive leaks, in particular, a facility would not be able to establish applicability to Subpart W reporting until well into a calendar year and perhaps not until the end of a calendar year. Further, the cost and time burden to screen each basin alone would be enormous. EPA should provide a simple screening approach to determine applicability with certainty in January of each calendar year.

3. Reasonable reporting thresholds should be established for equipment with minimal GHG emissions

EPA does not incorporate thresholds for applicability or for using simplified calculations at the equipment level. As a result, excessive burden would be placed on operators having to perform complex process models, simulations, and sampling for equipment with minimal GHG emissions. EPA should establish threshold levels for emissions sources to eliminate insignificant units and reduce the reporting burden.

Response: EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting, please see Section II.F of the preamble. Regarding equipment thresholds, please see response to comment EPA-HQ-OAR-2009-0923-1167-20.

Comment Number: EPA-HQ-OAR-2009-0923-1173-12

Organization: Resolute Energy Corporation

Commenter: Patrick E. Flynn

Comment Excerpt Text:

Reporting threshold

"Although EPA is proposing an emissions threshold of 25,000 mtCO₂e for all segments of the petroleum and natural gas industry, EPA is taking comment on whether a 10,000 mtCO₂e threshold for onshore petroleum and natural gas production would be more appropriate." (75 FR 18619)

Resolute Comments:

Resolute does not object to EPA's decision to use 25,000 metric tons CO₂e per year as the threshold to determine which facilities will be subject to the reporting rule, including for the onshore petroleum and natural gas sector, as this reporting threshold level is consistent with other Subparts of the MRR.

Resolute strongly opposes a lower reporting threshold of 10,000 tons per year specifically for onshore petroleum and natural gas production, as both unwarranted and unduly burdensome. As indicated in the Preamble at Table W-2 (75 FR 18617), such a lower threshold would only increase total emissions covered by Proposed Subpart W from onshore petroleum and natural gas production by 6% but subject nearly 1,200 additional facilities to its requirements. This minimal increase in information for the EPA is simply not justified by the increased burden and cost that would be placed on the industry.

Response: With regards to a 10,000 rather than a 25,000 metric ton CO₂e applicability threshold, please see response to comment: EPA-HQ-OAR-2009-0923-0051-1.

Comment Number: EPA-HQ-OAR-2009-0923-1197-5

Organization: NiSource, Inc.

Commenter: Kelly Carmichael

Comment Excerpt Text:

Applicability screening - NiSource strongly recommends a simple applicability screening method to determine which facilities need reporting per the rule requirements. This will ascertain compliance and avoid unnecessary cost associated with testing facilities with less than 25,000 metric tons of CO₂e. We propose that a facility may only be considered as an affected facility, if GHG emissions from combustion and event-based blow-down venting exceed a threshold of 15,000 metric tons of CO₂e.

Response: EPA plans to develop voluntary screening tools to assist reporters in determining whether they meet the threshold for reporting, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1201-2

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

EPA Should Consider Lower Threshold Reporting Levels For Several Oil and Gas Sector Sources.

As with EPA's original proposed reporting requirements for the oil and gas sector, EPA is proposing a reporting threshold of 25,000 metric tons per year (TPY) of carbon dioxide equivalent (CO₂eq) for all segments of the petroleum and natural gas industry. Fugitive, vented, and combustion emissions from stationary and portable equipment are proposed for inclusion in the threshold determination for this source category.⁴⁷ EPA is requesting comment on whether a 10,000 metric TPY CO₂eq threshold for onshore petroleum and natural gas production would be more appropriate and, more broadly, is seeking comment on the selection of the threshold for all segments of the petroleum and natural gas industry.

⁴⁷ See 75 FR 18617, April 12, 2010.

We see the 25,000 TPY-threshold reporting level as a solid first step towards a strong reporting program. That said, we urge EPA to consider implementing lower threshold reporting levels where opportunities allow for an appropriate balance between the number of facilities reporting and the amount of emissions captured. The one-size-fits-all approach of using 25,000 TPY CO₂e does not allow EPA to take advantage of opportunities where the benefits of a lower reporting threshold could be huge in comparison to the associated costs or burdens.

For the various subcategories of the oil and gas sector, the 25,000 TPY reporting threshold, as applied to emissions sources in the supplemental reporting rule, captures approximately 83% of fugitive methane and carbon dioxide emissions from the oil and gas industry and would be applicable to only a very small fraction of total facilities (approx. 8.5%).⁴⁸ Because this falls short of EPA's stated range of capturing 85 to 90 percent of emissions,⁴⁹ we recommend that EPA consider including more of this sector's emissions in this first version of the reporting rule. Reducing the threshold to 10,000 metric tons of CO₂e will capture roughly 90% of the oil and gas "major" emission fugitive emissions sources, and will still only include 6% of all offshore petroleum and gas production facilities, 9% of onshore oil and gas production facilities, 26% of LNG storage facilities and the same percentage of LNG import facilities as with the higher threshold (80%).

The Offshore Petroleum and Gas Production Facilities source category has an estimated 3,235 facilities. Under the proposed 25,000 TPY reporting threshold, only 58 facilities (2%)—accounting for less than half of all emissions—would be required to report.⁵⁰ Under a 10,000 TPY threshold, six percent of facilities—accounting for almost two-thirds of all emissions—would be required to report. In other words, an incremental increase of four percent in facilities covered would increase the emissions captured from 45 percent to 63 percent (an 18% incremental change).

The threshold analysis discussion in EPA's technical support document for the original oil and gas sector proposal indicates that "[t]he general rationale for selecting a reporting threshold could be to identify a level at which the incremental emissions reporting between thresholds is the highest for the lowest incremental increase in number of facilities reporting between the same thresholds."⁵¹ An illustration of this analysis, using emissions and facility data from EPA's original proposal, follows:

⁴⁸ See 75 FR 18619, April 12, 2010.

⁴⁹ See 74 FR 16467, April 10, 2009.

⁵⁰ See Table W-2 Threshold Analysis for Fugitive Emissions from the Petroleum and Natural Gas Industry at 75 FR 18617-18618.

⁵¹ EPA-HQ-OAR-2008-0508-0023, Oil and Natural Gas Systems Technical Support Document (TSD), p. 23.

Table 1. Offshore Petroleum & Gas Production Facilities Threshold Analysis (2009)

Threshold [TPY CO _{2eq}]	Emissions [%]	Incremental Change*	Facilities [%]	Incremental Change*
1,000	96	29	40	34
10,000	67	16	6	4
25,000	51	20	2	1.5
100,000	31		0.5	

* Incremental change in emissions from the previous category (e.g., at 10,000 TPY the incremental change in emissions and in facilities from the 25,000 TPY reporting threshold is 16% and 4%, respectively).

EPA’s original proposal concluded that a reporting threshold of 10,000 TPY was not optimum since, at this reporting threshold, the incremental change in emissions decreases over the previous threshold from 20% to 16% but the number of facilities required to report increases from 1.5% to 4%. EPA’s supplemental proposal, however, includes different data where the incremental change in emissions increases over the previous threshold from 16% to 18% while the number of facilities required to report only increases from 2% to 4% (see Table 2 below).

Table 2. Offshore Petroleum & Gas Production Facilities Threshold Analysis (2010)

Threshold [TPY CO _{2eq}]	Emissions [%]	Incremental Change*	Facilities [%]	Incremental Change*
1,000	94	31	37	31
10,000	63	18	6	4
25,000	45	16	2	2
100,000	29		0	

* Incremental change in emissions from the previous category (e.g., at 10,000 TPY the incremental change in emissions and in facilities from the 25,000 TPY reporting threshold is 18% and 4%, respectively).

EPA should consider, based on its own rationale, a lower reporting threshold for the Offshore Petroleum and Gas Production category.

In addition, we request that EPA consider implementing a reporting threshold lower than the 25,000 TPY level for any source category where the incremental change in emissions from the previous threshold exceeds the incremental change in the number of facilities required to report.

For example, the 10,000 TPY reporting threshold for offshore production allows for an incremental change in emissions covered from the previous level of 18%. This exceeds the incremental change in the number of facilities required to report, which is 4%. By comparison, under a 1,000 TPY threshold, the incremental change in the number of facilities required to report (31%) equals the incremental change in emissions covered (31%). This level of reporting may be considered overly burdensome, because the greater coverage of facilities does not justify the greater coverage of emissions.

Applying the above comparison to other source categories in the oil and gas sector would result in the following suggested thresholds changes:

Table 3. Suggested Changes in Threshold Levels for Oil and Gas Sector Source Categories

Source Category	Reporting Threshold [TPY CO _{2eq}]
Onshore Petroleum & Gas Production Facilities	10,000
Offshore Petroleum & Gas Production Facilities	10,000
Natural Gas Processing Facilities	No change
Natural Gas Transmission Compression Facilities	No change
Underground Natural Gas Storage Facilities	No change
LNG Storage Facilities	10,000
LNG Import Facilities	10,000

For the Onshore Petroleum & Gas Production Facilities, Offshore Petroleum & Gas Production Facilities, LNG Storage Facilities and LNG Import Facilities, EPA should consider implementing the lower reporting threshold of 10,000 TPY CO_{2eq}. We recommend that EPA consider this more source-specific approach to establishing applicable reporting thresholds. EPA should consider establishing a minimum reporting threshold of 25,000 TPY CO_{2eq} for all applicable source categories, and should also take advantage of opportunities where a 10,000 TPY CO_{2eq} threshold is reasonable (see, e.g., Table 3). In particular, EPA should re-consider a lower reporting threshold for the Offshore Petroleum & Gas Production Facilities based on a review of its own threshold analysis.

Response: With regards to a 10,000 rather than a 25,000 metric ton CO_{2e} applicability threshold, please see response to comment EPA-HQ-OAR-2009-0923-0051-1. In addition, the 10,000 metric ton CO_{2e} threshold would increase burden, please see the Economic Impact Analysis Section 5 EPA-HQ-OAR-2009-0923.

Comment Number: EPA-HQ-OAR-2009-0923-1201-4

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

EPA is specifically seeking comment on whether the threshold for onshore petroleum and gas production should be lowered to 10,000 metric TPY CO_{2eq} if reporting were to be at the field level instead of at the basin level. Table W-3 (75 FR 18619) shows the emissions coverage and entities reporting for a field-level facility reporting system.

The data currently available suggest that if reporting is at the field level, the reporting threshold should be no more than 10,000 TPY. A 10,000 TPY threshold would cover 64 percent of the emissions generated while only requiring 3 percent of facilities to report. This would be an incremental increase from the 1000 TPY threshold of 9% for emissions covered with only a 1% increase in the number of facilities required to report. By comparison, a threshold level of 1,000 TPY could be considered overly burdensome, since the incremental increase in emissions covered is 28%, and the incremental increase in the number of facilities required to report is 45%.

We urge EPA to quantify and assess the emissions covered and facilities required to report under a 5,000 TPY reporting threshold scenario.

Response: With regards to the applicability threshold, please see response to comment: EPA-HQ-OAR-2009-0923-0051-1.

Comment Number: EPA-HQ-OAR-2009-0923-1201-5

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment Excerpt Text:

Finally, EPA should consider how its reporting system will potentially harmonize with future programs to reduce GHG emissions that may be implemented at the state, regional, national and even international level (e.g., the American Clean Energy and Security Act before Congress). The version of the American Clean Energy and Security Act passed by the House of Representatives in 2009 and currently before the Senate includes provisions for periodic review of the threshold value that is used to define the covered entities.⁵² Similarly, EPA should establish, as part of the final reporting rule, a schedule for frequent, regular periodic review of the emissions reporting threshold. Data estimates are changing rapidly in this area, and EPA should commit to revising the reporting rule requirements based on changes in the reporting knowledge. The review should require an assessment of whether lower threshold reporting levels can effectively be achieved, and how EPA can provide expertise in the development of national climate policy.

Response: At this time, there are no plans to conduct periodic reviews of the 25,000 metric tons CO₂e applicability threshold in today's final rule. Regarding the threshold selection, please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) preamble Section II.E, the Technical Support Document (TSD) and the Economic Impact Analysis (EIA) for today's final rule (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1206-17

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

In addition, EPA should include an applicability threshold that would not require reporting by operators with small gathering line systems with GHG emissions clearly below the 25,000 tpy threshold level. We suggest that an appropriate cutoff would be 2500 miles per owner/operator, which equates to about 25,000 tpy using EPA's proposed emissions calculation method for gathering lines and assuming the lines contain 100% methane, a worst case assumption. Lastly, for entities who must report emissions from gathering lines, the emissions should be calculated

⁵² HR 2454, Passed House June 26, 2009, In Senate (July 6, 2009 - Received and read the first time, July 7, 2009 - Read the second time and placed on the calendar).

simply as the product of miles of gathering lines times an appropriate per mile emissions factor. This value should be reported as a total for each company, rather than being reported on a facility basis. Lastly, to accommodate this reporting method, the rule should allow companies to use an overall estimate of CO₂ and CH₄ content.

Response: In today's final rule, gathering lines and boosting stations are not included. Please see Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1206-19

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Screening criteria and levels are necessary to establish the requirement to report under Subpart W.

Based on the currently proposed calculation methods in Subpart W, emissions from many of the GHG sources are unpredictable, which will make determining applicability relative to the 25,000 tpy threshold impractical. In particular, emissions from the following sources cannot be easily predicted: blowdowns, flares, compressor vents and seals, and fugitive leaks. Due to the unpredictable nature of these sources, a facility will not be able to establish applicability to Subpart W reporting until well into a calendar year and perhaps not until the end of a calendar year. Also, for compressor vents and seals and fugitive leaks, a facility will not be able to determine emissions from the sources until the direct detection and measurement is completed. In order for the regulated community to establish applicability of the GHG reporting rule, specifically for Subpart W, applicability criteria need to be established that allows this determination to be made with certainty in January of each calendar year. Not doing so will greatly increase the costs of compliance with little or no improvement in the GHG emission reports.

For gas plants and gathering compression facilities the majority of GHG emissions come from combustion sources covered by Subpart C. Thus, it makes sense to establish applicability criteria for these facilities that is keyed to the current Subpart C applicability threshold of 25,000 tpy. Of course, gas plants and compression facilities will emit GHGs from sources other than the combustion sources. So, in light of the relatively minor contribution to sitewide GHGs from the non-combustion sources, and to establish an applicability threshold comparable in scope and format to the threshold in Subpart C, we recommend a Subpart W applicability threshold based on Subpart C GHG emissions of 20,000 tpy CO₂e for gas plants and compression facilities under Subpart W. If Subpart C combustion emissions exceed the threshold, then all relevant Subpart W GHG emissions would be reported for the affected facility in addition to the Subpart C emissions. This method for determining applicability provides much needed certainty to the regulated community at the beginning of a reporting year so that an operator can budget and plan for the activities required to comply with the rule requirements. GPA believes this applicability determination method is most appropriate, but we also realize there are other possible methods to establish applicability early in a reporting year and GPA would welcome the opportunity to

discuss alternative with the EPA, if they so desire.

For gathering pipelines, as discussed in item 2 above, if the EPA insists the related emissions be reported, we recommend an applicability threshold of 2500 miles per owner or operator. Using the calculation methods provided for gathering lines in the proposed Subpart W, this roughly corresponds to a 25,000 tpy emissions-based applicability threshold assuming full time operation and 100% methane in the pipeline. As with our prior recommendation, this cutoff is reasonable and appropriate because it would be comparable in scope to the 25,000 tpy threshold provided in Subpart C.

Response: In today's final rule, gathering lines and boosting stations are not included, please see Section II.F of the preamble in today's final rule. EPA plans to develop voluntary screening tools to facilitate reporting determinations. Please see Section II.F of the preamble. EPA disagrees that the initial applicability determination process is burdensome, please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) preamble Section II.P. Regarding a 20,000 metric ton CO₂e applicability threshold, please see response to comment EPA-HQ-OAR-2009-0923-1080-18.

Comment Number: EPA-HQ-OAR-2009-0923-1206-2

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

To solve these problems, we recommend that each gas processing plant, gathering compression facility and treating facility should report individually and should report only if emissions exceed specified thresholds.

Response: In today's final rule, gathering lines and boosting stations are not included, please see Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1206-20

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Reasonable reporting thresholds should be established for equipment with minimal GHG emissions.

EPA does not incorporate thresholds for applicability or for using simplified calculations at the equipment level. As a result, in many cases complex process models and simulations are required for equipment with minimal GHG emissions. EPA should establish screening levels for emission sources to eliminate insignificant units and reduce the reporting burden, as is done in other subparts of 40 CFR Part 98.

One example of this is related to tanks, for which the same annual calculation method is

prescribed regardless of the tanks throughput, for example a tank that fills at a rate of 1 barrel/day versus a tank that fills at a rate of 100 barrels/day. The prescribed method requires analysis of the separator liquid and collection of numerous operating parameters. The liquid analysis is expensive and often the sample is difficult or impossible to collect, even with higher liquid production rates, and should not be required for tanks with minimal throughput. Across the industry, there are thousands of tanks associated with very low liquid production rates and, therefore, minimal GHG emissions. GPA recommends that tank batteries with a throughput of less than 5 barrels/day of hydrocarbon condensate be excluded from reporting under Subpart W. If an exclusion cannot be provided, GPA recommends tank batteries below the 5 barrel/day of hydrocarbon condensate threshold be allowed to use the appropriate emission factor from the API Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry (“API Compendium”), E&P Tanks, or other comparable simulation software in place of conducting modeling using process simulations.

Another example is related to gas dehydration units, which are required by the proposed Subpart W to estimate annual emissions using the GLYCalc process simulator. As with tanks, there are thousands of very small dehydration units operating across the natural gas industry with minimal GHG emissions. GPA recommends that dehydration units with a throughput of less than 3 million scf/day be excluded from reporting under Subpart W. If an exclusion cannot be provided, GPA recommends dehydration units below the 3 million scf/day threshold be allowed to use the appropriate emission factor from the API Compendium in place of conducting modeling using process simulations.

Response: Regarding equipment thresholds, please see response to comment EPA-HQ-OAR-2009-0923-1167-20.

Comment Number: EPA-HQ-OAR-2009-0923-1206-38

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Regarding this section on blowdown vent stack, there are a limited number of tasks in the natural gas industry that result in blowing down significant volumes of natural gas to the atmosphere. These activities are limited to blowing down compressors, process vessels, and piping. There are other tasks in the natural gas industry that result in blowing down very small and insignificant volumes of natural gas, such as blowdowns from sight glasses and small tubing.

Without thresholds which limit the blowdowns that must be recorded, calculated, and reported, this portion of the proposed Subpart W will be unmanageable. GPA recommends that GHGs from only the following blowdowns be reported: 1) all compressor blowdowns; and 2) blowdowns from process vessels and piping with a physical volume of 50 cubic feet and larger.

Response: EPA has considered this comment, and to reduce burden has included an equipment threshold for blowdowns, please see “Equipment Threshold for Blowdowns” under EPA-HQ-OAR-2009-0923 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1206-46

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

The section on reciprocating compressor rod packing vents is one of the most burdensome sections of the proposed rule due to the level of effort required to measure relatively small emissions. First, there is an important inconsistency between the preamble and the proposed rule text. The preamble speaks only to large compressors. See Table W-4. In contrast, the proposed rule text would encompass all reciprocating compressors, regardless of size. Consistent with the preamble, emissions should be reported only for large compressor, which should be defined to include compressors of 2000 hp or more.

Response: EPA has revised today's final rule for monitoring requirements of reciprocating compressors to reduce burden, please see Section II.F of the preamble. EPA has also revised today's final rule to reduce burden for onshore production reciprocating compressors to allow the use of emission factors, please see "Compressor Modes and Threshold" under EPA-HQ-OAR-2009-0923.

Comment Number: EPA-HQ-OAR-2009-0923-1206-9

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Gathering compression facilities are typically small facilities and widely dispersed. Many of these compression facilities have only one or two compressors and may include treatment facilities, such as dehydration units. Significantly-sized facilities are already subject to Subpart C reporting if the combustion emissions exceed 25,000 metric tons per year ("tpy") and individual compression facilities that exceed 25,000 tpy, including Subpart W emissions, would also begin reporting as required.

Response: In today's final rule, gathering lines and boosting stations are not included, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1298-58

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Furthermore, on May 13, 2010, EPA issued the final "Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule" that established a GHG applicability threshold of 100,000 metric tons CO₂e per year for a single "facility" (according to the proper CAA definition of facility). Thus, EPA has recently set a precedent for a much higher threshold for GHG emissions which it deems worthy of consideration for emissions reporting. Therefore, IPAMS requests that EPA set the threshold for a reporting area that encompasses an entire

hydrocarbon basin at a minimum of 100,000 metric tons CO₂e per year.

Response: EPA disagrees with the comment on threshold selection, please see The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98) preamble Section II.E, the Technical Support Document (TSD) and the Economic Impact Analysis (EIA) Section 5 (EPA-HQ-OAR-2009-0923). EPA disagrees with the comment on the PSD tailoring rule, please see response to comment EPA-HQ-OAR-2009-0923-1044-1. EPA is gathering data under the reporting rule that may be used for a variety of reasons under the CAA. Thus, the PSD and Title V thresholds through 2016 are not dispositive of the issue. Moreover, the information EPA gathers under the reporting rule from sources below those thresholds may in fact prove useful for the subsequent review of the thresholds EPA plans to undertake.

Comment Number: EPA-HQ-OAR-2009-0923-1298-65

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Applicability Thresholds: Based on the currently proposed calculation methods in Subpart W, emissions from many of the GHG sources are unpredictable, which will make determining applicability relative to the 25,000 metric tons CO₂e threshold impractical. In particular, emissions from the following sources cannot be predicted: blowdowns, flares, compressor vents and seals, and fugitive leaks. Due to the unpredictable nature of these sources, a facility will not be able to establish applicability to Subpart W reporting until well into a calendar year and perhaps not until the end of a calendar year. Also, for compressor vents and seals and fugitive leaks, a facility will not be able to determine emissions from the sources until the direct detection and measurement is completed. In order for the regulated community to establish applicability of the GHG reporting rule, specifically for Subpart W, applicability criteria need to be established that allow this determination to be made with certainty in January of each calendar year, if not earlier.

Response: Please see the response to comment EPA-HQ-OAR-2009-0923-1206-19.

Comment Number: EPA-HQ-OAR-2009-0923-1298-68

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

For gas plants and gas gathering compression facilities, the majority of GHG emissions come from combustion sources covered by Subpart C. Thus, it makes sense to establish applicability criteria for these facilities that is linked to the current Subpart C applicability threshold of 25,000 metric tons CO₂e. Of course, gas plants and compression facilities will emit GHGs from sources other than the combustion sources. So, in light of the relatively minor contribution to site-wide GHG emissions from the non-combustion sources, and to establish an applicability threshold comparable in scope and format to the threshold in Subpart C, IPAMS requests an emissions-based threshold of 25,000 metric tons CO₂e for gas plants and compression facilities under

Subpart W. This threshold would be applied to the combustion emissions from gas plants and compression facilities. If combustion emissions exceed the threshold, then all relevant GHG emissions would be reported for the affected facility.

Response: Please see the response to comment EPA-HQ-OAR-2009-0923-1080-18.

Comment Number: EPA-HQ-OAR-2009-0923-1298-69

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

For gas gathering pipelines, IPAMS requests an applicability cutoff of 2,500 miles per owner or operator. Using the calculation methods provided for gas gathering lines in the proposed Subpart W, this roughly corresponds to a 25,000 metric tons CO₂e emissions-based applicability threshold. As with IPAMS' prior recommendation, this cutoff is reasonable and appropriate because it would be comparable in scope to the 25,000 metric tons CO₂e threshold provided in Subpart C.

Response: In today's final rule, gathering lines and boosting stations are not included, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1298-7

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Furthermore, this rule should track to the recently released tailoring rule and only require reporting for facilities emitting 75,000 metric tons per year or more of greenhouse gas emissions. Subpart W, which aggregates over a wide geographic area in order to fold more facilities into the 25,000 tpy CO₂e threshold, is contrary to EPA's stated goal of limiting the impact of climate change regulation to small businesses.

Response: With regards to threshold selection and the PSD tailoring rule, please see response to comment EPA-HQ-OAR-2009-0923-1298-58. With regards to small business, please see response to comment EPA-HQ-OAR-2009-0923-1005-7.

Comment Number: EPA-HQ-OAR-2009-0923-1298-70

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Insignificant Screening Levels: EPA does not incorporate thresholds for applicability or for using simplified calculations at the equipment level. As a result, in many cases expensive sampling,

monitoring, and complex process models and simulations are required for equipment with minimal GHG emissions. IPAMS requests that EPA establish screening levels for emission sources to eliminate insignificant units and reduce the reporting burden, as is done in other subparts of 40 CFR Part 98.

One example of this is related to tanks for which the same annual calculation method is prescribed regardless of the tanks throughput. For example, a tank that fills at a rate of 1 bbl/day versus a tank that fills at a rate of 100 bbl/day. The prescribed method requires analysis of the separator liquid and collection of numerous operating parameters. The liquid analysis is expensive (approximately \$1,000/sample) and often the sample is difficult or impossible to collect, even with higher liquid production rates, and should not be required for tanks with minimal throughput. Across the industry, there are thousands of tanks associated with very low liquid production rates and, therefore, minimal GHG emissions. IPAMS requests that condensate tank batteries with a throughput of less than 5 bbl/day and crude oil tank batteries with a throughput of less than 30 bbl/day be excluded from Subpart W reporting (the thresholds are different due to the lower volatility of crude oil compared to condensate). If an exclusion cannot be provided, IPAMS requests that condensate tank batteries below the 5-bbl/day threshold and crude oil tank batteries below the 30-bbl/day threshold be allowed to use the appropriate emission factor from the API Compendium of Greenhouse Gas Emission Methodologies for the Oil and Gas Industry (“API Compendium”) in place of conducting modeling using process simulations.

Another example is related to gas dehydration units that are required by the proposed Subpart W to estimate annual emissions using the GLYCalc process simulator. As with tanks, there are thousands of very small dehydration units operating across the natural gas industry that have minimal GHG emissions. IPAMS requests that dehydration units with a throughput of less than 3 MMscf/day be excluded from Subpart W reporting. In addition, IPAMS requests that all dehydration units that require reporting under Subpart W be allowed to use the appropriate emission factor from the API Compendium in lieu of conducting modeling using process simulations.

Response: For a response to this comment, please see EPA-HQ-OAR-2009-0923-1167-20.

Comment Number: EPA-HQ-OAR-2009-0923-1298-74

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Reporting Threshold: Page 18619 of the Subpart W preamble states:

Although EPA is proposing an emissions threshold of 25,000 mtCO₂e for all segments of the petroleum and natural gas industry, EPA is taking comment on whether a 10,000 mtCO₂e threshold for onshore petroleum and natural gas production would be more appropriate.” (75 FR 18619)

IPAMS strongly opposes a lower reporting threshold of 10,000 metric tons CO₂e per year specifically for onshore petroleum and natural gas production, as both unwarranted and unduly burdensome. As indicated in Table W-2 on page 18617 of the preamble, such a lower threshold would only increase total emissions covered by Subpart W from onshore petroleum and natural gas production by 6%, but subject nearly 1,200 additional facilities to the requirements, representing a doubling the number of facilities covered. This minimal increase in GHG information for EPA is simply not justified by the increased burden and cost that would be placed on the industry.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-0051-1.

Comment Number: EPA-HQ-OAR-2009-0923-1305-38

Organization: BP America, Inc.

Commenter: Karen St. John

Comment Excerpt Text:

Reporting Threshold for Onshore Petroleum and Natural Gas Production

EPA is taking comment on whether a 10,000 mtCO₂e threshold for onshore petroleum and natural gas production would be more appropriate. In addition to seeking comment on the proposed threshold for onshore production, EPA more broadly is seeking comment on the selection of the threshold for all segments of the petroleum and natural gas industry.

BP supports the consistent use of a 25,000 tonnes CO₂e threshold.

Response: Please see response to comment: EPA-HQ-OAR-2009-0923-0051-1.

2.3 DE MINIMIS REPORTING

Comment Number: EPA-HQ-OAR-2009-0923-3524-2

Organization: Chesapeake Energy Corporation

Commenter: Grover Campbell

Comment Excerpt Text:

EPA has expressed its desire to maintain "an appropriate balance [in the MRR] between data accuracy and cost." 74 Fed. Reg. at 56,280 . However, if EPA determines that upstream production sites should be aggregated under Subpart W, further steps should be taken to reduce the impact on small upstream production sites. The sheer number of production sites - many of which are small - will drive up the overall cost of complying with the MRR. To strike the "appropriate balance between data accuracy and cost," EPA should : "

- Exempt very small upstream production sites with de minimis GHG emissions from Subpart W. De minimis emissions should be defined as (1) well sites with less than 60 MSCFD of natural gas production and less than 5 BOPD condensate production and (2) oil stripper wells

producing less than 10 BOPD. Using calculations provided in the API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry ("the Compendium"), Chesapeake determined that the emissions from a stripper well may vary between approximately 100 tonnes per year to 350 tonnes per year, depending on the equipment used and whether there is condensate production. These emission rates are so low that the burden that would be imposed in collecting this data from such small sources will far exceed the minimal value to be gained by accounting for these emissions in the inventory. See 74 Fed. Reg. at 56,291 (Oct. 30, 2009) (noting that "the reporting of [these] GHG emissions is unreasonable given the cost of monitoring and the relative level of GHG emissions."). "

- Allow the use of the Compendium as a screening method for upstream production sites with limited GHG emissions. Sites with emissions below 3,000 tpy have emissions that are too low to require measurement, and the use of the Compendium is sufficient to provide reliable and accurate emissions data in a streamlined manner. Upstream production sites with CO₂e emissions below 3,000 tpy should be allowed to report those emissions as calculated using the Compendium to reduce their reporting burden . The Compendium was initially released in April 2001 .⁵³ The 2009 version - the third release of the Compendium - "represents industry best practices for estimating GHG emissions" and the "latest information available" on emission factors and methodologies. *Id.* at ii, 1-2. The Compendium has been regularly modified based upon comments received during "industry conferences, workshops, and focused outreach to other protocol development organizations, particularly those used by the oil and natural gas industry in other regions of the world." *Id.* at 1-2. It has also been subject to "broad peer review" by governmental agencies, non-governmental organizations, and industry associations . *Id.* at ii . The Compendium is widely understood throughout industry and EPA to provide "consistent, standardized methodologies for estimating GHG emissions. . . ." *Id.* at 1-1 . In fact, numerous protocols throughout the world either allow or require the use of the Compendium when reporting GHG emissions.⁵⁴ It was "designed to strike a balance between flexibility and cost-effectiveness in accounting and reporting, and the need for consistency and accuracy in the reported results." Karin Ritter et al., *The Road to Consistency in Greenhouse Gas Emissions Estimation and Reporting for the Oil & Gas Industry Sector*, Paper No. 04-A-583-AWMA, at 2 (Feb. 26, 2004). Knowing that the Compendium represents over a decade of knowledge that has been widely peer-reviewed and regularly updated would enable companies to certify the accuracy and integrity of their emissions data with great confidence. Moreover, if EPA allows production sites to use the Compendium, the data gathered may be accurately compared because the uncertainty in the data should be uniform. In contrast, if direct measurement methods are used, the variability and uncertainty of the data submitted will likely reduce EPA's ability to compare data with confidence. See Section 4, *infra*.

⁵³ API, Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry at 1-2 (Aug. 2009)

⁵⁴ Australian Government, Department of Climate Change, Technical Guidelines for the estimation of greenhouse gas emissions by facilities in Australia, ch. 3 (June 2009); Answers to Frequently Asked Questions on Greenhouse Gas Emissions Monitoring and Reporting under the EU Emissions Trading System Pursuant Directive 2003/87/EC, at 13 (Sept. 2007); Government of Alberta, Technical Guidance for Completing Specified Gas Baseline Emission Intensity Applications, at 30 (Feb. 2010).

- In contrast, production sites with CO₂e emissions above 3,000 tpy could reasonably be required to conduct more rigorous calculations by utilizing the methods proposed by EPA calculate and report their emissions (as otherwise amended by the additional comments provided by Chesapeake herein). If EPA mandates aggregation of emissions through the establishment of reporting areas, the emissions calculated according to this screening method would need to be "rolled up" into a single value for each threshold reporting area.

Response: Please also see the response to EPA-HQ-OAR-2009-0923-1018-2 for a discussion of a de minimis approach. With regard to marginal wells, please see the response to EPA-HQ-OAR-2009-0923-0053-1. Concerning streamlining emissions estimating methods and requiring the largest-emitting upstream production sites to employ more rigorous emissions estimating methods, please see the response to EPA-HQ-OAR-2009-0923-1031-18.

EPA disagrees that the API Compendium provides adequate methodologies to monitor all onshore petroleum and natural gas emissions covered under subpart W, please see the response to EPA-HQ-OAR-2009-0923-3524-4.

Comment Number: EPA-HQ-OAR-2009-0923-1040-4

Organization: American Exploration & Production Council

Commenter: V. Bruce Thompson

Comment Excerpt Text:

If upstream production sites are aggregated, graduated requirements should be established.

If EPA requires aggregation of upstream production sites, it should take reasonable steps to mitigate the adverse financial burden to industry, especially very small operators. EPA should:

- Exempt very small upstream production sites with de minimis GHG emissions from Subpart W. This could be accomplished using well defined production screening thresholds such as: (1) well sites with less than 60 MSCFD of natural gas production and less than 5 BOPD condensate production and (2) oil stripper wells producing less than 10 BOPD.
- Provide streamlined emissions estimating methods for upstream production sites with limited GHG emissions. For these sites, the API Compendium provides a reliable, accurate, and streamlined method of estimating emissions. Upstream production sites with CO₂e emissions at or below 3,000 tpy based on the API Compendium would report those emissions as calculated.
- Require the largest-emitting upstream production sites to employ more rigorous emissions estimating methods. Upstream production sites with CO₂e emissions above 3,000 tpy based on the API Compendium would use the methods proposed by EPA (as amended according to the additional comments provided below).

As recommended in Comment 1, above, emissions calculated according to the procedures described above would be "rolled up" into a single value for each reporting area.

Response: Regarding the aggregation of sources, please see the response to EPA-HQ-OAR-2009-0923-1031-16. For de minimis issues, please see the response to EPA-HQ-OAR-2009-0923-1018-2. Concerning streamlining emissions estimating methods and requiring the largest-emitting upstream production sites to employ more rigorous emissions estimating methods, please see the response to EPA-HQ-OAR-2009-0923-1031-18.

Comment Number: EPA-HQ-OAR-2009-0923-1018-9

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Pre-amble, pages 31-35, "EPA considered a range of possible options for reporting emissions from onshore petroleum and natural gas facilities. Although several options for defining the facility were considered and described below, EPA has determined that only two of the options are feasible: basin-level reporting and field-level reporting. For this supplemental proposed rulemaking, EPA proposes that emissions from onshore petroleum and natural gas production be reported at the basin level."

- As stated previously CAPP does not support the aggregation of emissions at the field or basin level. This practice increases the reporting burden with little improvement of reported data quality. The facility threshold for reporting should be set low enough to capture all the emissions of interest to the regulating entity. Additionally, special facility definitions should not be created for one sector which either increases or decreases the level of reporting required; carbon should be treated equally across all sectors. By implementing a basin level approach with a threshold of 25,000 metric tones CO₂e, essentially 100% of emissions from onshore oil and gas operations are included, which is not consistent with the coverage for other sectors. ·

- CAPP strongly recommends that a de minimis approach be taken if proceeding with field or basin level reporting for the upstream oil and gas sector.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1005-2 for a discussion of basin-level reporting. Please also see the response to EPA-HQ-OAR-2009-0923-1018-2 for a discussion of a de minimis approach.

Comment Number: EPA-HQ-OAR-2009-0923-1018-2

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

Although the EPA has already considered adding a de minimis clause and determined that it wasn't required because the threshold for reporting should remove the smaller difficult to quantify emission sources, CAPP recommends EPA reconsider implementing a de minimis clause. Due to the basin level reporting approach, many small and difficult to quantify sources have been included. The inclusion of these sources not only significantly increases the reporting burden for the sector, but also increases the potential inaccuracy of the emissions reported and may provide misleading data.

Response: EPA disagrees with the comment to implement a de minimis clause into today's final rule. Please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98)preamble Section II.K for further discussion on this issue. However, to reduce burden, in today's final rule EPA has adopted the use of various methodologies including the use of emissions factors to facilitate the estimation of emissions from some sources, including: vented

GHG emissions from onshore petroleum and natural gas production tanks with less than 10 barrels per day separator and well production throughput; glycol dehydrators with throughput less than 0.4 million cubic feet per day; onshore production compressors; onshore production equipment leaks determined with major equipment counts. Please see Section II.E, of the preamble for today's final rule and EPA-HQ-OAR-2009-0923 for memos "Equipment Threshold for Tanks," "Equipment Threshold for Dehydrators," "Compressor Modes and Threshold," and "Equipment-Level Population Emission Factors for Onshore Production." In addition to these changes, EPA plans to develop screening tools to help facilities in each segment of the petroleum and natural gas industry determine whether they would be subject to reporting. For further details about the screening tool, please review the content under "Applicability" in Section II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1026-2

Organization: Dominion Resources Services. Inc.

Commenter: Pamela Faggert

Comment Excerpt Text:

The re-proposal does not recognize the fact that in the natural gas sectors there are de minimis emissions sources. By broadly defining the natural gas sectors, valuable resources will be spent inventorying and calculating emissions from operating units that are not a significant source of greenhouse gas emissions. We believe this approach will not add any further accuracy to the inventory when multiplied by an emissions factor which is not necessarily representative of the operation of that source.

Response: EPA disagrees with this comment. Please see the response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1026-4

Organization: Dominion Resources Services. Inc.

Commenter: Pamela Faggert

Comment Excerpt Text:

The natural gas production sector is defined in § 98.230(a)(2) as "all structures associated with wells, piping, and portable... equipment used in the production, extraction, recovery, lifting, stabilization, separation or treating of petroleum and/or natural gas." This definition and the associated unit operations that would be required to be inventoried and reported would include all wells, with no consideration of low emitting sources within this sector such as low-production wells and small tanks that are equipped only with safety relief valves. Furthermore, greenhouse emissions from wells are to include emissions of both methane and carbon dioxide. While all natural gas wells have, by definition, significant concentrations of methane, not all basins have significant concentrations of carbon dioxide. We request that reporting exemption thresholds be established for the following de minimis emission units to allow limited resources to be focused on areas where emissions are not de minimis:

- low production wells that have annual production rates of less than 460,000 mcf⁵⁵; this value is based on an equivalent threshold of 25,000 tpy CO₂- equivalent,
- CO₂ emissions from the natural gas production wellhead when the CO₂ content of the gas in that particular basin is less than 1% CO₂⁵⁶.
- tanks that are not equipped with atmospheric vents or that are less than 250 gallons/day throughput.

Response: EPA disagrees with de minimis reporting. Please see response to comment EPA-HQ-OAR-2009-0923-1018-2. Low production well data must be reported if said well is part of a facility over the threshold, but EPA has revised several methodologies including using emission factors for onshore production tanks with less than 10 barrels per day separator and well production throughput, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1031-17

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment Excerpt Text:

Exempt very small upstream production sites with de minimis GHG emissions from Subpart W. This could be accomplished using well defined production screening thresholds such as: (1) well sites with less than 60 MSCFD of natural gas production and less than 5 BOPD condensate production and (2) oil stripper wells producing less than 10 BOPD.

Response: EPA disagrees with de minimis reporting, please see response to comment EPA-HQ-OAR-2009-0923-1018-2. Low production well data must be reported if said well is part of a facility over the threshold, but EPA has revised several methodologies including using emission factors for onshore production tanks with less than 10 barrels per day separator and well production throughput, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1061-7

Organization: Texas Pipeline Association

Commenter: Patrick J. Nugent

Comment Excerpt Text:

Gathering lines from booster stations to gas processing plants should be excluded from the rule's coverage. EPA proposes to exclude reporting of fugitive emissions from natural gas pipeline segments between compressor stations "due to the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly:" 75 Fed. Reg. 18616. The same may be said about emissions from gathering lines: emissions tend to be

⁵⁵ 460,000 mcf is equivalent to 25,000 tpy CO₂ equivalent.

⁵⁶ 1% CO₂ in a natural gas stream is nominally equivalent to less than 0.05% on a CO₂ equivalent basis.

widely dispersed and when found are quickly addressed. It would be extremely difficult and costly for operators to have to measure emissions from gathering lines, as operators would have to perform counts on hundreds of thousands of valve locations as well as other pipeline components. The difficulty of measuring dispersed emissions from lengthy pipeline segments, combined with the fact that operators have a significant economic incentive to repair pipeline leaks, properly led EPA to exclude pipeline emissions in the transmission context. Because the same reasoning applies with respect to gathering pipelines, emissions from gathering pipelines should also be excluded from the rule's reporting requirements.

Response: Gathering lines and boosting stations are not included in today's final rule. Please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1074-26

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment on 98.232(c)(9):

WBIH strongly requests the exclusion of fugitive emissions reporting for natural gas gathering pipelines. Natural gas gathering lines are located underground. Significant leaks on gathering pipelines are detected and fixed promptly. EPA stated that it is not proposing to include reporting of fugitive emissions from the natural gas transmission lines "due to the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly." The same is true for natural gas gathering lines

Response: Gathering lines and boosting stations are not included in today's final rule. Please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1074-27

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment on 98.232(d)(8):

WBIH strongly requests the exclusion of fugitive emissions reporting for natural gas gathering pipelines. Natural gas gathering lines are located underground. Significant leaks on gathering pipelines are detected and fixed promptly. EPA stated that it is not proposing to include reporting of fugitive emissions from the natural gas transmission lines "due to the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly." The same is true for natural gas gathering lines

Response: Gathering lines and boosting stations are not included in today's final rule. Please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1074-5

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

75 FR 18616: C. Definition of the Source Category, Petroleum and Natural Gas Pipelines

Comment: WBIH strongly requests the exclusion of fugitive emissions reporting for natural gas gathering pipelines.

Natural gas gathering lines are located underground. Significant leaks on gathering pipelines are detected and fixed promptly. EPA stated that it is not proposing to include reporting of fugitive emissions from the natural gas transmission lines "due to the dispersed nature of the fugitive emissions, and the fact that once fugitives are found, the emissions are generally addressed quickly." The same is true for natural gas gathering lines

Response: Gathering lines and boosting stations are not included in today's final rule. Please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1080-34

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

The definition should also state a de minimis level of 2,500 miles of gathering line.

Response: Gathering lines and boosting stations are not included in today's final rule. Please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1082-11

Organization: MidAmerican Energy Holdings Company

Commenter:

Comment Excerpt Text:

EPA is seeking comment on the proposed threshold for onshore production; EPA more broadly is seeking comment on the selection of the threshold for all segments of the petroleum and natural gas industry. (page 56)

MidAmerican supports keeping the threshold at 25,000 metric tons for the natural gas industry.

However, as acknowledged by EPA, natural gas transmission and distribution systems do not fit well within the standard definition of “facility.” The requirement to monitor and calculate leaks from very small equipment or components seems to suggest that EPA exclude de minimis sources of emissions.

Response: EPA disagrees with the comment. Please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1100-2

Organization: Linn Energy

Commenter: Paul M. Espenan

Comment Excerpt Text:

Comment 1: LINN Energy strongly believes that if upstream production sites are aggregated, graduated requirements should be established so the regulatory burden matches the potential emissions.

To mitigate the adverse financial impact to operators, especially very small operators, of stripper wells EPA should:

- Exempt very small upstream production sites with de minimis GHG emissions from Subpart W. This could be accomplished using well-defined production screening thresholds such as: (1) well sites with less than 60 MSCFD of natural gas production and less than 5 BOPD condensate production and (2) oil stripper wells producing less than 10 BOPD.

Response: EPA disagrees with this comment, please see the response to comment EPA-HQ-OAR-2009-0923-1031-17.

Comment Number: EPA-HQ-OAR-2009-0923-1173-13

Organization: Resolute Energy Corporation

Commenter: Patrick E. Flynn

Comment Excerpt Text:

De Minimis Reporting Level

Resolute Comments:

Resolute urges EPA to adopt a "de minimis" reporting level for use in Proposed Subpart W. A de minimis approach is featured in most GHG reporting programs in existence today, as they recognize that many complex facilities have a myriad of small sources of emissions, in addition to their larger sources. A de minimis approach will lessen the burden on all onshore oil and natural gas producers, who will spend significant resources quantifying a small amount of emissions for many remote and insignificant sources of GHG emissions. One option would be to design the de minimis reporting level so that once the reporting threshold is triggered, Proposed

Subpart W would allow up to 5% of the emissions to be declared as "de minimis," allowing simplified emission estimation methods, such as using engineering assessment with no monitoring requirements, for demonstrating compliance with this emission level. Another alternative would be to simply exempt certain sources that are determined to be minimal sources of greenhouse gas emissions. Resolute proposes that de minimis emission sources include:

- Low and no bleed/pilot operated pneumatic controllers.
- Pneumatic valve actuators.
- Tanks with very low CH₄ content, e.g. < 10% CH₄.
- Normal (component) fugitives from process streams where the CH₄ content is below 10%.
- Miscellaneous heaters and other similar equipment with an aggregate heat input capacity of less than 10 MMBtu/hr.
- Tanks or dehydrators with VRU controls installed.
- Non-pneumatic pump seal leaks where the fluid being pumped is less than 10% CH₄ or less than 25% CO₂.
- All emission sources associated with the handling of stabilized crude.

Response: EPA disagrees with de minimis reporting, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1173-5

Organization: Resolute Energy Corporation

Commenter: Patrick E. Flynn

Comment Excerpt Text:

EP A should adopt a "de minimis" reporting level for use in Proposed Subpart W.

Response: EPA disagrees with de minimis reporting, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1198-3

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment Excerpt Text:

Not only is the reporting of emissions from de minimis sources extremely burdensome, in many cases it would be nearly, if not completely, impossible.

Response: EPA disagrees with de minimis reporting, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1198-6

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment Excerpt Text:

Because of the nature of the industry in this state, it would be extremely difficult, if not impossible, to locate each of these de minimis sources by facility owner, as many companies use another company's gathering line or production or processing equipment. Historically, Appalachian natural gas reserves have constituted a mature market that mainly relies on marginal wells for its supply with West Virginia wells producing an average 15 MCF per day (Independent Oil and Gas Association of West Virginia, Comments at Federal Energy Regulatory Commission Hearing RM94-4-000) and an average of 12 MCF per day in Ohio (Ohio Oil and Gas Association Bulletin 68-70, October, 1993). This is compared to a national average of 182 MCF per day in 1995. As a result, in this area the infrastructure required to gather and transport natural gas is significantly different than that in the western states with several times more compressor engines, but with significantly lower capacity (horsepower). This is further complicated by the diverse ownership and operation of these assets, i.e. due to the large number of wells and the mountainous terrain, it is not unusual for a small local company to manage gathering in a county or part of a county. Ultimately, all of the gathered gas in West Virginia is processed at one of many processing facilities; but these facilities support a network of almost 50,000 wells in the state. This rule, if promulgated as written, would create a situation where all engines on the gathering network, most of which would not otherwise even approach an emissions threshold that would require reporting; would be required to be monitored and reported annually as part of the natural gas processing sector.

Response: Gathering lines and boosting stations are not included in today's final rule. Please see Section II.F of the preamble. EPA disagrees with the comment regarding de minimis, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1202-7

Organization: Enterprise Products

Commenter: Rodney Sartor

Comment Excerpt Text:

Without the inclusion of a de minimis threshold or screening mechanism, considerable resources would be spent estimating and measuring emissions from facilities that would more than likely not be required to report. The inclusion of Subpart W could quadruple the number of facilities for monitoring, increasing the number of monitoring points into the thousands. This increase in facility monitoring requirements would impose an undue hardship while the resource allocation to complete such an evaluation in an efficient and cost effective manner would be improbable and potentially impossible.

Response: EPA agrees with the comment regarding a screening tool. EPA intends to provide screening tools, please see Section II.F of the preamble in today's final rule. EPA disagrees with comments regarding de minimis. Please see the response to comment EPA-HQ-OAR-2009-0923-1018-2. EPA disagrees with the comment on cost, please see the preamble Section III and the EIA Section 5 in EPA-HQ-OAR-2009-0923.

Comment Number: EPA-HQ-OAR-2009-0923-1202-8

Organization: Enterprise Products

Commenter: Rodney Sartor

Comment Excerpt Text:

Facility Screening - Enterprise proposes a de minimis threshold or screening mechanism be incorporated into Subpart W, similar to the 30 MMBtu/hr threshold under Subpart C, that allows for determination of applicability, without having to collect all data required by Subpart W. EPA should consider correlating the reporting applicability for Subpart C with applicability of Subpart W requirements. For example, if a facility is required to report under Subpart C, it would also be required to evaluate emissions under Subpart W. Additionally, because of the variable nature of the sources to be reported under Subpart W, determination of applicability is almost impossible without conducting a full scale analysis of each facility.

Response: EPA agrees with the comment regarding a screening tool, please see Section II.F of the preamble in today's final rule. EPA disagrees with comments regarding de minimus. Please refer to the response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1206-40

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

In addition, this section should establish a de minimis threshold below which the unit is excluded from reporting or is allowed to use API Compendium to estimate emissions. The same annual calculation method is prescribed regardless of the tank's throughput, for example a tank that fills at a rate of 1 barrel/day versus a tank that fills at a rate of 100 barrels/day. In this particular example, the prescribed method requires analysis of the separator liquid and collection of numerous operating parameters. The liquid analysis is expensive and often the sample is difficult or impossible to collect, even with higher liquid production rates, and should not be required for tanks with minimal throughput. Across the natural gas industry, there are thousands of tanks associated with very low liquid production rates and, therefore, minimal GHG emissions. GPA recommends that tanks with a throughput of less than 5 barrels/day be excluded from reporting under Subpart W. If an exclusion cannot be provided, GPA recommends tanks below the 5 barrel/day threshold be allowed to use the appropriate emission factor from the API Compendium in place of conducting modeling using process simulations.

Response: EPA disagrees with de minimis reporting, please see response to comment EPA-HQ-OAR-2009-0923-1018-2. However, EPA has revised several methodologies to reduce burden including using emission factors for onshore production tanks with less than 10 barrels per day separator and well production throughput, please see response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1297-2

Organization: Southern Ute Growth Fund

Commenter: Lynn Woomeer

Comment Excerpt Text:

Additionally, as proposed, the approach requires aggregation of production sites. A gradual approach should be implemented to lessen resource constraints, or financial burdens, particularly for small oil and gas operators, since even the smallest facility will need to determine whether they would have to report. The setting of a de minimis level to limit applicability for certain operations should also be considered in this approach.

Response: EPA agrees with the comment regarding a screening tool. Please refer to Section II.F of the preamble in today's final rule. EPA disagrees with comments regarding de minimis. Please refer to the response to comment EPA-HQ-OAR-2009-0923-1018-2.

Comment Number: EPA-HQ-OAR-2009-0923-1298-75

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

De Minimis Sources: IPAMS requests that EPA adopt a "de minimis" reporting level for use in Subpart W. A de minimis approach is featured in most GHG emissions reporting programs in existence today, as they recognize that many complex facilities have a myriad of small emission sources, in addition to their larger sources. A de minimis approach would lessen the burden on all onshore oil and natural gas producers, who otherwise under the proposed rule would have spent significant resources quantifying a very small amount of emissions for many remote and insignificant GHG emission sources. The de minimis approach would simply exempt certain source types that are determined to have minimal GHG emissions. IPAMS proposes that de minimis emission sources include:

- Low and no bleed/pilot operated pneumatic controllers
- Pneumatic valve actuators
- Tanks with very low CH₄ content (e.g. less than 10% CH₄)
- Normal (component) fugitives from process streams where the CH₄ content is less than 10%
- Miscellaneous heaters and other similar equipment with an aggregate heat input capacity of less than 10 MMBtu/hr
- Tanks or dehydrators with VRU controls installed
- Non-pneumatic pump seal leaks where the fluid being pumped is less than 10% CH₄ or less than 25% CO₂
- All emission sources associated with the handling of stabilized crude.

Response: Please see the response to comment EPA-HQ-OAR-2009-0923-1173-13.

VOLUME 3: GENERAL MONITORING APPROACH, THE NEED FOR DETAILED REPORTING, AND OTHER GENERAL RATIONALE COMMENTS

3.0 GENERAL MONITORING APPROACH, THE NEED FOR DETAILED REPORTING, AND OTHER GENERAL RATIONALE COMMENTS

No Comments Received.

3.1 RATIONALE FOR GENERAL MONITORING APPROACH

Comment Number: EPA-HQ-OAR-2009-0923-1016-38

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment: LNG Storage and Import Facilities Should be Excluded from Subpart W Because the EPA Has Not Sufficiently Demonstrated That LNG Facilities Contribute Substantially to GHG Fugitive Emissions.

The preamble and the background documents prepared for Subpart W indicate that the EPA has not conducted any specific fugitive leak studies at LNG storage or import facilities, although such studies have been conducted at natural gas processing plants and natural gas transmission compressor stations. Furthermore, the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923) contains a number of inaccuracies pertaining to LNG facilities, including types and levels of equipment (pumps, compressors, etc.) that are non-existent or are installed in far smaller numbers. If EPA had studied LNG operations, the agency would have observed that these facilities are operated and maintained at a very high level of competency and respect for the environment. These facilities by design and regulation under 49 C.F.R. Part 193 and NFPA 59A have installed gas/leak detection equipment that performs continuous monitoring of field conditions and upon detection is required to alarm in the field and at an attended control room at 25% of the lower flammable limit of methane, or 1% methane in air. Furthermore, these facilities are required to have trained and qualified operating personnel who monitor the installed detection systems and conduct regular facility inspections several times each day, including process post-cool down field checks to confirm that system integrity has been maintained. Due to notification by the monitoring system to the attended control room, if leakage does occur, operating personnel are alerted immediately and the leak is quickly addressed by adjusting the equipment or stopping the process, and therefore significant fugitive emissions are avoided.

Response: EPA recognizes that LNG Storage and Import/Export facilities are operated at a high level of efficiency. However, explosive level leak detection equipment targets safety concerns rather than GHG leak detection and reporting quantification and therefore is not relevant to the data collection necessary under today's final rule. Please see EPA-HQ-OAR-2009-0923-1026-8 for additional information.

The lack of specific equipment leak studies at LNG facilities is a reason that EPA has concluded that it is important to determine estimated emissions levels based on consistent standards of monitoring and reporting for this sector. This is also consistent with the approach in the other subparts of the GHG reporting program and other CAA activities when EPA is collecting data on a sector.

Comment Number: EPA-HQ-OAR-2009-0923-1031-16

Organization: Anadarko Petroleum Corporation

Commenter: William W. (Bill) Grygar

Comment: If upstream production sites are aggregated, graduated requirements should be established. If EPA requires aggregation of upstream production sites, it should take reasonable steps to mitigate the adverse financial burden to industry, especially very small operators.

Response: EPA recognizes this concern and will allow the use of Best Available Monitoring Methods for specified time periods if appropriate conditions are met. Moreover, EPA has made modifications which will mitigate burden. These are discussed in Section II.E of the preamble in today's final rule. Information on the impact on small businesses can be located in Section III.D of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1059-6

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment: Furthermore, fugitive emissions from the Subpart W Rule sources do not come from large individual sources. The Subpart W Rule source fugitive emissions are from a compilation of innumerable small sources that would have highly inaccurate emissions estimations applied with no direct emissions monitoring. MDU believes that the inaccurate estimation of fugitive emissions from these sources would not be reliable for use in informing the EPA or U.S. Congress of future climate change or GHG legislation, policies and programs.

Response: EPA disagrees with the comment. EPA's approach to equipment leak emissions monitoring and estimation in today's final rule is crafted to provide more information regarding equipment leaks from specific sources that in some cases are currently not well understood. It is important to gain a better understanding of activity data from these sources, for example the number of leaks found, which is not currently known. Knowing the number of leaking equipment provides a much more credible basis for policy decisions.

Comment Number: EPA-HQ-OAR-2009-0923-1065-1

Organization: The Clean Energy Group

Commenter: Michael Bradley

Comment: The Clean Energy Group is generally supportive of the proposed Subpart W-

Petroleum and Natural Gas Systems. While the initial proposal in 2009 focused on comprehensive leak detection and direct measurement, this proposal includes direct measurement of emissions for only the most significant emissions sources. This approach is more reasonable given the administrative and cost burdens associated with direct measurement.

Response: EPA reviewed this comment and the commenter's support for today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1155-11

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment: Reporting Accuracy/Database Construction

EPA's proposed MRR does not require direct emission measurement for some equipment; however, some Operators may have installed metering or emission measurement devices in response to their own voluntary corporate emissions tracking efforts, or in anticipation of upcoming state or jurisdictional rulemaking. Companies that have invested in more sophisticated emissions tracking and reporting systems should be required to report that data, as long as that data is at least as accurate as the method EPA establishes in the final Subpart W MMR. The most accurate emission inventory should be reported to EPA. Operators should not be allowed to maintain two different sets of GHG emission inventories. For example, an Operator that has invested in metering should be required to report more accurate metered volumes, even if the final Subpart W MRR only requires the use of less accurate emission factors. This will streamline emission reporting for Operators that have already invested in more sophisticated emission estimating systems, and will not penalize them for developing rigorous emissions assessment systems. Requiring the Operator to report the most accurate emission data will be an important consideration for EPA when it develops the MRR database, because EPA will need to include data entry fields for data required by the MRR, and will also need to provide data entry fields that require the Operator to provide more accurate data whenever available. We do not want the Operator to be constrained from reporting more accurate data due to a database limitation. Creation of a more flexible and sophisticated EPA emissions database will provide the Operator with a single reporting tool where it can report one set of data that can be used by multiple jurisdictions, and will provide EPA with improved data accuracy. Moreover, a rigorous, well-designed emissions rule will ensure that all emissions data are based on the best available information using rigorous data collection.

Response: EPA does not agree that companies that have invested in more sophisticated emissions tracking and reporting systems should be required to report that data. EPA chose methodologies for data collection from specific emissions sources in order to maintain data quality and consistency. Data collection consistency adds enforcement clarity for EPA and enforcement certainty for reporters. While some reporters requested flexibility to use more sophisticated meters and measurement tools, the use of this equipment must comply with the specific data collection methodologies as prescribed in the rule.

The methodologies prescribed in the rule in a number of cases allow direct measurement alternatives; in other cases EPA has not defined a direct measurement procedure since the

requirements to develop a consistent methodology were judged to either potentially slow down the rule development process, or provide minimal data quality improvement.

Comment Number: EPA-HQ-OAR-2009-0923-1155-32

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment: EPA is seeking comment on how to avoid under-reporting of emissions due to voluntary “unofficial” surveys and subsequent repair exercises performed ahead of the required reporting surveys for this proposed rule.⁵⁷ In general, we support survey and repair activities as valuable tools to reduce fugitive emissions from the oil and gas sector. Such tools should be embraced and not discouraged as a matter of policy. Further, we question the presumption that post-repair emission reporting always qualifies as “under-reporting” if what is being reported are the actual emissions from a facility at a point in time. However, we do share EPA’s concern that facilities may attempt to fix emissions just before taking reporting surveys, and so genuinely engage in under-reporting.

According to the EPA’s discussion in the preamble to the proposed rule, “[t]he potential monitoring method does not preclude any program from detecting and repairing fugitive emissions just prior to the official detection, measurement, and reporting of emissions in which case the repaired emissions may not get reported.” To the extent EPA is concerned that facilities will tend to release more fugitive emissions throughout the year than what is being reported under the mandatory framework, the agency should investigate strengthening and applying enhanced fugitive emissions monitoring requirements to oil and gas facilities subject to the rule. Since fugitive emissions are a continuously emerging emissions source within a facility, the goal of the reporting program should be two fold: 1) accurately calculating emissions and 2) facilitating emissions reductions. Further, since emissions reductions can be gained through requiring semi-annual inspections or re-inspection requirements for components found to be leaking, EPA should considering using these tools rather than preventing pre-emissions inspection repair.

Response: EPA considered options such as requiring semi-annual inspections, or requiring re-inspections of equipment found leaking. These options would increase overall burden of rule reporting. EPA has determined that the ongoing awareness of leaks through leak identification efforts (regardless of when they occur) stimulated by today’s final rule reporting requirements will provide emissions inventory awareness without significant additional burden. In addition, the use of multiple surveys will not impact overall data quality as equipment leaks can begin at odd times. Listing of an equipment leak may not exist in an unofficial survey and then appear in the official survey and therefore the statistically random occurrences of equipment leak emissions should balance between repairs done during the year and equipment leaks found during the official survey.

⁵⁷ Id. at 16,535.

Comment Number: EPA-HQ-OAR-2009-0923-1206-49

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment: Fourth, to further complicate the required reporting, EPA has required that the measurements be conducted three times for each unit – once while operating, once while in standby, and once when depressurized. Not only does this triple the already onerous resource requirements to collect the data, but requires an operator to depressurize a compressor and create GHG emissions (via compressor blowdowns) just to take a third measurement which will likely be a “zero” reading unless a valve has malfunctioned.

Response: Please reference Section II.F of the preamble in today’s final rule and response to comment EPA-HQ-OAR-2009-0923-0055-16, which discusses this issue. EPA never intended operators to conduct measurements three times per year and clarifications have been made to today’s final rule to address this concern.

Comment Number: EPA-HQ-OAR-2009-0923-1306-22

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment: Shared Facilities

DTE Energy seeks clarification on how to treat situations in which a change of gas ownership occurs and ownership of the M&R station is distinctly separated at the custody transfer point. DTE Energy requests that EPA clarify if and/or how the natural gas distribution company would have to perform leak calculations for the portion of the facility not owned by the distribution company. Such a situation can occur with natural gas producers, pipeline companies, other distribution companies, and large industrial customers.

Response: Ownership of gas does not determine who is required to report under today’s final rule. The owner/operator of the facility is the entity required to report. If, for example, DTE Energy is the owner/operator of an M&R station, regardless of the ownership of the gas flowing through the M&R station, then DTE energy would be the entity obligated to report. If another entity, for example a large industrial customer, owns or operates the M&R station, then that industrial customer must factor in the M&R station into their threshold determination and if the reporter triggers the 25,000 tonnes CO₂e in combined emissions threshold under all subparts listed in Section 98.2(a)(2) of the Mandatory Reporting Rule, said entity would be required to report the M&R station along with all other applicable emissions sources. Further, it is up to the owner(s) and operator(s) to designate only one Designated Representative to report for a covered facility. For further details about the role of the Designated Representative, please see the response to EPA-HQ-OAR-2009-0923-1024-16.

3.1.1 SEGREGATE BY SOURCE TYPE (TANKS, COMPRESSORS, ETC.)

No Comments Received.

3.2 NEED FOR DETAILED DATA COLLECTION

Comment Number: EPA-HQ-OAR-2009-0923-1011-52

Organization: El Paso Corporation

Commenter: Fiji George

Comment: Section 98.236(c) Data reporting requirements

El Paso has been voluntarily quantifying and reporting its greenhouse gas emissions since 2006 and was the first natural gas company to certify its emissions inventory under the California Climate Action Registry (CCAR). Industry standard practices for compiling GHG inventories for natural gas operations rely on available operational data, engineering estimates, and counts of major equipment. It is not standard industry practice to account for every fugitive component, to maintain manufacturer information for every pneumatic device, to meter flow rates for all vented and flared streams, or to analyze pressurized compositions or dissolved CO₂ from all produced liquids.

Furthermore, there seems to be multiple items required to be reported that are not relevant to the emission estimates but will increase the compliance burden and cost for the reporters. Therefore, El Paso suggests eliminating certain reporting requirements as explained below.

1. For tank emissions identified using optical gas imaging instrument

Per Section 98.236(c)(11), the requirement is to report the following:

- (i) Immediate upstream separator temperature and pressure.
- (ii) Sales oil API gravity.
- (iii) Tank capacity in barrels.
- (iv) Tank throughput in barrels.

The above items have no relevance to the emission estimations since these emissions will be directly measured. This information cannot be used to derive emission factors as the emissions do not depend on the above. The API gravity determination may incur additional cost for the reporters if this item is not readily available.

2. Compressor throughput

The proposed rule requires reporting of the total throughput for centrifugal compressors with wet seal degassing vents and reciprocating compressor rod packing report pursuant to Sections 98.236(c)(17)(iii) and (18)(i), respectively. Again, this will increase the reporting burden as the environmental systems usually do not contain this information and new process will have to be established to make this information available for emission reporting. This will also significantly

increase the scope of information subject to certification by the Designated Representative.

3. Compressor Component Counts

Section 98.236(c)(19)(i) requires a component count for each fugitive emissions source. It's not quite clear if this means a full component count of all components in natural gas service, or a list of all leaking components. If a full component count is intended, this adds a substantial amount of work to the surveys. A half-day visit to a facility or reporting area to perform a survey(s) could increase to a 3 day visit (or more), and thus will have significant impact on scheduling and cost. Since the proposed method is based on leaking component count and leaker emission factors, full component counts do provide any information relevant to emission estimates. Elimination of this requirement will allow more focus on accurate data collection and reporting.

4. Facility throughput

Minimum and average throughput for each operation listed in paragraphs (a)(1) through (a)(8), i.e., each facility subject to reporting, is required to be reported per 98.236(d). This information is not relevant to the emission estimations and significantly increases the reporting burden and adds to the certification burden.

Response: Based on comments received and additional EPA analysis, today's final rule identifies several alternative methodologies that, when performed, would result in reduced burden on industry while maintaining the necessary quality of data to inform policy.

With regard to reporting requirements for tank emissions, today's final rule identifies revised data reporting requirements in Section 98.236(c)(8). These revisions eliminate the need to report tank capacity, and allow reporting of ranges for API gravity and temperature and pressure. Total volume of oil from all wellhead separators must be reported, which should be information already known by the reporter. Floors have also been included with emission factors to reduce burden for separator volumes and well production below ten barrels per day (please see Section II.E of the preamble in today's final rule.)

With regard to reporting of the total throughput for compressors, today's final rule has clarified that emissions from centrifugal and reciprocating compressors do not require the installation of a permanent flow meter; use of a portable meter and port are acceptable. In addition, compressor throughput flow meters are not required; estimates of compressor flow will be sufficient for EPA's requirements. This is discussed in Section II.E of the preamble, and in the methodology portion of the rule, Section 98.233. These clarifications and modifications are a significant reduction in cost burden from the commenter's interpretation of the proposed rule requirements (See Section III.B.2 of the preamble in today's final rule).

With regard to compressor component counts, today's final rule replaces individual component counts and population based emissions factors with major equipment counts and default average component counts per primary equipment. Identification of primary equipment (compressors in this case) will result in significantly less burden to reporters than counting each component. This

is also discussed in Section II.E of the preamble, and in the methodology portion of the rule, Section 98.233.

Finally, with regard to facility throughput required to be reported per Section 98.236(d), today's final rule requires reporting of annual throughput as determined by engineering estimates based on best available data for each operation listed in paragraphs (a)(1) through (a)(8). Requirements for minimum throughput have been removed. The requirement to report estimates of annual throughput will assist EPA in evaluating relative relationship of throughput to emissions level for this subpart, and for different sources within the subpart.

Comment Number: EPA-HQ-OAR-2009-0923-1039-24

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment: Rule Principles and Natural Gas Sector Implementation Costs

These comments indicate a willingness to accept many of the measurement and monitoring methods in the Proposed Rule, with refinements required in many cases. However, INGAA remains concerned that Proposed Rule requirements exceed what is needed to furnish EPA with a reasonably complete and accurate understanding of national GHG emissions patterns, or information to support GHG policy development. With many new measurement and monitoring requirements for natural gas operations, it is apparent that Subpart W imparts significant burden on this sector.

In addition, if EPA has a predisposition to consider an anomalous event a key emission source, it is unlikely that additional data gathered through Subpart W reporting will dissuade that opinion. For example, Subpart W requires monitoring and measurement of compressor station condensate tank emissions. This requirement is likely based on voluntary reporting under the EPA Natural Gas STAR program that indicates a faulty scrubber dump valve seal can result in vented emissions through the condensate tank vent during a system malfunction. For future policy decisions, EPA may still be concerned with this potential emission source based on STAR program reporting, regardless of its prevalence (or inclusion) in Subpart W reporting. Thus, an operating practice to address valve seating would likely be considered for that policy action regardless of new data provided under Subpart W.

INGAA is concerned that measurement and monitoring requirements for natural gas operations, including anomalous events informed through voluntary participation in the Natural Gas STAR program, result in more stringent requirements for this sector. These measurement and monitoring requirements are new for the vast majority of natural gas transmission and storage operators since such programs for vented and fugitive sources are not mandated and have only been implemented at select facilities (typically on a one-time basis). INGAA respectfully submits that the approach of imposing such requirements under Subpart W could cause EPA to collect data that will ultimately not prove useful, while imposing significant cost to regulated entities.

INGAA is also concerned that universal, consistent data quality and accuracy objectives have not been implemented, resulting in regulatory inequities across affected industries. For example, Subpart W will require INGAA members to conduct a leak survey for the entire facility. This includes a subset of components in vibration and heat-cycle service that are more prone to leak over time, and many other components in non-vibration service in the compressor building and throughout the station yard that are less prone to leak. In considering the “80/20” rule, where EPA is intending to capture 80% of the emissions (e.g., see preamble discussion at 75 FR 18614), Subpart W could survey a subset of the facility and capture components that comprise the majority of fugitive emissions, rather than completing a full facility survey.

In contrast, under Subpart C, INGAA comments on the April 2009 Proposed Rule requested the use of equipment-specific methane and NO₂ emission factors for combustion exhaust as an alternative to the default factors published in the Rule. This would promote consistency with inventories already developed by operators, and would generally be expected to provide more accurate emission estimates. For example, methane emissions in combustion exhaust of a low-NO_x reciprocating engine will be higher than the default EF; thus, for facilities with reciprocating engines, the combustion methane emissions would be underestimated. In response to the comment, EPA precluded the use of more accurate EFs and required the default EFs. For some compressor stations, that inaccuracy in the facility inventory will be larger than the emissions reported from the “leak survey” of yard piping and/or the vast majority of facility components. This example demonstrates that there does not appear to be a consistent data quality or accuracy objective universally applied in defining sector-specific rule requirements. Rather, it implies that decisions are compartmentalized and are likely driven by familiarity with a particular topic, as opposed to consistently applied goals for data accuracy and emissions coverage, as well as equitable application of these principles across all industries and sources subject to the reporting rule.

INGAA recommends that EPA more clearly define data quality objectives and equitably apply such principles across all affected industry sectors. INGAA requests that EPA consider the relative burden imparted on natural gas operations under the Proposed Rule when evaluating the entirety of these comments., as well as INGAA’s comments regarding flexibility, rational phased approaches, and reasonable limits and scheduling for monitoring and measurement. Additional discussion regarding Proposed Subpart W cost is provided in the following section.

Response: Based on comments received and additional EPA analysis, today’s final rule identifies several alternative methodologies that, when performed, would result in reduced burden on industry while maintaining the necessary quality of data to inform policy. Please see response to comment EPA-HQ-OAR-2009-0923-1011-52 for additional information.

EPA does not agree with the comments regarding scrubber dump valves. EPA intends to collect information from emissions sources that are significant. An emissions source cannot be excluded just because it is anomalous; such a notion would essentially eliminate all fugitive emissions from reporting, since they are an anomaly and not an intentional practice. EPA through its Natural Gas STAR program has determined that the sticking of dump valves is a problem that occurs throughout the oil and gas industry, across various segments where compressor scrubbers are in operation. In addition, such issues have known to result in large volumes of gas loss.

Hence, EPA, through today's final rule, wants to determine the extent of such occurrences and the potential gas lost from this source. Second, the very reason for collecting information on dump valve malfunction is so that EPA can accurately inform policy. In fact, EPA contends that if such data is not collected and only data from Natural Gas STAR is relied on then future policy could be skewed due to limited data availability. Thus the commenter notion of EPA disregarding data collected through today's final rule is incorrect. Please refer to the rulemaking docket (EPA-HQ-OAR-2009-0923) under "Scrubber Dump Valves" for more information on the inclusion of scrubber dump valves in today's final rule.

Regarding the issue of the participation in the Natural Gas Star program for being the cause for greater scrutiny of this sector, the systems in today's final rule are more complex than many other sectors due to the fact that many emissions are not directly linked to combustion or throughput. Consequently monitoring and measuring can be more challenging. EPA has developed a monitoring and quantification methodology that recognizes this and keeps cost burden minimized while collecting adequate emissions and activity data to inform policy. For dump valves, EPA has allowed a basic monitoring method by first requiring the detection of an anomaly and only then requiring a measurement. Hence, only those dump valves found sticking will have to be measured. Therefore, if such occurrences are few and not indicative of a pattern then there will be very few actual measurements required and result in minimal burden.

Regarding the comments on consistent data quality and the 80/20 process, EPA used the decision process as a guide to determining what emissions source types need to report. This is discussed in more detail in the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923). In addition, EPA's assessment is that it is not prudent to further differentiate individual portions of equipment within a source (for example, high vibration and lower vibration components), since the determination of specific boundaries becomes subjective. EPA, in today's final rule, does not require measurement of emissions, only leak detection, which is a huge burden reduction. Also, EPA has provided the option of using multiple leak detection equipment that should allow reporters to use the equipment that is most economical to use.

EPA does not agree with the commenter on the use of equipment specific methane and N₂O emissions factors. First, the commenter does not provide any information to support its statement that, "for some compressor stations, that inaccuracy in the facility inventory will be larger than the emissions reported from the "leak survey" of yard piping and/or the vast majority of facility components." Hence EPA cannot directly respond to such an assertion. However, EPA's own analysis shows this claim to be incorrect. Per the threshold analysis conducted by EPA, approximately 7 percent of the total (combustion plus process) emissions reported to Subpart C and Subpart W from transmission compressor stations are due to CH₄ and N₂O emissions from combustion as opposed to 16 percent of the total emissions from equipment leaks. Second, the issue on the use of equipment specific emissions factors for CH₄ and N₂O is related to Subpart C as the transmission compression station reporter will report combustion emissions under Subpart C and not under today's final rule. Subpart C has already dealt with this issue; please see docket EPA-HQ-OAR-2008-0508 for further details on EPA response to this issue.

EPA has evaluated today's final rule based on all comments received in order to collect the necessary quality of data needed to inform policy while managing burden to this industry.

Comment Number: EPA-HQ-OAR-2009-0923-1080-28

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment: Aka recommends that the reporting requirement, (98.236(c)(18)(i)) to measure throughput for each compressor should be deleted. Alternatively, if EPA determines that compressor throughput is needed, that information should be provided on a per facility basis (i.e., as an aggregate for all compressors at a given facility rather than for each compressor individually) and throughput should be based on engineering estimates rather than direct measurement.

Response: EPA has evaluated this issue and is not requiring compressor throughput flow meters for each compressor; estimates of compressor flow are allowed. Please see Section II.E of the preamble and the revised Section 98.236 in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1299-17

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment: We are concerned that the level of detail required in this proposed regulation for LDCs is too extensive and not warranted. The natural gas industry is committed to reducing its emissions. Our member companies have been actively involved for years in programs required by state public service and public utility commissions to identify and address leakages, as well as involuntary emissions reduction programs such as EPA's Natural Gas STAR. Enhancing system integrity and safety are paramount, and reducing emissions is our mutual goal.

Response: EPA has reviewed the comment and has taken a number of steps to reduce the reporting burden on LDCs. These are detailed in Section III.B.2 of the preamble of today's final rule, which discusses EPA's assessment of burden issues in the natural gas distribution sector. Other programs implemented by state and public utilities commissions (i.e., Maryland Public Service Commission, Indiana Utility Regulatory Commission, South Dakota Public Utilities Commission, and many others) that identify leaks are driven by safety issues, and the specific estimation of leak magnitude and GHG impact are not primary issues that drive those programs. For further details, please see rulemaking docket EPA-HQ-OAR-2009-0923 under "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements".

Comment Number: EPA-HQ-OAR-2009-0923-0049-4

Organization: American Gas Association

Commenter: Pamela Lacey

Comment: Distribution Mains & Service Lines – Duplicates Existing Data Collection

Our member LDCs already report their miles of natural gas distribution mains and service lines annually to the Department of Transportation (DOT), and EPA calculates methane emissions for purposes of its annual greenhouse gas (GHG) Inventory by multiplying the pipe mileage reported to DOT by applicable emission factors. There is no need to require LDCs to file duplicative reports under Subpart W. EPA already has the same information by referring to the DOT data.

Response: EPA’s intent in today’s final rule is to gather emissions data from sources in each segment of the petroleum and natural gas systems subpart. Pipeline source, as defined in Section 98.232 (i) are a portion of the total sources to be reported under natural gas distribution in today’s rule. It is essential that reporters provide and certify the data they gather under this rule so that EPA has a complete inventory from all sources under this rule. In addition, EPA has determined that since the miles are already reported to DOT, the application of defined emission factors under this rule to those miles would be a straightforward calculation with minimal burden to the reporter. See also, rulemaking docket EPA-HQ-OAR-2009-0923 under “Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements.”

Comment Number: EPA-HQ-OAR-2009-0923-1168-5

Organization: Delmarva Power a PHI Company

Commenter: Wesley L. McNealy

Comment: Duplication of Existing Data Collection

Through Subpart W, EPA proposes to require LDCs of natural gas to report fugitive and vented methane emissions from city gate stations, metering and regulating (M&R) stations, natural gas distribution mains and services lines through prescribed emission factors and optical gas scanning methods.

DPL, along with other LDCs, currently is required to report spans of natural gas mains and service lines to the US DOT on an annual basis. Currently, the EPA utilizes this DOT data to calculate methane emissions for the purposes of its annual GHG Inventory. Therefore, requiring the same data collection requirements under Subpart W is duplicative and unnecessary.

Response: Please see response to EPA-HQ-OAR-2009-0923-0049-4.

Comment Number: EPA-HQ-OAR-2009-0923-3568.5-6

Organization: Environmental Defense Fund

Commenter: Peter Zalzal

Comment: In all, EPA’s proposed oil and gas reporting rule is an important step in providing policymakers and the public with data from the oil and gas sector facilitating sound greenhouse gas policy decisions. Accuracy is also an essential element of a robust reporting scheme. And

EDF hopes that in its final rule, EPA will select monetary methods that strengthen the accuracy of emissions data providing policymakers with the best possible information.

Response: EPA has determined that your comment asks that EPA to select “monitoring methods” (as opposed to monetary) that strengthen the accuracy of emissions data reporting. In fact, EPA has determined that the methodology used in today’s final rule will provide coverage of about 85% of GHG emissions from the oil and natural gas systems. In addition, the sources included in the rule and the procedures required will result in substantially improved information on both activity levels and reported emissions from reporting parties in this subpart.

Comment Number: EPA-HQ-OAR-2009-0923-3568.3-3

Organization: Sierra Club

Commenter: Anne Harvey

Comment: We also urge EPA to carefully ground truth estimation methods with regular direct measurement tests at selected facilities.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-3568.5-6.

In addition, there are requirements for reporters to certify emissions reporting data accuracy in today’s rule, and the potential risk of an EPA audit and compliance penalties.

Comment Number: EPA-HQ-OAR-2009-0923-3166-1

Organization: Texas Oil and Gas Accountability Project

Commenter: Sharon Wilson

Comment: The public has a right to know about the global warming pollution being emitted by the oil and gas industry. So far, the industry has successfully delayed regulation of these emissions. We need strong leadership from EPA requiring the oil and gas industry to fully disclose its global warming pollution. We need accurately measured data not industry estimates.

Response: EPA is requiring reporting parties to use either direct measurement or actual operational data and equipment activity to perform detailed engineering estimates using formulas and relationships that are acceptable to EPA and provide reliable data to assist EPA in forming future policy. Please also see the response to EPA-HQ-OAR-2009-0923-3568.5-6.

Comment Number: EPA-HQ-OAR-2009-0923-0103-2

Commenter: Gail Reams

Comment: I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-3166-1.

3.3 OTHER GENERAL RATIONALE COMMENTS

Comment Number: EPA-HQ-OAR-2009-0923-0743-1

Commenter: C. Laurich

Comment: This year, the EPA is proposing to set things right and finally include the offshore - and onshore - oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. And, most importantly, the reports are used to make the decisions necessary to reduce global warming and air contamination.

Response: Please see response to comment EPA-HQ-OAR-2009-0923-3166-1.

Comment Number: EPA-HQ-OAR-2009-0923-1015-23

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment: Re: Natural Gas Driven Pneumatic Pumps: It is unclear at what point is the unit considered not in operation and therefore exempt. It is impractical to keep the records that the EPA is proposing. It does seem from supporting documentation that it is not expected that these sources are a large emitter of GHGs. Therefore, utilizing man-hours to track and maintain a library of emission data from these pumps is overly burdensome to report a relatively small amount of GHG emissions. This data is kept by well-site, not by individual pumps. PAW proposes allowing a site-wide volume of liquid pumped.

Response: EPA recognizes the concern and has modified the reporting requirements for natural gas driven pneumatic pumps in Section 98.233 to reflect the use of equipment counts and population emissions factors.

Comment Number: EPA-HQ-OAR-2009-0923-1059-1

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment: We respectfully recommend the EPA refrain from requiring reporting of fugitive GHG emissions from natural gas distribution systems due to the insignificant amount of GHG emissions that occur from natural gas distribution systems, compressor stations and LNG facilities, and the inaccuracy in estimating emissions from these sources. The estimated emissions would not provide accurate data for the EPA and U.S. Congress to consider in applying GHG legislation, policy or other programs to these sources. Furthermore, improving on

these inaccuracies by using intricate monitoring equipment and additional labor would be very costly to industry, and would in turn increase costs for customers, but provide no direct benefit.

Response: EPA does not agree that equipment leak GHG emissions from natural gas distribution systems, compressor stations and LNG facilities should not be reported. EPA is requiring reporting of equipment leak GHG emissions from these sources so that a comprehensive inventory of GHG emissions can be made for each source category. The extent of fugitive, or as defined in the rule, equipment leaks, is not known in these source categories, and use of leak detection and leaker factors, and activity of components and population factors will provide an assessment on a consistent basis with other source categories. Regarding cost issues, EPA does not agree with the commenter. Please see EPA's response to these concerns at EPA-HQ-OAR-2009-0923-1303-2 (industry burden and impacts on customers) and EPA-HQ-OAR-2009-0923-0132-3 (costs of monitoring requirements and labor).

VOLUME 4: APPROACH TO VERIFICATION AND MISSING DATA

4.0 APPROACH TO VERIFICATION AND MISSING DATA

No Comments Received.

4.1 SELECTION OF VERIFICATION APPROACH

Comment Number: EPA-HQ-OAR-2009-0923-1018-44

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment: As in 98.233(n)(i) CAPP noticed that in 98.233(u)(2)(ii) the terminology is not representative of most gas plants. Please refer to 98.233(n)(i) for CAPP's recommendation.

Additionally, CAPP noticed that equation W-22 will over estimate emissions by a factor of 100 since M_i is in mole percent and not mole fraction; therefore we recommend that the EPA corrects the equation by dividing it by 100.

Response: EPA has reviewed the terminology and agrees that the rule language should be modified to include a dew point control for processing facilities without a demethanizer. Please see 98.233(n)(2)(ii).

In addition, we have modified equation W-22 as the commenter suggested. .

Comment Number: EPA-HQ-OAR-2009-0923-1080-29

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment: Aka recommends that criteria be established that allows a facility to determine with certainty if the rule applies by January of each calendar year. The criteria are needed due to the unpredictable nature of sources such as blowdowns, flares, compressor vents and seals, and fugitive leaks. Also, for compressor vents and seals and fugitive leaks, a facility will not be able to determine emissions from the sources until the direct detection and measurement is completed.

Response: As discussed in Section II.F of the preamble, EPA plans to develop voluntary screening tools for each petroleum and natural gas industry segment. These tools can aid in assessing applicability as the commenter suggested.

Comment Number: EPA-HQ-OAR-2009-0923-1167-16

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment: Data quality objectives should be defined to provide guidance on emission source inclusion and emission estimation method selection:

-Rational, justified, and clearly defined guidance regarding acceptable range of data accuracy and uncertainty for individual emission sources and the entire inventory. This guidance should be closely aligned with the inventory and data objectives. For example, annual measurement or data collection should be technically justified based on observed variability and accuracy objectives, not a perception that increased frequency results in substantially improved estimates.

Response: EPA has assessed the data quality and frequency requirements in today's final rule, including the burden impacts. While the commenter provided general comments, today's final rule does contain a number of modifications based on a number of industry comments and EPA analysis. Rule modifications are noted in Section II.E of the preamble. Several of the changes reflect consideration of data gathering frequency issues. For example, when collecting gas composition data for produced natural gas, EPA has revised today's final rule to allow the gas analysis for produced gas in Section 98.233(u) to use the reporter's most recent gas composition based on available sample analysis of the field, if reporters do not have a continuous gas composition analyzer already installed, in lieu of quarterly sampling in the proposed rule.

Comment Number: EPA-HQ-OAR-2009-0923-1167-41

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment: EPA should adopt a safe harbor policy for the first two annual submissions by those reporting under Subpart W whereby the EPA will presume that the submissions and calculations are being reported honestly and accurately, and that any errors are inadvertent.

The reporting required by Subpart W is unprecedented and will be implemented on an aggressive timeline. The goal of these reporting requirements is to obtain emissions data, and the reporting requirements should not penalize reporting that is done diligently, in good faith and on a timely basis. As the EPA and reporting entities monitor implementation of the reporting requirements, utilize best practices and streamline the process, the process will improve. Innovation is necessary. Some of these best practices have long-term potential and should be encouraged. The EPA should focus any enforcement efforts on those who do not report in good faith or intentionally submit false information. When other agencies have implemented unprecedented programs gathering aggressive amounts of data, they have employed a safe harbor policy for the initial reporting period where submissions are presumed to be made in good faith. See, FERC, Policy Statement on Natural Gas and Electric Price Indices, PL03-3-000 (July 24, 2003), PL03-3-001 (December 12, 2003). The EPA should not seek to prosecute or penalize errors in reporting unless those errors violated good faith standards, contained intentional submission of false or misleading data or intentionally failed to report data. In addition to delayed reporting and the phase-in approach Noble has requested in the above comments, Noble proposes that EPA adopt a safe harbor policy for the first two annual submissions by those reporting under Subpart

W whereby the EPA will presume that the submissions and calculations are being reported honestly and accurately and that any errors are inadvertent.

Response: As discussed in Section II.F.3 of the preamble, EPA is allowing the use of the best available monitoring methods to provide reporters flexibility to implement the monitoring requirements. EPA is not providing a safe harbor provision for this rule. Please see Volume 8.1, comment excerpt EPA-HQ-OAR-2009-0923-1011-30 for EPA's response to the safe harbor issue.

As to the comments about EPA's enforcement efforts, this rule is being issued under the CAA, which includes enforcement provisions, for more information about those provisions and how they relate to the Greenhouse Gas Reporting Program, which with today's final rule includes the monitoring and reporting requirements under subpart W, please see Section VI of the preamble to The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) and the EPA's Response to Public Comments, Volume 8, Compliance and Enforcement, (EPA-HQ-OAR-2008-0508).

4.2 MISSING DATA

Comment Number: EPA-HQ-OAR-2009-0923-1024-47

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

SECTION 98.235 Procedures for estimating missing data.

A complete record of all estimated and/or measured parameters used in the GHG emissions calculations is required. If data are lost or an error occurs during annual emissions estimation or measurements, you must repeat the estimation or measurement activity for those sources as soon as possible, including in the subsequent reporting year if missing data are not discovered until after December 31 of the reporting year, until valid data for reporting is obtained. Data developed and/or collected in a subsequent reporting year to substitute for missing data cannot be used for that subsequent year's emissions estimation. Where missing data procedures are used for the previous year, at least 30 days must separate emissions estimation or measurements for the previous year and emissions estimation or measurements for the current year of data collection.

Response: In regard to missing data, please see the response to EPA-HQ-OAR-2009-0923-1011-51 and EPA-HQ-OAR-2009-0923-1027-13.

Comment Number: EPA-HQ-OAR-2009-0923-1011-51

Organization: El Paso Corporation

Commenter: Fiji George

Comment: Section 98.235 Procedures for estimating missing data

The proposed missing data substitution requirements for Subpart W differ from the requirements for Subparts C.

The proposed requirements for Subpart W are “If data are lost or an error occurs during annual emissions estimation or measurements, you must repeat the estimation or measurement activity for those sources as soon as possible, including in the subsequent reporting year until valid data for reporting is obtained. Data developed and/or collected in a subsequent reporting year to substitute for missing data cannot be used for the subsequent year’s emission estimation.”

For Subpart C, 98.35(a)(1) requires substituting “the arithmetic average of the quality-assured values of that parameter immediately preceding and immediately following the missing data incident. If the “after” value has not been obtained by the time that the GHG emissions report is due, you may use the “before” value for missing data substitution or the best available estimate of the parameter, based on all available process data (e.g., electrical load, steam production, operating hours). If, for a particular parameter, no quality-assured data are available prior to the missing data incident, the substitute data value shall be the first quality-assured value obtained after the missing data period.” The requirements for Subpart Y are similar to Subpart C.

For consistency, El Paso recommends using similar requirements for missing data under Subpart W rather than introducing a different set of requirements.

Response: The data collected under today’s final rule are significantly different from those collected under subparts C and Y. Rather than frequent and repeated monitoring (e.g., hourly, daily, monthly, etc.), today’s final rule, for the most part, requires one collection of data during a reporting year or over a three year period measurement of emissions that are used as a factor. Missing data for these one-time/anytime measurements can be re-done; and for those sources (compressors) required to be done once in a three year period, they can be done next year or the following. Therefore, EPA has determined that the type of missing data provisions offered in subparts C and Y are not appropriate in today’s final rule. There is no need to average or take before and after measurements when there is only a one time measurement that is required. It is important to note that any combustion emissions located at facilities applicable to today’s final rule, other than onshore production and natural gas distribution, will follow the subpart C methods and missing data requirements as specified.

Onshore production and natural gas distribution shall follow methods for monitoring combustion emissions as provided in today’s final rule.

For those portions of today’s final rule which are not “one collection” of data during the year (for example, continuous monitoring equipment such as flowmeters used for Acid Gas Removal Vent), missing data requirements have been delineated in Section 98.235 in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1018-51

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment: Section 98.235 Procedures for estimating missing data

“If data are lost or an error occurs during annual emissions estimation or measurements, you must repeat the estimation or measurement activity for those sources as soon as possible, including in the subsequent reporting year if missing data are not discovered until after December 31 of the reporting year, until valid data for reporting is obtained.” ·

- CAPP recommends that the EPA allow the use of interpolation and estimation to fill in gaps for the year where data are lost or an error occurs, as data from the following year might not be representative of the previous year’s operation.

“Data developed and/or collected in a subsequent reporting year to substitute for missing data cannot be used for that subsequent year’s emissions estimation.” ·

- CAPP also suggests that the EPA allow samples to be used for any year in which they are representative, regardless of when they were taken. This removes some of the burden and cost associated with continually testing a compositionally steady stream.

“Where missing data procedures are used for the previous year, at least 30 days must separate emissions estimation or measurements for the previous year and emissions estimation or measurements for the current year of data collection.” ·

- Again CAPP recommends that the EPA allow the use of interpolation and estimation to fill in gaps for the year where data are lost or an error occurs, as data from the following year might not be representative of the previous years operation and that the EPA allow samples to be used for any year in which they are representative, regardless of when they were taken. This removes some of the burden and cost associated with continually testing a compositionally steady stream.

Response: Regarding the interpolation and estimation issue, please see response to EPA-HQ-OAR-2009-0923-1011-51.

Regarding sampling, EPA agrees with the commenter’s recommendation. EPA has revised today’s final rule to allow the gas analysis for produced gas in Section 98.233(u) to use the reporter’s most recent gas composition based on available sample analysis of the field. The data will be of sufficient quality while reducing burden.

Comment Number: EPA-HQ-OAR-2009-0923-1019-5

Organization: Red Cedar Gathering

Commenter: Ethan W. Hinkley

Comment: Procedures for Estimating Missing Data

Under the proposed rule EPA requires that operators collect necessary data to replace missing data when it is discovered that the data is missing. If this data collection falls in the next reporting year the data collection activity could not be used as the one-time data collection for the current year. EPA is requiring at least 30 days between the data collection for the previous year and the current year. Red Cedar has determined that this has no relevant basis and creates

unnecessary and duplicative efforts on the part of the operator. Red Cedar strongly recommends that where the data is relevant for both years, data that is collected to replace missing data from the previous year should also be allowed to represent the current year. There is no justifiable reason to determine that data collected 30 days later is more representative of the current year than the replacement data collected for the previous year.

Response: EPA has determined that the process for missing data as defined in Section 98.235 is reasonable. Since most data for today's final rule can be collected at any time during the reporting year, there may be some occasions where missing data may need to be replaced in the following year. EPA has determined that the data gathered in the early months in a new year in order to replace missing data is appropriate, followed by another data collection later in the year for the current calendar year. This is appropriate because the additional data point will augment data accuracy value. The 30 day minimum period between current year and prior year data gathering is a minimum, and the reporter can choose a longer period if they have determined the data would be more representative of the current year. Additionally, the fact that a reporter that loses or fails to record data for a given year should not result in a benefit for that reporter by only reporting data once over a two year period.

Comment Number: EPA-HQ-OAR-2009-0923-1024-34

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment: Comments on the Proposed Missing Data Procedures. In general, Kinder Morgan has determined that EPA has painted with too broad a brush by requiring re-measurement in all cases of missing data. Some missing data can be remedied using reliable third-party sources. For example, missing records of ambient temperatures or pressures can be remedied by simply referring to local weather records for the date in question; this form of substitute data is far more accurate than taking new measurements. Thus, Kinder Morgan urges EPA to limit its re-measurement requirement to critical data for which new measurement is the only reasonable substitute.

Response: For the approach to missing data provisions and re-measurement in today's final rule, please see EPA-HQ-OAR-2009-0923-1011-51. EPA has modified Section 98.235 to delineate how missing data on temperature and pressure should be addressed. For missing temperature and pressure data which would be at ambient conditions, use of local weather records would be acceptable. For missing temperature and pressure data at process conditions that are not at ambient conditions, reporters may use typical historical data for the specific equipment. EPA recognizes that variations in these parameters may not make a substantial difference in emissions estimation (likely under 5%) and therefore will allow substitution of ambient or process temperature and barometric pressure from local weather stations or typical process data only for these missing data.

Comment Number: EPA-HQ-OAR-2009-0923-1039-21

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment: Missing Data Procedures Should Not Require a Repeat Test in All Cases

Missing data requirements are defined in §98.235, which indicates, “A complete record of all estimated and/or measured parameters used in the GHG emissions calculations is required. If data are lost or an error occurs during annual emissions estimation or measurements, you must repeat the estimation or measurement activity for those sources as soon as possible...”. This is an unnecessary and burdensome requirement. Missing data procedures should consider the relative importance of the lost data in question, and whether reasonable means are available to provide an estimate of that parameter, before conducting repeat measurements.

For example, if a vent measurement is conducted at ambient conditions, and it is discovered after the fact that ambient temperature was not recorded or was recorded erroneously, §98.235 would require a repeat test. In addition to mobilizing a test crew, this could require operator actions such as manlift rental and process manipulation to achieve the proper operating mode (e.g., for multi-mode testing on reciprocating compressors). As an alternative, ambient temperature would likely be available from either a related test conducted at the same facility on the same day, or from weather records from a station in proximity to the facility location. These alternatives would provide a very reasonable means to replace the missing data and calculate flowrate at standard conditions and the associated emission rate. For example, relatively accurate “replacement” temperature data may be available, but even if the ambient temperature estimate was 5 % in error, the resulting error in the flow correction to standard conditions would be approximately 1 percent or less.

EPA has avoided addressing “materiality” or “de minimus” emissions in the Reporting Rule. However, common sense approaches to address missing data should be allowed that consider the relative importance of the data, and whether reasonable alternatives are available. For example, §98.3(i) provides accuracy requirements for device calibrations and indicates that, “All measurement devices shall be calibrated to an accuracy of 5 percent.” A similar threshold could be included in §98.235 that indicates: (1) the operator required to complete a repeat measurement unless replacement data or a reasonable estimate is available; (2) the operator shall ensure that a source-specific error of less than 5 percent would result; and (3) the basis for the replacement data and accuracy is documented in the annual report. It is in the operator’s best interest to ensure that all data are routinely acquired and lost data issues are minimized. However, if EPA is concerned that abuse may occur, maximum usage of this allowance could be stipulated in the rule (e.g., no more than four occasions in any annual report).

Response: Please see response to EPA-HQ-OAR-2009-0923-1024-34.

Comment Number: EPA-HQ-OAR-2009-0923-1080-13

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment: The method for replacing missing data in the proposed regulation is not time or cost effective. Measurement of various parameters is required to collect data for GHG emissions calculations. It is reasonable to require that any missing data must be re-estimated or re-measured as soon as possible after discovery. However, it is not reasonable to disallow the use of this newly collected data to both replace the missing data and to serve in another data set in a subsequent year as required by § 98.235. It is also not reasonable to require at least 30 days separation in the emissions estimation or measurement if the replacement data is collected in a subsequent year.

- First, the regulation assumes that data are consistent throughout an entire reporting year, so how would a 30-day separation of the data collection be beneficial? If the data is assumed not to fluctuate over an entire year, why would it be expected to significantly fluctuate over only 30 days?
- Second, the replacement data set that is collected in a subsequent year to the missing data, should be used both as replacement data for the prior year and as new data for the subsequent year. For the same reason mentioned above, there should be virtually no difference in data collected only 30 days apart.

Response: Please see response to EPA-HQ-OAR-2009-0923-1019-5.

Comment Number: EPA-HQ-OAR-2009-0923-1080-21

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment: Aka recommends that data collected to replace missing data per §98.235 be accepted as valid for both the year in which it is collected as well as in the previous year to replace missing data.

Response: Please see response to EPA-HQ-OAR-2009-0923-1019-5.

Comment Number: EPA-HQ-OAR-2009-0923-1151-60

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment: Section 98.235. Procedures for Estimating Missing Data. The missing data procedure detailed in this section specifies that an operator must repeat a missed measurement as soon as possible. This procedure is sufficient for measurements that are periodic; however, this procedure is not feasible for any “continuously” monitored data such as volumetric flow. If a flow meter malfunctions, there is no way to repeat the measurement for a period of time that has passed. API requests that the procedures for missing data include provisions for data substitution for all “continuously” monitored data. The data substitution can be accomplished by averaging the previous and next measured values, by using the same measured value from a previous period, or some other appropriate method specified in the operator’s GHG Monitoring Plan.

Response: Please see response to EPA-HQ-OAR-2009-0923-1011-51 on “continuously” monitored data.

Comment Number: EPA-HQ-OAR-2009-0923-1167-46

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment: Missing data procedures should not require a repeat test in most cases.

Missing data requirements in Section 98.235 indicate “A complete record of all estimated and/or measured parameters used in the GHG emissions calculations is required. If data are lost or an error occurs during annual emissions estimation or measurements, you must repeat the estimation or measurement activity for those sources as soon as possible...”. This requirement is unnecessarily burdensome. Missing data procedures should consider the relative importance of the lost data and whether reasonable means are available to provide an estimate of that parameter before conducting repeat measurements.

For example, if a quarterly gas composition sample was not collected, or it was discovered after the fact that laboratory error resulted in no data, Section 98.235 would require a repeat test. Under these circumstances, the other three quarterly samples would be sufficient to determine an annual average composition and a re-sampling, months after the missing data event, would not be justified. As a second example, compressor vent gas measurements are conducted at ambient conditions, and if it is discovered after the fact that the ambient pressure was not recorded during a measurement, a repeat test would be required by Section 98.235. This would require test crew and operator remobilization, and could require operator actions such as man lift rental and process manipulation to achieve the proper operating mode (e.g., for multi-mode testing on reciprocating compressors). Rather than retest, ambient pressure could be determined from weather records from a station in proximity to the facility location. This would provide a very reasonable means to replace the missing data and calculate the vent gas flowrate at standard conditions. Even if the ambient pressure estimate was 0.5 “Hg in error, the resulting error in the flow correction to standard conditions would be approximately 2% or less. If suitable data from previous year(s) are available reasoned engineering judgment should be allowed and applied to complete the missing data and the estimate should be denoted as missing or errant data was replaced.

Although EPA has not addressed “materiality” or insignificant emissions in the Reporting Rule, sensible approaches to missing data that consider the relative impact of the data and whether reasonable alternatives are available should be allowed. For example, Section 98.3(i) provides accuracy requirements for device calibrations such that “All measurement devices shall be calibrated to an accuracy of 5 percent.” Section 98.235 could include a similar threshold that requires that: (1) the operator to complete a repeat measurement unless replacement data or a reasonable estimate is available; (2) the operator document that a source-specific error of less than 5% would result; and (3) the basis for the replacement data and accuracy is documented in the annual report. It is in the best interest of operators to ensure that all data are routinely

acquired and lost data issues do not occur; however, if EPA is concerned lost data allowances could be exploited; maximum usage of this allowance could be stipulated in the rule (e.g., no more than 10 % of emission sources in any annual report).

Response: In the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002), EPA required quarterly sampling of produced gas and has modified today's final rule to allow the gas analysis for produced gas in Section 98.233(u) to use the reporter's most recent gas composition based on available sample analysis of the field. Please see Section II.E of the preamble to today's final rule.

In addition, concerning other data issues raised, please see responses to EPA-HQ-OAR-2009-0923-1011-51 and to EPA-HQ-OAR-2009-0923-1024-34.

Comment Number: EPA-HQ-OAR-2009-0923-1206-57

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment: The missing data procedure detailed in this section specifies that an operator must repeat a missed measurement as soon as possible. This procedure is sufficient for measurements that are periodic; however, this procedure is not feasible for any "continuously" monitored data such as volumetric flow. If a flow meter malfunctions, there is no way to repeat the measurement for a period of time that has passed. We request that the procedures for missing data include provisions for data substitution for all "continuously" monitored data. The data substitution can be accomplished by averaging the previous and next measured values, by using the same measured value from a previous period, or some other appropriate method specified in the operator's GHG Monitoring Plan.

Response: Please see response to EPA-HQ-OAR-2009-0923-1011-51 on "continuously" monitored data.

Comment Number: EPA-HQ-OAR-2009-0923-1297-6

Organization: Southern Ute Growth Fund

Commenter: Lynn Woomeer

Comment: Procedures for Estimating Missing Data (§98.235)

As proposed, should operators lose data or an error is made when collecting data, the operator is required to repeat and acquire the missed measurement as soon as possible. The SUGF suggests EPA reevaluate the procedures under this section to consider continuous measurement devices, and data relevancy without the 30-day time window associated with the previous and current year distinction.

Since measurement is not specified per specific EPA approved methods, it is of the SUGF's

opinion that data substitution be accomplished through established and proven scientific means that have been identified within the operator's GHG Monitoring Plan.

Response: On the continuous monitoring issue, please see response to EPA-HQ-OAR-2009-0923-1011-51. On the 30 day issue, please see response to EPA-HQ-OAR-2009-0923-1019-5.

Comment Number: EPA-HQ-OAR-2009-0923-1298-47

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment: Section 98.235: The missing data procedure detailed in this section specifies that an operator must repeat a missed measurement as soon as possible. This procedure is sufficient for measurements that are periodic; however, this procedure is not feasible for any “continuously” monitored data such as volumetric flow. If a flow meter malfunctions, there is no way to repeat the measurement for a period of time that has passed. IPAMS requests that the procedures for missing data include provisions for data substitution for all “continuously” monitored data. The data substitution can be accomplished by averaging the previous and next measured values, by using the same measured value from a previous period, or some other appropriate method specified in the operator’s GHG Monitoring Plan.

Response: Please see response to EPA-HQ-OAR-2009-0923-1011-51 on “continuously” monitored data.

VOLUME 5: INITIAL YEAR OF REPORTING, DURATION OF THE REPORTING PROGRAM AND PROVISIONS TO CEASE REPORTING

5.0 INITIAL YEAR OF REPORTING, DURATION OF THE REPORTING PROGRAM AND PROVISIONS TO CEASE REPORTING

Comment Number: EPA-HQ-OAR-2009-0923-1024-17

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

Extend annual report submission deadline for onshore production facilities. Kinder Morgan is concerned that the annual deadline of March 31 for submission of emission reports will not allow sufficient time for production well owners and operators to collect and compile all necessary data from all entities responsible for operating the well. Therefore, Kinder Morgan respectfully requests that reporting entities in the onshore production sector be allowed a 90-day extension of the annual reporting deadline.

Response: EPA does not agree to generally extend the deadline for onshore production segment reporting by 90 days. Since reporting of some required sources of emissions are tied to events that occur only once at the beginning of the year, and EPA agrees that reporters may not have sufficient time to collect this data, today's final rule provides for best available monitoring methods for such data. See responses to comments in Section II.F of the preamble.

5.1 SELECTION OF THE INITIAL REPORTING YEAR

Comment Number: EPA-HQ-OAR-2009-0923-0582-24

Organization: Western Climate Initiative (WCI)

Commenter: Michael Gibbs

Comment Excerpt Text:

The WCI Reporting Committee Oil and Gas Subcommittee recognizes that methane emissions from natural gas driven pneumatic devices represent not only a significant greenhouse gas source but also significant lost revenue to industry and lost royalties to the regulating jurisdiction. It is estimated that in the production and transmission sectors there are some 400,000 pneumatic devices used to monitor and control liquid levels and flows, gas flows and levels in dehydrators, and control pressure in flash tanks (USEPA – Options for Reducing Methane Emissions from Pneumatic Devices in the Natural Gas Industry). In addition, many methodologies and technological fixes to effectively and economically reduce or eliminate these emissions (and save money) are currently available. Many mitigation options identified by USEPA have pay-back times of less than one year. Whether this GHG emission source ultimately is covered as part of a cap-and-trade program or addressed through an offset approach, it is essential that emissions be accurately quantified.

The magnitude and importance of this GHG source and the myriad of available emissions reduction strategies, requires direct measurement of these emissions. Where default emissions factors are available (from OEM or API) the accuracy and applicability of these EFs to real world operational conditions is questionable at best (see API Compendium, 2009). These EFs do not and cannot accurately reflect current emissions or emission reductions achieved through such procedures as enhanced maintenance, cleaning and tuning, repair/replacement of leaking gaskets, tube fittings and seals, or adjustments made to control loops to lower emissions.

Only direct measurement of pneumatic device emissions (Options 3) will provide the rigor required for either cap-and-trade or offset programs. Option 2, the direct measurement of emissions from individual devices, is both time consuming and costly. Furthermore, the accuracy of periodic single measurements in assessing long term emissions is questionable and additional measurements would be required to accurately assess the efficacy of emission reduction efforts.

Thus Option 3 is deemed to be the most accurate methodology to 1) accurately measure current emissions from pneumatic devices and 2) quantify emission reductions resulting from mitigation and control measures. The subcommittee recognizes that requiring metering of all pneumatic devices would, in some cases, require upfront costs associated with materials and labor needed to re-plumb and instrument large facilities with many pneumatic devices. The WCI recommendation does not require a meter be installed for each device – only that pneumatic device and pump gas consumption be metered. In most cases it should be possible to meet the requirements by plumbing all or multiple pneumatic device gas supply lines through a single meter.

In addition, the subcommittee recommends that metering not be required for low bleed devices and instead engineering calculations would be accepted. Although engineering calculation is not the most accurate mechanism to measure emissions from low bleed devices, the attendant error would be small since the total emissions from these sources are small.

The subcommittee also recommends a phased-in approach where, in year one, 50% of all high bleed and continuous bleed pneumatic devices and pneumatic natural gas powered pumps must be metered. In year two, all gas consumption for all pneumatic devices and pumps shall be metered excluding low bleed or no bleed devices. This phased-in approach will provide a two-year period for affected facilities to install the required meters prior to the anticipated 2012 start of WCI Cap-and- Trade program.

While low bleed and no bleed devices would be exempt from direct metering requirements, emissions for the low bleed devices must still be reported. These emissions should be estimated using default EFs. In year one, emissions from all unmetered high bleed devices and pneumatic pumps must be quantified using device/pump specific EFs (OEM if available or default EFs).

WCI Recommendation: WCI recommends the direct measurement of pneumatic gas consumption for all high bleed pneumatic devices and all natural gas powered pneumatic pumps. Emissions from all low bleed devices would be calculated using OEM emissions factors or default emissions factors if OEM data is not available.

WCI Modifications: WCI recommends the following modifications to the proposed subpart W requirements:

SECTION 98.233 (a) Natural gas pneumatic high bleed device venting

(1) Calculate vented emissions from a natural gas pneumatic high bleed control devices or pneumatic pump as follows:

i) Measure gas consumption for all high bleed natural gas powered devices and pneumatic pumps using a meter or meters that meet accuracy requirements specified in SECTION 98.3(i). In year one, reporters are required to meter gas consumption for at least 50% of all high bleed devices and pneumatic pumps. Metering of gas consumption for all high bleed devices and pneumatic pumps is required in year 2. Common meters may be used wherever possible.

ii) Calculate CH₄ and CO₂ emissions from high bleed pneumatic devices and pumps as follows:
 $E [\text{subscript GHGi}] = V [\text{subscript NG}] * M [\text{subscript i}] * MW [\text{subscript i}] / MVC * 0.001$

Where:

$E [\text{subscript GHGi}]$ = emissions of GHG i (i = CH₄ or CO₂) in metric tons

$V [\text{subscript NG}]$ = volume of natural gas consumed by metered high bleed pneumatic devices and pumps (scf/year)

$M [\text{subscript i}]$ = mole fraction of CH₄ or CO₂ in natural gas supply

$MW [\text{subscript i}]$ = molecular weight of GHG [subscript i]

MVC = molar volume conversion factor

0.001= conversion factor – kg to metric tons

Emissions from low bleed devices will be calculated using methods found in SECTION

98.233(b).

In year 1, emissions from high bleed pneumatic devices and pumps that are not metered will be calculated using methods from in SECTION 98.233(a) and SECTION 98.233(b) respectively.

In year 2, emissions from all high bleed pneumatic devices and pumps will be calculated using the methods shown above.

Response: EPA considered several methodologies for pneumatic devices, please see “Alternative Methodologies” in the rule making docket (EPA-HQ-OAR-2009-0923). EPA disagrees with the comments regarding direct measurement of pneumatic device gas consumption, please see comment EPA-HQ-OAR-2009-0923-0582-23. EPA agrees that emission factors may be used for low-bleed pneumatic devices and has implemented this in the final rule, including high-bleed and intermittent-bleed devices. Please see EPA-HQ-OAR-2009-1024-38.

With regard to a phased-in approach for pneumatic devices, EPA disagrees. However, EPA has determined that it could sufficiently relieve burden on monitoring this source by allowing reporters to use any combination of device counts and best available data for the first and second reporting year, then requiring a count of all pneumatic devices be completed by the third year, updating prior year counts for changes in equipment. This complete count would be updated for equipment changes from the third reporting year onward.

Comment Number: EPA-HQ-OAR-2009-0923-1306-15

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

As stated previously, we recommend removal of natural gas distribution systems from the requirement to report GHG emissions; however, if EPA chooses to retain the natural gas distribution segment, then we recommend that the GHG monitoring requirement be postponed to beyond 2011 to allow time to clarify requirements and prepare for implementation.

Response: EPA disagrees with the comment. For further information on why EPA has retained reporting requirements for LDCs, please see the response to EPA-HQ-OAR-2009-0923-1016-5. EPA disagrees to postpone reporting for this reason; however, under certain conditions it allows the use of BMM. See Section II.F of the preamble to the final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1010-6

Organization: Oklahoma Independent Petroleum Association

Commenter: Burckhalter

Comment Excerpt Text:

The timing of data collection and reporting is not appropriate. EPA proposes that facilities required to report under subpart W would begin data collection in 2011 and submit data to EPA

by March 31, 2012. We think EPA's proposed timing is not appropriate for most crude oil and natural gas production businesses.

a. Significant number of wells. According to the Oklahoma Corporation Commission, there are approximately 120,000 wells in Oklahoma alone. Most of these wells are marginal wells operated by small businesses. More time is needed to allow all operators, including small crude oil and natural gas businesses, to better understand the requirements, reserve funds for this effort, train personnel as needed, establish procedures and protocols to meet EPA's requirements, and hire consultants. Additionally, it will allow EPA more time to develop well defined tools that can be easily utilized by oil and gas businesses to determine applicability, to calculate emissions from equipment, and allow EPA to conduct much needed outreach and education to small businesses.

b. Lack of qualified consultants. Many small businesses that operate crude oil and natural gas production sites will need to hire qualified consultants to comply with the proposed rule. We think there will be a shortage of qualified consultants and equipment to collect quality data and to help operators submit the necessary information to EPA.

c. Reporting date conflicts with other reporting requirements. EPA proposes annual reports be submitted by March 31 each year; however, this overlaps with many reporting requirements (e.g. SARA Title III, Tier II reports). We request EPA change the GHG reporting date from March 31 to July 1 to allow industry (especially small businesses) time to adequately address all their reporting requirements. At a minimum, EPA should reevaluate the proposed timing of the data collection and reporting for crude oil and natural gas producers. If EPA believes that including the small businesses and marginal wells that have low production rates, we recommend that data collection begin no earlier than calendar year 2012, with the first reports due in 2013.

Response: Regarding data collection please see the response to EPA-HQ-OAR-2009-0923-1151-133. For EPA's response to comments on the rule's impacts on small entities please see EPA-HQ-OAR-2009-0923-1005-7 and Subpart W's effect of marginal wells see EPA-HQ-OAR-2009-0923-0053-1. Concerning the lack of qualified consultants, please see the response to EPA-HQ-OAR-2009-0923-1196-7. EPA disagrees with altering the March 31 deadline, please see EPA-HQ-OAR-2009-0923-1024-17; however, EPA has determined not to extend the deadline. However, please also refer to Section II.F of the preamble in today's final rule for a discussion of data reporting requirements and the potential use of Best Available Monitoring Methods.

Comment Number: EPA-HQ-OAR-2009-0923-1004-10

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

Permitting phased implementation of the reporting requirements (as discussed below), to allow entities in the production sector sufficient time to carry out applicability determinations, conduct component counts, and install all necessary meters and other equipment;

Response: In today's final rule, EPA does not allow the phasing in of emissions reporting, however, under certain conditions allows the use of BAMM. See Section II.F of the preamble to the final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1011-27

Organization: El Paso Corporation

Commenter: Fiji George

Comment Excerpt Text:

Preamble Section II.(A.) on Page 18612 — EPA's proposed dates for initial data collection and initial submittal of reports are not feasible. El Paso requests the EPA to consider a June 30 submittal deadline for all emission reports related to Subpart W.

On page 18612 of the proposed rules, the EPA states that the facilities would be required to collect data (i.e. conduct monitoring) in 2011 "following the methods outlined in the proposed rule, and submit data to EPA by March 31, 2012." EPA cites the need for data to inform future GHG policy and regulatory programs and Congressional intent to develop a reporting program on an expedited schedule as reasons for the monitoring and reporting schedule of the proposed rule. Also, the preamble of the proposed rule cites that the "EPA considered, but decided not to propose, the use of best available monitoring methods for part (e.g., the first three months) or all of the first year of data collection." EPA concludes that the time period (i.e. monitoring in 2011 and reporting by March 31, 2012) is "sufficient to allow facilities to implement the monitoring methods that would be required by the proposed rule." EPA supports its decisions based on the following:

1. The proposed monitors are widely available and not time consuming to install;
2. Some of the monitoring methods do not require installation of monitoring equipment;
3. Monitoring can be conducted anytime during the year and not necessarily on January 1, 2011 or even during the first quarter.

El Paso believes EPA's reasoning above ignores practical regulatory, legal, technical and resource constraints faced by both the reporting entity and the government. By establishing such an aggressive schedule, without a transition period allowing for use of best available data, EPA has failed, without adequate justification, to give reasonable consideration to an important aspect of the challenges presented by the Subpart W rule.

These challenges are outlined below:

A. Unlike EPA Gas STAR voluntary initiatives, the proposed rules require significant internal processes and policies to ensure a "compliance grade" program. Development of "compliance grade" systems, processes and policies takes time:

It is likely that the final rule will probably be released by third quarter of 2010 and therefore it is likely that reporting entities will have only a few months to establish a compliance program.

All reports have to follow the certification under Section 98.4(e)(1) as below:

"I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

El Paso is the only natural gas company to have reported certified US emissions from natural gas production, processing and transmission facilities with CCAR and DOE. We currently operate 198 transmission compressor stations, 11 processing plants, 40 offshore production facilities, 62 onshore production fields, and one Liquefied Natural gas (LNG) import terminal. Of these, 156 facilities⁵⁸ are anticipated to be subject to the proposed rule.

El Paso will have to account for emissions from over a million discrete components. Despite El Paso's unrivalled experience in emissions accounting and monitoring, we feel that the proposed start date of January 1, 2011 is extremely aggressive and will undermine quality of data reported. Several features required by the EPA proposal will require us to develop internal policies and procedures that will be needed to provide our Designated Representative a reasonable assurance of compliance. Compliance with the rules will, therefore, require the development of internal control systems and policies in addition to the monitoring and reporting programs required by the EPA. Companies may, for example, need to develop robust inventory management plans (for monitoring and reporting of emissions), internal audit, QA/QC plans, and similar control systems in support of the Designated Representatives' certification of companies' inventories.

Such policies and procedures have to be established such that it provides a reasonable assurance of compliance to management prior to the signature and submittal of the report per Section 98.4(e)(1). Other measures faced by companies such as contracts with third party vendors, developing monitoring and compliance plans all take time. By requiring initiation of compliance monitoring in 2011, the EPA will likely be creating an unsustainable, unverifiable program with emissions estimates that are highly susceptible to error.

B. EPA underestimates the time required to develop compliance tools and submit:

1. El Paso's Subpart C "Monitoring Plan" Experience

Detailed analysis of EPA's cost estimates and El Paso's projections of the same with respect to Subpart W compliance is provided in Appendix II of these comments.

EPA requires a written GHG monitoring plan containing the information specified in 40 CFR

⁵⁸ Estimates based on available data and generally accepted GHG estimation methods. Natural gas exploration and production facilities were defined at a "reporting field" level within a "basin" as defined under proposed Section 98.238 (i.e., all such fields when aggregated emits over 25,000 tons per year). See Appendix II of the comments.

98.3(g)(5). In relation to compliance with 40 CFR 98 Subpart C, El Paso developed monitoring plans for 71 transmission facilities, which involved compilation and/or verification of equipment specifications for 796 stationary fuel combustion sources. Based on our actual work, our collective resource time expended on these monitoring plans were approximately 650 hours, i.e. approximately 9 hours per facility.

For Subpart W compliance, monitoring plans would have to be developed for about 156 facilities. This will cover the facilities already identified as subject to Subpart C plus 85 additional facilities. It is estimated that extending existing monitoring plans to the additional facilities will take approximately 6 hours per natural gas transmission facility, which will involve data gathering and/or QA/QC for approximately 650+ additional stationary fuel combustion sources alone. For exploration and production facilities, it is estimated that 10 hours per facility will be expended on initial monitoring plan development. It is expected that the development of the monitoring plan to comply with subpart W requirements will take considerably longer than the monitoring plan for Subpart C due to:

1. Multiple facility categories under Subpart W;
2. Different emission source types at each facility type;
3. Different emission calculation methodologies for different source types;
4. In some cases, more than one emission estimation methodology is available for a specific source type;
5. Cooperation from multiple departments (Environmental, Measurement, Plant Services, and Operations) will be necessary.

The development of quality monitoring plans for Subpart W is just one example of the myriad of new compliance requirements that will be required as part of this rule. Companies such as El Paso with facilities in multiple states regulated by the new rule will be required to put into motion several practical compliance measures, including development of monitoring plans as soon as the rule is finalized. In the Q&As, the EPA estimates that 3 months should be adequate to develop a monitoring plan and that the plan may “rely on existing corporate documents like “SOPs” and Monitoring Plans developed for compliance with other air programs”. The regulation contains the following statement in 98.3(g)(5)(C)(ii):

“The GHG Monitoring Plan may rely on references to existing corporate documents (e.g., standard operating procedures, quality assurance programs under appendix F to 40 CFR part 60 or appendix B to 40 CFR part 75, and other documents)...”

However, for facilities in the petroleum and natural gas sector including facilities meeting the definition of a gas processing plant under NSPS KKK, there are no existing air programs that require fugitive emission monitoring in a way prescribed in the proposed regulation. Therefore, the assumption that a monitoring plan may rely on existing company documents is incorrect. If the regulation is finalized in September 2010, only about three months will be available to

develop and rollout the monitoring plans. Therefore, El Paso suggests for: 1) allowing additional time to develop quality monitoring plans for compliance with Subpart W, i.e. at least until April 1, 2011; and 2) incorporating similar special provisions for reporting year 2011, as currently prescribed under Section 98.3(d), allowing the use of best available monitoring methods in the first quarter of 2011 for any parameter (i.e., inlet/outlet metered volumes, GHG concentrations of inlet/outlet gas to/from various emissions sources, GHG concentrations of underground storage gas, etc.) that cannot reasonably be measured according to monitoring and QA/QC requirements of a relevant subpart.

In summary, El Paso requests EPA allow additional time to develop appropriate compliance programs and tools required by the new Subpart W rule.

2. Inexperience

GHG accounting is fairly new for most companies outside the electric sector. Most companies will require significant resources and time to comply with the regulations. Even if EPA finalizes the Subpart W reporting rule by the third quarter of 2010, it will not be possible for the regulated community to set up systems and programs within a few months of a final rule nor can the regulated community set up the program early due to uncertainties as to what will be included in the final rule. El Paso is one of only a few natural gas companies to carry out voluntary monitoring and research of fugitive monitoring methods. Moreover, there is no approved, standardized protocol to carry out such monitoring. Therefore, once the monitoring methods outlined in proposed rule are finalized, reporters will need to ensure that they are familiar with the requirements and that appropriate monitoring and compliance plans are developed to ensure compliance. El Paso does not believe that implementation of monitoring program and completion of all required measurements and monitoring can be accomplished by December 31, 2011.

3. Limited Resources & Contractors

Currently the human and technological resources necessary to carry out comprehensive monitoring required by Subpart W are limited. Very few personnel within El Paso are currently familiar with the monitoring equipment and trained to conduct such measurements. In addition, outside contractors familiar with the monitoring devices and in a position to carry out extensive monitoring at El Paso facilities are limited to a handful. Per the PRCI report⁵⁹, over 1500+ components can be expected to be monitored per pipeline facility under the EPA proposed rule. We have estimated over a million components for our exploration and production business unit. Please see Appendix II for additional details. The proposed schedule is, therefore, impossible to meet considering practical resource constraints.

4. Monitoring Program Implementation Challenges

a) Safety - Leak measurements at natural gas compressor stations are conducted in an

⁵⁹ PR-246-9526, T. Howard, R. Kantamaneni, and G. Jones December 1998.

environment with numerous safety challenges:

The proposed schedule is too aggressive to allow regulated entities and their contractors to adequately train the field employees who will do the actual monitoring work. Training is required in important safety measures to keep sampling personnel safe, and sampling techniques to help ensure the data collected is reasonably accurate. In addition, transportation and schedule will present significant challenges on the aggressive schedule EPA has proposed.

1) Possibility of explosive concentrations. Any work in a facility will require either equipment of a type referred to by safety professionals as “intrinsically safe” equipment or a “Hot Work” permit (which requires periodic screening to verify that gas concentrations in the area of work remain below safe levels). Leak measurements require that personnel specifically go to the area where explosive concentrations are most likely to be present. This is particularly true on measurements for vented components where leak rates are potentially larger than at standard components, which could result in explosive concentrations of gas in the air around the personnel during sampling. It is critical that personnel are properly trained how to remain safe in such environment. Examples of hazards include bringing manlift bucket circuitry (which is usually not intrinsically safe) within the gas cloud, striking the steel vent pipe with any material which might cause a spark (including being bumped by the manlift or by metal fittings on harnesses), losing control of a vent bag filled with natural gas, which could be blown onto a hot surface such as an exhaust stack and combust, or inadvertently venting natural gas through the High-Flow Sampler to a location where large concentrations are not expected. Static electricity discharges may also be a risk factor.

2) Fall Risk. Measurements at elevated vents require personnel to use man-lifts, ladders, or roof access, usually on sloped roofs. This requires training in fall protection equipment including harnesses and lanyards and proper tie off techniques. The installation of taps into the vent stacks inside the building or at a location more easily accessible near ground level would eliminate fall risk. But the installation of these will take considerable time to complete for compressors that are anticipated to be applicable to Subpart W monitoring requirements (approximately 1,315 at El Paso’s facilities alone). In addition, tag and lock-out procedures on the downstream compressor units would be needed to prevent the presence of natural gas during the vent stack piping modifications which typically could only be done during the limited maintenance window discussed in the section below.

3) High Pressure Gas. Hazards involve the possibility that a component will break off and vent gas during sampling or that a blow down will occur at a vent while it is being measured. Injury could result should a measurement specialist have his head or hands in the path of the blow down. Personnel must also be trained properly so that vents such as rod packing vents are not subjected to any significant back-pressure, which could cause safety or operational problems.

4) High Temperatures. The risks from high temperatures include burns from touching hot components as well as heat exhaustion from working near high temperature sources.

5) Moving machinery. Many components are either constantly moving or can move due to remote activation and can cause serious injury should clothing or a body part be caught in the

system.

6) Air Toxics. Measurements at condensate tank vents require additional respiratory personal protective equipment due to the heavier hydrocarbons that may be venting from the tank.

b) Measurement Complexities - Although simple in principle, the proposed measurement techniques require substantial experience to perform correctly. Considerations include:

1) Hi-Flow enclosures must be placed so as not to restrict air flow and allow full capture of leaks.

2) The background probe for the H-Flow sampler must be placed in the correct position to determine if there is any interference from other sources as well as to determine whether or not complete capture of the leak has been achieved.

3) The vent bag technique must be first practiced under metered conditions in order to be confident of the results. Personnel must be aware of how to eliminate potential errors due to leaks, restricted openings, or flow induced by Venturi effects.

4) Some vents may be manifolded together, sometimes going to a larger diameter (six feet) silencer. Larger diameter vent stacks have been measured previously with the use of covers, but this technique requires practice and great attention to safety considerations. It may not be possible to know which source is the leak in these cases.

c) Transportation, scheduling, and maintenance issues – Pipelines and Production Facilities

The proposed rule requires that for each compressor rod packing one measurement in each of the operational modes that occurs during a reporting period is conducted, 98.233(p)(4). However, there is only a limited window for performing routine maintenance on an interstate pipeline system. Performing measurements in all three modes of operations will require potentially stopping and blowing down compressor units,⁶⁰ and starting a unit that is idle⁶¹, which due to safety issues mentioned in Section I(B)(4)(a) of these comments, must be scheduled with or in

⁶⁰ Typically during maintenance of a compressor unit, the engine is blown-down for safety reasons. In addition, if it is determined that the unit isolation valve is leaking at a rate of concern for operations and maintenance personnel, our safety practices would require that further actions be taken to reduce the leak rate. This would first include actions such as re-greasing the unit isolation valve. In limited cases, this may not be sufficient to reduce the leak so the second practice would include putting in a blind flange in the piping to remove the concerns raised by the leaking unit isolation valve. Blind flanges would also be used in the unusual case involving the complete removal of compressor unit for maintenance.

⁶¹ The risk of arbitrarily starting a unit to avoid a certain mode of operation during a survey, such as idle-depressurized, is minimal because: 1) This would require compressor operation in recycle mode (assuming a recycle valve was available for opening) which in turn causes risk of overheating the compressor; and 2) Since El Paso typically operates their pipelines near maximum allowable operating pressure (MAOP), a unit start-up requires that a second unit be stopped to prevent pipeline pressure and flow increases from occurring unless there was an immediate increase in customer demand.

addition to other routine maintenance activities.⁶² For example, on the Tennessee Gas Pipeline (TGP) system, per the tariff, the window for performing routine maintenance would be from May through October. Dual peaking for demand (summer and winter) is met via natural gas fired compressor units.

Peak power loads occur in July through August where 90% of the peak needs are met through natural gas fired turbines. To prevent supply problems in the winter months, the storage fields need to be full by November 1 of each year. Billions of cubic feet of natural gas must be transported and injected into storage prior to the winter heating season.

It is incredibly difficult to schedule down-time for a compressor station on a gas pipeline system. Per the tariff, customers must be informed of any maintenance during the peak season. In fact, schedules are available publicly and can be found at: 1) The following link for each El Paso pipeline subsidiary: <http://elpaso.com/postings/default.asp>; then 2) Reference links on side bar titled “Notices” and “Planned Service Outage”.

In addition, demand can change quickly and without prior notice. At any point, multiple compressor stations may need to respond quickly to changing load (or demand for natural gas) conditions with other multiple compressor stations. Some cities have only a single source of natural gas to rely on. Having a compressor station down can result in considerable loss in capacity. For example, for a typical mainline compressor station this could mean a 200 million cubic foot a day loss in capacity. Further scheduling complications for conducting direct measurements will result for the stations that are unmanned and remotely controlled. Approximately 27% of El Paso’s facilities, located across 42,000 miles of interstate pipeline, are currently manned 24 hrs/day, 7days/wk.

The demand on upstream compressors at exploration and production (E&P) facilities is even greater, thereby shortening the window to conduct maintenance. The movement of upstream compressors from one location to another will complicate further scheduling issues. This coupled with the fact that these compressors are dispersed over a wide geographic area (10 states for El Paso’s E&P) limits the ability to opportunistically conduct the necessary measurements in each mode of operation. Therefore, location-based schedules will need to be developed for each of these compressors. Reciprocating compressors located at well heads or field gathering compression, typically do not have back-up equipment. This will require that a compressor be deliberately shut down for GHG measurements. Significant costs to E&P companies will be incurred due to the loss of production during these deliberate shut downs. (Note, these costs are not represented in El Paso’s alternative cost analysis provided in Appendix II, but would be additional to the average \$732,713 cost for a basin level reporting unit.) It is important for the EPA to recognize that when an upstream compressor is down there are typically other activities such as maintenance or a compressor move simultaneously occurring. Attempting to conduct GHG measurements simultaneously with these activities poses additional safety risks to all

⁶² Per El Paso’s Compressor Operation Policies and Procedures (COPP) Manual, mechanical inspections on reciprocating engines must be completed at a maximum 16,000 hours or 48 month interval. Major overhauls on turbines are required every 30,000 – 48,000 hours depending on turbine manufacturer. Minor inspections on both engine types can occur every 4,000-8,000 hours.

involved employees and contractors.

As noted earlier, El Paso operates about 156 facilities potentially subject to the proposed rule. Most natural gas facilities are located in remote locations and comprise of thousands of relatively small sources (especially those that are sources of fugitive emissions). These facilities often lack the automation to facilitate data collection, retention, analysis and quantification of the GHG sources (especially fugitive emission sources). Therefore, GHG accounting in our sector will continue to rely primarily on manual processes for the intermediate future.

El Paso has taken over 4 years and expended over \$1.5mm to develop a “verifiable grade” inventory for reporting to DOE and CCAR emissions from our US Operations (Figure 1 and Table 1). These costs relate primarily to developing emissions estimates and reporting and do not include comprehensive monitoring program proposed by the EPA under Subpart W. By failing to consider these costs, EPA has disregarded an important aspect of the challenges presented by compliance with the proposed Subpart W.

Table 1: El Paso’s Costs on GHG Emission Inventories (in US \$)

Task	2005	2006	2007	2008	Total
IT/Data base	0	39,406	182,742	115,539	337,686
Inventory, Verification	135,771	244,746	390,984	362,817	1,134,318
Policies & Procedures	5,755	53,723	6,027	3,453	68,958
Grand Total					1,540,962

Figure 1: El Paso’s Costs on GHG Emission Inventories [see original PDF for figure]

Our CCAR submittal in 2008 required over 2700 staff hours to complete the necessary data gathering and analysis, despite three consecutive years of preparing US GHG inventories. This level of effort shows that while we can expect efficiency improvements as we gain experience with GHG reporting, the resources and the time required to complete an emissions inventory are still substantial even after a number of years. Given that EPA’s reporting protocol differs both from the CCAR and the DOE programs, new policies, procedures and systems need to be planned and developed for compliance with the EPA reporting rule. This planning will take significant time for even experienced companies like El Paso. And even after the necessary process optimization and experience, computation of emissions from El Paso facilities, especially those subject to proposed Subpart W, cannot be completed in one quarter after the end of the calendar year, for the above mentioned reasons. Therefore, we request that EPA consider a June 30 submittal deadline for all emission reports related to Subpart W.

Response: EPA has reviewed the comment and does not agree to generally extend the deadline for reporting to June 30. Since reporting of some required sources of emissions are tied to events that may occur only once at the beginning of the year or use of instruments or qualified contractors that may not be available in time for gathering necessary data in 2011, EPA agrees that reporters may apply for use of best available monitoring methods for such data. See responses to comments in Section II.F of the preamble, and today’s final rule, Section 98.234 Special Reporting Provisions.

Moreover, EPA has taken a number of other steps to reduce the reporting burden that will reduce the amount of time needed for reporters to prepare for monitoring in comparison with the proposal. See Section II.F of the preamble.

With regard to measurement of emissions in each operational mode of compressors, EPA did not intend for compressors to be taken offline in order for reporters to collect the data required under subpart W and has clarified today's final rule to allow reporters to conduct annual measurements of each compressor in the mode as it exists at the time the annual measurement is taken. See Section II.F of the preamble and "Compressor Modes and Threshold" in EPA-HQ-OAR-2009-0923.

EPA recognizes that the industry will need to deal with how to organize, train and protect their human resources to efficiently implement the requirements of subpart W. The potential reporting community has been aware of this proposal, including onshore petroleum and gas production as well as natural gas distribution since April of 2010, and since April of 2009 for other sectors, and for many facilities, subpart W is an add-on to subpart C implementation in 2010. Therefore, subpart W represents an expansion and adaptation of these existing systems and plans rather than the development of wholly new plans and systems. For those facilities which are not reporting under subpart C, the economic impact has been adjusted of today's final rule to account for application of screening tools for both facilities that determine they may need to report under subpart W as well as facilities that determine that they may not have to report. For further details, see the Economic Impact Analysis accompanying today's final rule.

Finally, EPA is very aware of safety issue, and today's final rule adds several alternative emissions detection and quantification options to be more cost-effective as well as less hazardous. Nevertheless, EPA expects operating facilities to follow their normal safety policies and procedures when performing emissions detection and quantification. All of the emissions detection and quantification methods of today's final rule have been employed safely in operating facilities. For example, since the IR leak detection cameras are not yet certified intrinsically safe, some operators use them under a "hot work permit." For leaking dump valves in transmission compressor stations, today's final rule allows the alternative to use an acoustical detector calibrated for through-valve leak quantification as an alternative to condensate tank roof vent measurement. This same technique is included for through leaking compressor isolation valves. Where an operator chooses to use an insertion flow meter rather than measure at the end of a vent pipe, EPA estimated sufficient cost to modify the vent piping so that the flow measurement port is in a safe location away from hot or mechanical operating equipment such as a compressor piston rod.

Comment Number: EPA-HQ-OAR-2009-0923-1039-26

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment Excerpt Text:

Implementation Schedule Should Be Delayed or Phased In

As noted in several comments above and discussed below, significant rule implementation challenges exist. INGAA strongly recommends deferring implementation for one year, or, alternatively, a three year phase in period for reporting vented and fugitive sources that require measurement or leak surveys.

INGAA is very concerned with the limited time to implement Subpart W, especially if inter-related items discussed in comments above are not reconciled. For example, comments related to implementation logistics and schedule result in the need for an applicability screening method, alternatives to three-mode testing of reciprocating compressors, evaluation of vent accessibility and related safety concerns, availability of service providers and trained technicians to complete leak surveys and vent measurements, and availability of required technology – e.g., optical cameras.

Even if INGAA comments are addressed to reconcile some of the complexity and conflicts in the Proposed Rule, operators will still be challenged to complete all of the required activities to meet the March 31, 2012 deadline for reporting 2011 emissions. These activities include gathering necessary data, developing internal reporting systems, identifying and installing measurement access points, and completing the required measurements and leak surveys. In the October 2010 Final Rule on Mandatory Reporting, EPA provided the option to use “best available information” at the inception of year one. For Subpart W, there is considerable additional complexity due to measurement and monitoring requirements that have not previously existed for natural gas transmission and storage. These extensive reporting criteria, compared to gathering relatively accessible information such as fuel-use estimates for combustion emission estimates, support an implementation schedule that allows the use of “best available information” for some sources during the initial reporting year. Alternatively, operators should be afforded the ability to phase in reporting of Subpart W emissions over multiple years.

Unlike other industry sectors, such as electricity-generating facilities, the natural gas transmission sector is being required to monitor and measure GHG emissions by implementing new procedures that have not been previously required under the Clean Air Act. Most of INGAA’s members lack: the necessary equipment to implement leak detection and measurement on the scale required; trained personnel to operate that equipment; data management systems to collect, archive, interpret and transmit emissions information; and/or QA-QC procedures to ensure the integrity and completeness of emissions information. Contractors qualified to perform the detection and measurements are also in short supply, and are likely to remain so for at least the initial few years.

As discussed in Comment II above, EPA estimated significant demand for mandated measurement and monitoring, but underestimated the full implications. EPA estimates that there are approximately 1,944 gas transmission facilities in the US. As noted in Comment II, all would have to conduct vent measurement and fugitive monitoring to determine Subpart W applicability. With an estimate of approximately two facilities monitored per week, at least 972 crew-weeks would be required to monitor all facilities within a year. Accounting for the added complexity of addressing reciprocating compressor modal testing, multiple site visits for the same facility

would be required in some cases during a year.

While fewer emission sources require direct measurement in the current Proposed Rule as compared to the 2009 version, three-mode reciprocating compressor testing and additional insight into vent access issues offset those benefits in terms of time to complete facility tests. The availability of experienced company staff or outside contractors with sufficient knowledge to implement provisions related to vent measurement, leak surveys, and associated QA/QC and data development for reporting is very limited. With the addition of monitoring requirements for distribution and onshore production, this shortage is exacerbated. In addition, the time required to develop a properly trained in-house or service provider work force should not be underestimated. Another time-consuming logistical issue will be providing safe access points for roofline vent measurements and some condensate tank vent measurements. These vents would be considered inaccessible under typical LDAR programs and safety concerns associated with these measurements need to be addressed. Collectively, these issues pose huge challenges for rule implementation, especially in the near-term.

Ideally, INGAA recommends postponing the first year of reporting for one year, with 2012 emissions for Subpart W sources to be reported in March 2013. Alternatively, if EPA is unwilling to accept deferring all reporting, INGAA requests that EPA consider alternatives that will facilitate rule implementation. INGAA recommends the following alternative:

- Allow a more limited subset of sources to be reported for 2011 with phase-in of all vented and fugitive sources over three years. INGAA recommends that emissions from combustion, event-based blowdown venting, and pneumatic devices be included in the initial reporting year for all affected facilities in the gas transmission compression and underground storage segments. To facilitate implementation of vent measurement and fugitive leak screening, emissions reporting for these vented and fugitive sources would be phased in over three years, with each company incrementally reporting at least one third of their affected facilities in each of the first three reporting years.

Under this scenario, at least one third of the facilities would report all required emission sources in year 1, at least two thirds would report all required emissions in year 2, and all facilities would report all required emissions in year 3. To address potential concerns regarding facility selection for this phased approach, each company would rank its facilities by size based on the streamlined screening method discussed in Comment II and report the largest third of facilities in year 1, middle third in year 2, and balance in year 3. Thus, since only a subset of emissions are deferred to the second and third reporting years, the vast majority of emissions for these segments would be captured in the initial reporting year.

To address unique sampling issues and safety concerns for vent measurement at larger facilities on the “year one” list (e.g., vents are especially difficult to access or an alternative sample location is not readily available), operators must be allowed to defer select “larger” facilities to a later year. In this case, the safety and accessibility issues would be documented, and the annual “one third” facility criteria would be met by replacing that facility with the next largest facility on the company list. Due to safety concerns and vent measurement implementation complexity, INGAA strongly recommends, per the discussion above, deferring implementation for all

facilities or the phased approach in the previous bullet.

If EPA has concerns with a one year deferral or the 3 year phase in recommendation, INGAA requests additional dialogue to resolve this issue prior to Final Rule promulgation. For discussion purposes, additional examples are provided of implementation phasing, including the following:

- Phase in the facilities that report under Subpart W over multiple years. Sources under Subpart W that are required to report 2010 combustion emissions could be first to report emissions from Subpart W sources (i.e., facility applicability in year one is based solely on combustion emissions), with facilities that are subject due to combustion plus vented and fugitive emissions phasing in reporting in over two additional years. Similar to the discussion in the previous bullet, larger facilities would be able to defer year 1 reporting if vent accessibility issues complicated near-term implementation.
- Allow “best data” for some vented and fugitive sources in year one based on published emission factors. INGAA prefers the previous options over this approach because this exercise would result in year one facility methane emissions that differ from subsequent reporting years based solely on emission estimation methods. This could cause confusion to outside reviewers of the information. A phased approach for reporting fugitive and vented emissions will not compromise program integrity. In addition, possible data quality and operator safety impacts will not be compromised due to a rush to address rule requirements. Even if issues identified in other comments are addressed (e.g., an alternative to three-mode testing; an applicability screening method), INGAA still strongly believes that additional time is justified to properly implement the Rule. If the related INGAA comments that discuss scheduling complexity and logistics are not reconciled in the Final Rule, the schedule is infeasible and it is highly unlikely that all Petroleum and Natural Gas Systems facilities will be able to adequately address all requirements in the allotted time.

Response: EPA has reviewed the comment and addressed these issues in the response to EPA-HQ-OAR-2009-0923-1011-27. Regarding a phased approach to subpart W, EPA considered which sources and circumstances warranted such an approach and today’s final rule phases compressor emissions over a three year period and provides for best available monitoring methods under specific circumstances. See response to comments in Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1011-34

Organization: El Paso Corporation

Commenter: Fiji George

Comment Excerpt Text:

Section 98.232 GHGs to report: Considering practical concerns in complying with a March 31, 2012 initial reporting deadline, El Paso recommends a “transitional” program to phase in affected Subpart W facilities into full reporting per EPA final methods by 2015.

Due to the time constraints and monitoring implementation challenges previously mentioned, El Paso recommends a phased-in approach that will transition to full reporting using EPA methods by 2015. As noted below, our recommendations are meant to transition into meaningful and accurate reporting while considering practical issues in estimating and reporting emissions to meet EPA’s planning needs.

A. A transitional plan for the natural gas sector will have minimal overall impact to EPA and/or Congress’s future programs related to GHGs.

Figure 3 indicates that over 85% of the U.S. emissions are combustion related and most of these emissions will be reported under existing finalized EPA reporting methods under Subpart C.

Figure 3: 2008 Greenhouse Gas Emissions by Gas (percents based on Tg CO₂ Eq.). Reproduced from Figure ES-4 EPA Inventory.⁶³

Table 3: 2008 Greenhouse Gas Emissions for the Natural Gas Industry and the U.S. (Tg CO₂ equivalent)

	Energy Related CO ₂ Emissions	Non-Combustion CO ₂ Emissions	CO ₂	CH ₄	Total CO ₂ e
Production	47.5	8.5	56.0	14.1	70.1
Processing	19.5	21.4	40.9	13.0	53.9
Transmission and Storage	35.4	0.1	35.5	39.4	74.9
Distribution	0	0	0.0	29.9	29.9
Gas Industry Total	102.4	30.0	132.4	96.4	228.8
U.S. Total			5,905.5	567.3	6,946.1
Gas Industry Share of U.S.			2.2%	17.0%	3.3%
Transmission Share of U.S.			0.6%	6.9%	1.1%

As noted in Table 3, the total natural gas industry’s share, including combustion, of the US emissions is about 3.3% with combustion emissions that are already planned to be reported under Subpart C at over 57% of the total natural gas system profile. In other words, per this EPA inventory,⁶⁴ about 43% of the emissions are intended to be regulated under proposed Subpart W. Even if the current estimation methodologies have uncertainty (e.g. compressor stations at 50%

⁶³ EPA 430-R-10-006, INVENTORY OF U.S. GREENHOUSE GAS EMISSIONS AND SINKS: 1990 – 2008, APRIL 15, 2010,

⁶⁴ EPA has stated that the inventory developed under EPA 430-R-10-006 under estimates methane related emissions from the natural gas sector, yet this is the same inventory used in all current legislative bills and forms the basis in all international negotiations including the Copenhagen Accord.

uncertainty per Table 4), it would have minimal impact - about 48 million metric tons of maximum under-statement per the official EPA inventory and uncertainty factors developed as part of previous rulemaking- to overall future greenhouse gas plans for the entire country. It should be clearly noted that even the proposed EPA methods have significant uncertainties.

Table 4: Uncertainty Estimates by Methodology

	Share of Total Emission	Uncertainty Estimates		
		Engr. Est	Hybrid	CEMS
Electricity generation (ARP, non-ARP, and MSW)	57%	10%	8%	7%
Industrial gas manufacturing				
Fluorocarbon producers	13%	50%	10%	7%
Imports/exports of industrial gases-SF7	3%	50%	10%	7%
Electricity generation (ARP, non-ARP, and MSW)	57%	10%	8%	7%
Industrial				
Petroleum refineries	7%	18%	7%	7%
Pulp, paper, and paperboard mills	3%	22%	10%	7%
Iron and steel mills	2%	15%	25%	7%
Cement manufacturing	1%	17%	9%	7%
Oil gas and mining				
Gas processing	1%	50%	30%	7%
Compressor stations	2%	50%	30%	7%
Weighted Average		19.7%	9.4%	7.0%

Note: Uncertainty estimates for the three options are presented as point estimates. Uncertainty ranges were not available for all sectors.

Source: Table 5-9, March 2009, Regulatory Impact Analysis for the Mandatory Reporting of Greenhouse Gas Emissions Proposed Rule (GHG Reporting), Final Report

Note: Uncertainty estimates for the three options are presented as point estimates. Uncertainty ranges were not available for all sectors.

As noted earlier, EPA states that one of the main reasons for a March 31, 2012 comprehensive report for Subpart W sources is its need to develop future GHG policy and regulatory programs [for natural gas systems].

Current legislative proposals, if enacted, would pre-empt EPA authority under Clean Air Act and instead control GHG emissions, including emissions from natural gas systems, under a new statutory program. El Paso’s alternative proposals outlined below will provide the appropriate emissions data to EPA for its future stated purposes of, among other things, informing the legislative process. El Paso’s suggested alternative will also help reduce the significant potential for error and enforcement concerns of the proposed Subpart W program for both EPA and the regulated communities.

We urge the EPA to consider reasonable transition approaches for Subpart W applicable facilities as outlined below.

El Paso recommends two temporary transition alternatives to phase in reporting for Subpart W

facilities. These recommendations arise from our concerns related to timing and expectations of this proposed rule and are necessary to enable industry to gain experience and safely collect and report emissions data that are reasonably accurate and meaningful and useful for the EPA. These transition provisions will be more than adequate for EPA to receive emissions reports from such facilities and use the reports received to plan for future programs--including improving Subpart W methods.

1. Limiting Approach

Under this approach, for the March 2012 report, the EPA will require only facilities that are subject to Subpart C, to report all their GHG emissions including their Subpart W sources using final EPA monitoring and reporting methods. Under this approach, the 2012 reporting will be limited to sources that are over the 25,000 metric tons threshold for Subpart C. Thereafter, additional facilities will be added to the monitoring requirements over the next three years so that, by March 2015, all subject facilities will report using the methods specified in EPA’s final rule. This concept is outlined in Table 5.

Table 5: Limiting Approach

Reporting Year	Reporting Facilities	GHG Emission Sources
2011	All “facilities” subject to Subpart C	All Subpart C and W sources identified by the EPA in final rule for the 2011 facilities.
2012	2011 facilities + 1/3 of the remaining facilities over 25,000 metric tons in combined emissions	All Subpart C and W sources identified by the EPA in final rule for the 2012 facilities.
2013	2011 facilities+ 2/3 of the remaining facilities over 25,000 metric tons in combined emissions	All Subpart C and W sources identified by the EPA in final rule for the 2013 facilities.
2014	All facilities over 25,000 metric tons in combined emissions	All Subpart C and W sources identified by the EPA in final rule for the 2014 facilities.

2. Phased in – “Hybrid” Approach: EPA Method + Best Available Data/Methods

Under this approach, EPA will receive emissions reports from all facilities over 25,000 metric tons. In 2012, 75% of the affected facilities owned or operated by a reporter will use standard industry recognized methodologies (i.e., API Compendium, INGAA Guidelines, etc.) or internal monitoring data to report its emissions. The remaining 25% of the facilities will adhere to the final EPA required methods for monitoring and reporting. As noted in Table 6, by 2015, all facilities will transition to reporting using EPA methods.

**Table 6: Phased-in “Hybrid” Approach
100% Reporting of Facilities over 25K MT/yr CO₂e**

Reporting Year	Reporting Method for Subpart W Sources
2011	75% - Industry methodologies/best available data 25% - EPA final methods
2012	50% - Industry methodologies/best available data 50% - EPA final methods
2013	25% - Industry methodologies/best available data 75% - EPA final methods
2014	All facilities use EPA methods

The advantage of this is that EPA will receive emissions data for planning purposes from all facilities over 25,000 metric tons. All Subpart W methods have associated uncertainties. We have already established that using conservative EPA estimates of an overall uncertainty of 50%;⁶⁵ therefore, the net impact of using industry best available methods for reporting is negligible for immediate EPA planning. This hybrid approach provides EPA a fair assessment of the emissions from the regulated facilities while allowing regulated facilities gain experience and set up programs and policies to achieve full reporting by 2015.

Response: EPA has reviewed the comment, and while the Agency does not agree with the suggested alternative reporting approaches, EPA has determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W by January 1, 2011. As such, EPA considered each source and the reporting compliance requirements and determined it appropriate to allow the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today’s final rule. Further EPA cannot prognosticate what future legislative programs may be nor their substance nor breadth and such is not the mission of any regulatory agency so it is not appropriate to fashion any data collection program based upon what some might believe will be the future of the manner of any GHG regulation. To inform the character and breadth of any such programs is one of the driving purposes in gathering information about GHGs.

Regarding use of a phase-in approach, EPA does not agree that subpart W reporting of primarily methane emissions is less significant to informing future policy than combustion CO₂ emissions, nor that a delay in reporting is either prudent or necessary. Many changes have been made of today’s final rule to reduce burden, broaden methods and provide extensions of time where necessary. For further information please see response to comment in Section II.F of the preamble and response to EPA-HQ-OAR-2009-0923-1039-26.

⁶⁵ Assuming here that EPA proposed methods have no uncertainty and all natural gas systems have an overall 50% uncertainty in existing methodologies.

Comment Number: EMAIL-0002-3 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923)

Organization: Gas Processors Association

Commenter:

Comment Excerpt Text:

Proposed effective date is impractical.

It appears EPA is targeting publication of the finalized Subpart W in late 3rd quarter or early 4th quarter 2010, with an effective date of January 1, 2011. If the rule is finalized as proposed, there will be certain monitoring that will not be practical to implement prior to January 1, 2011 and adequate time will not be allowed for the regulated community to do basic planning for implementation of the new rule.

A specific example of the impracticality of a January 1, 2011 implementation date is related to the requirement to conduct an annual survey using as optical gas imaging instrument at each gas plant and gathering compressor station. Under the currently proposed Subpart W, many companies will have hundreds of individual facilities to survey, which will require they commence surveys in January 2011 in order to accomplish the work in 2011. Today few companies or consultants own optical imaging equipment, which can cost over \$100,000 for one instrument. The result is companies and consultants will have to purchase the equipment, conduct training, and gain sufficient experience in a very short period prior to January 1, 2011. Not only is that impractical, but GPA questions the ability of suppliers to provide enough optical imaging cameras to conduct the required surveys in 2011. Another example is related to Acid Gas Removal Vents which are required to have gas meters into and out of AGR unit. Not all AGR units employ this metering today and it is impractical to expect meters to be specified, purchased and installed in a period of three months or less. Similar examples exist with compressor seal vents and rod packing vents, on which many operators will elect to install permanent meters; and on flares which some operators will elect to install additional metering. In both cases it is impractical to expect installation within a few months, by January 1, 2011. As a result, GPA recommends EPA allow use of best available data for the first half of 2011 for all sources subject to the new Subpart W.

Response: EPA has reviewed the comment and has determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements by January 1, 2011. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today’s final rule Section 98.234(f) special reporting provisions.

Sources mentioned by the commenter, such as reciprocating compressor rod packing vents, centrifugal compressor wet seal oil degassing vents, and acid gas removal vents are eligible for the use best available monitoring methods. For information regarding the timing for allowing

application of best available monitoring methods and other details, please refer to today's final rule.

With regard to equipment such as the optical gas imaging instrument, today's final rule has been modified to include the options to use OVA/TVA devices or infrared laser beam illuminated instruments for leak detection for all emissions sources across all industry segments with the exception of inaccessible sources. Please see response to EPA-HQ-OAR-2009-0923-1039-26.

Comment Number: EPA-HQ-OAR-2009-0923-0055-7

Organization: Indaco Air Quality Services, Inc.

Commenter: Touche Howard

Comment Excerpt Text:

By adopting a phased in approach, EPA can solve two challenges at once. First, there is considerable uncertainty as to how to determine which facilities will meet the 25,000 ton per year threshold. Although some companies have conducted fugitive emission surveys that provide a basis for estimating which facilities should be included, many have not and have no actual data on which to make their estimates.

Because companies are currently reporting facilities under Subpart C, this provides an excellent starting point for the Subpart W reporting criteria. The first year of reporting under Subpart W could be limited to facilities already required to report emissions under Subpart C. This would provide a definitive guideline for which facilities would report and would probably include at least 50% of all pipeline facilities.

This approach would allow companies more time to build the capacity to collect accurate data. Additionally, the fugitive emissions data collected during the first year of Subpart W could then be used to calculate which additional facilities should be included under Subpart W in subsequent years.

A further discussion of safety concerns and measurement challenges is provided in the Appendix of this letter.

Response: With regard to uncertainty as to how to determine which facilities will meet the 25,000 ton per year threshold, EPA now plans to develop voluntary screening tools for each petroleum and natural gas industry segment. These tools would be guide to determine those facilities that are well below the reporting threshold, those above, and those close to the threshold who will need to collect further data to make a proper determination. For further information, please see response to EPA-HQ-OAR-2009-0923-1039-26.

EPA has considered this comment and while the Agency does not agree with the suggestion that the first year of reporting under Subpart W should be limited to facilities already required to report emissions under Subpart C, EPA has determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements. As such, EPA is allowing the use of best available monitoring

methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other steps EPA has taken to reduce reporting burden and safety issues, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as the Section II.E and II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-0837-7

Organization: Canadian Gas Association

Commenter: Michael Cleland

Comment Excerpt Text:

There is considerable merit in deferring the reporting requirements for the LDC sector until EPA has established a broader database of field data to support its proposed approach and emission factors. Such a deferment would allow EPA and LDCs the time to implement a program to develop better emission factors, optimize the quantification approaches so as to maximize reduction benefits, and better manage monitoring costs. In our experience, collaboratively supported field research can be a cost-effective way to improve data quality on an industry-wide basis. While the current proposed rule risks substantially increasing reporting costs for LDCs, it is not certain that this investment will materially improve the accuracy of emissions data.

- Allow alternative methods and emission factors: We recommend that EPA allow LDCs additional flexibility to estimate fugitives where accuracy can be improved. For example, the use of the default population emission factors multiplied by miles of pipe typically overstates emissions from buried pipe. An alternative method, based on company-specific leak repair data can generate more representative estimates. We also would caution that the entire distribution sector in both the US and Canada continues to rely on the comparatively few buried pipe measurements conducted as part of the much earlier GRI-EPA work and we would encourage EPA to support further work to improve buried pipe leak data.

It is also reasonable that all LDC systems will not have the same per-activity factor emissions rates, since newer systems are likely to have lower fugitive losses than older systems. For example, as operational differences become evident (Aldyl A pipe is an example), more focus on the emissions from this particular source might be appropriate and less on newer plastic pipe installations. The reporting rule should encourage LDCs to focus on those areas of their system which result in the greatest fugitive losses, and in turn this could help drive the fundamental research. Such an approach would be consistent with the asset management approach.

We also note that the industry has, and continues to spend, millions of dollars to replace cast iron and unprotected steel pipe. In Canada, only one LDC today has cast iron pipe in service and this is planned to be phased out by 2012.

Response: EPA reviewed these comments, but does not intend to defer the reporting requirements for the LDC sector until a broader database of field data exists to support its proposed approach and emission factors. The reporting requirements for this sector incorporate the most up to date emission factors from published data for different pipe systems and for surface equipment leaks. While it would be ideal to have a widely accepted and definitive set of

emission factors for every equipment source for every sector, EPA is obligated to proceed with the Mandatory Reporting Rule, and is utilizing the best emissions factors currently available.

Today's final rule is allowing additional alternative leak detection methods and approaches to quantification that are considered sufficient for informing future policy. EPA may consider new leak quantification data when it becomes available in the future. In nearly 40 years of the U.S. VOC Leak Detection and Repair (LDAR) program in petroleum refineries and chemical plants, there has been no compelling data to support statistically different leak factors for new equipment versus old of the same technology (i.e. same materials and construction). The current public data for methane emissions from petroleum and natural gas systems used for the emissions factors of today's final rule are not sufficient to make any correlation of leak rate and age of equipment. Finally, as discussed in the preamble of today's final rule, EPA selected the most significant emissions sources in each industry segment by an 80/20 rule outlined in the Technical Support Document (TSD) for today's final rule found in docket (EPA-HQ-OAR-2009-0923).

Comment Number: EPA-HQ-OAR-2009-0923-1004-13

Organization: Natural Gas Supply Association

Commenter: Patricia W. Jagtiani

Comment Excerpt Text:

EPA Must Provide More Time for the Onshore Petroleum and Natural Gas Production Sector to Comply

Assuming EPA finalizes Subpart W in September of this year (as the agency has previously indicated it would do), NGSA members will have only three months of lead time to put in place the monitoring equipment, data collection procedures, and personnel needed to comply with the new GHG reporting requirements. This is simply infeasible due to the number of facilities in our sector and the fact that most of the equipment in the field lacks the metering equipment and detailed component inventories called for in the proposed Subpart W. In addition, most companies in the onshore petroleum and natural gas sector are still occupied with implementing the requirements in the existing Mandatory Reporting Rule, and will not be able to focus on complying with new Subpart W requirements until after the first year of data collection under the Mandatory Reporting Rule is complete.

Thus, NGSA strongly supports the American Petroleum Institute's proposal that the proposed Subpart W be implemented in phases over several years, allowing for an orderly transition to the new requirements. For example, in the first year of reporting under Subpart W, EPA could require that reporting entities provide data on the 25 percent of wellheads with the greatest production throughput, with reporting expanded to the remaining wellheads over a period of two to three years. During this phase-in period, EPA should allow reporting entities to rely on "best available monitoring methods" to estimate emissions for equipment that has not yet been phased into full reporting under Subpart W. This approach would allow EPA to begin to gather data from onshore petroleum and natural gas production in 2011, while providing a reasonable timetable for industry to ensure proper compliance with the new Subpart W.

Response: EPA has considered this comment and addressed these issues in response to EPA-HQ-OAR-2009-0923-1011-27, as well as Section II.F of the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1015-2

Organization: The Petroleum Association of Wyoming

Commenter: John Robitaille

Comment Excerpt Text:

General Comments - Timeframe to Implement Compliance and Best Available Monitoring Method (BAMM) Opportunities

Overall, PAW is concerned by the extraordinarily short timeline this rule offers in order to come into compliance. As detailed below, there are direct monitoring and measurement requirements for sites that have previously been unregulated for air emissions. If the rule becomes finalized as early as September, that leaves only the last quarter of 2010 to implement monitoring and direct measurement strategies (where necessary), with no "Best Available Monitoring Method" allowed. Furthermore, there is direct calibration requirements required PRIOR to the reporting year – it will be nearly impossible to find enough staff and contractors to perform those calibrations prior to January 1, 2011.

BAMM should be allowed for sources based on the reporting sector. Oil and natural gas production should be given the opportunity for BAMM because of the volume of sources they are required to report which have previously been unregulated for air emissions. Simply put, if this rule becomes final in September, it is not enough time to even identify which sources will be required to directly measure emissions prior to the end of the first quarter 2011, when some direct emission sampling will be required to have been completed.

Response: EPA has reviewed and agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and for other steps taken of today's final rule to reduce reporting burden, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as Sections II.E and II.F of the preamble of today's final rule.

In addition, today's final rule allows broad use of engineering estimates based on best available data in place of flow measurements that may require calibration; hence the issue of calibration prior to January 1, 2011, no longer exists.

Comment Number: EPA-HQ-OAR-2009-0923-1060-2

Organization: Yates Petroleum Corporation

Commenter:

Comment Excerpt Text:

General Comments - Timeframe to Implement Compliance and Best Available Monitoring Method (BAMM) Opportunities

Overall, Yates is concerned by the extraordinarily short timeline this rule offers in order to come into compliance. As detailed below, there are direct monitoring and measurement requirements for sites that have previously been unregulated for air emissions. If the rule becomes finalized as early as September, that leaves only the last quarter of 2010 to implement monitoring and direct measurement strategies (where necessary), with no “Best Available Monitoring Method” allowed. Furthermore, there are direct calibration requirements required PRIOR to the reporting year – it will be nearly impossible to find enough staff and contractors to perform those calibrations prior to January 1, 2011.

BAMM should be allowed for sources based on the reporting sector. Oil and natural gas production should be given the opportunity for BAMM because of the volume of sources they are required to report which have previously been unregulated for air emissions. Simply put, if this rule becomes final in September, it is not enough time to even identify which sources will be required to directly measure emissions prior to the end of the first quarter 2011, when some direct emission sampling will be required to have been completed. Furthermore, there are significant numbers of sources requiring direct measurement. As required in 98.234(b) – Monitoring and QA/QC requirements, “All flow meters, composition analyzers, and pressure gauges that are used to provide data for the GHG emissions calculations shall use measurement methods, maintenance practices, and calibration methods, prior to the first reporting year and in each subsequent reporting year ...” Calibrating all meters, composition analyzers and pressure gauges PRIOR to the reporting year will be nearly impossible given the number of components to be calibrated. At the least, operators should have the ability to use best available data for the first quarter of 2011. Furthermore, acid gas removal stacks will require the installation of not one, but TWO meters that must meet these requirements. Three months is simply not enough time to implement the requirements outlined in the rule as written.

Yates recommends that EPA provides BAMM opportunities for the first reporting year.

Response: EPA has reviewed these comments and addressed them in the response to EPA-HQ-OAR-2009-0923-1011-27, EPA-HQ-OAR-2009-0923-1004-13 as well as today’s final rule. EPA does not require the installation of permanent flow meters for acid gas removal vents. However for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1167-26

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Adopt a Three-Year Phase-In Implementation Schedule

There is insufficient time for industry to implement a program of this magnitude on January 1, 2011. Implementation should be delayed one year. Additionally, for all the reasons set forth above, a phase in approach for the rule is strongly recommended regardless of when reporting begins. Noble believes that a phased approach for emissions estimation and measurement will provide a reasonable pace for collection of quality data to meet inventory objectives. In addition, a phased approach to rule implementation is necessary to develop estimation tools, training materials, and data management systems; hire and train personnel; specify, purchase, calibrate, and install measurement equipment; allow service provider growth to match demand; and reduce the cost burden.

Noble requests that EPA consider several possible alternatives that will facilitate rule implementation. Alternatives to consider include:

1. Phase in the emission sources that must be reported over multiple years— i.e., only a subset of the Subpart W and Subpart C onshore production emission sources become affected for the first few years of the rule. Noble recommends the following implementation schedule:

Year 1 – Emission sources that can be estimated using emission factors with readily available associated activity data (i.e. equipment counts and process rates) and combustion sources that do not require installation of fuel flow or hour meters. This will also allow the development of database systems required to collect and track the quantity of data required by the Proposed Rule. Based on the proposed rule, these would include: Coal Bed Methane Produced Water Emissions, Natural Gas Driven Pneumatic Pumps, Natural Gas Pneumatic Bleed Devices (Low), Natural Gas Pneumatic Bleed Devices (High), Gathering Pipeline Fugitives, EOR Injection Pump Blowdowns, Dehydrator (Desiccant) Venting, Gas Well Venting During Conventional Completions and Workovers, and Components. This schedule is based on final rule inclusion of the Noble Energy Comment II recommendation for alternative, streamlined emission estimation methods and approaches; specifically, “representative sampling and measurements to develop emission factors / data to estimate entire population emissions rather than test or sample every emission source.” That is, this schedule is not feasible if every well and pipeline must be surveyed.

Year 2 – Emission sources that require the collection of process samples development of additional safety procedures (i.e. for sampling high pressure process streams such as separators). Based on the proposed rule, these would include: Production Storage Tanks, Produced Water Dissolved CO₂, Hydrocarbon Liquids Dissolved CO₂, and Dehydrator (Glycol) Vent Stacks. This schedule is based on final rule inclusion of the Noble Energy Comment II recommendation for alternative, streamlined emission estimation methods and approaches; specifically, “representative sampling and measurements to develop emission factors / data to estimate entire population emissions rather than test or sample every emission source.” That is, this schedule is not feasible if every storage tank and separator must be surveyed.

Year 3 – Emission sources that require direct emission measurements, installation of equipment to measure process flow rates, development of additional safety procedures (i.e. for sampling elevated compressor vents), and/or acquiring data from third party operators. These would

include the remaining emission sources identified in the proposed rule.

After EPA has received and analyzed the data from Year 3, Noble recommends that EPA revisit collection data needs based on data gaps and policy decisions that may require additional data or have sufficient data (and reporting would no longer be required).

Response: While EPA disagrees with the suggestion of a phased approach to rule implementation, it agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data), please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as Sections II.E and II.F of the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1197-4

Organization: NiSource, Inc.

Commenter: Kelly Carmichael

Comment Excerpt Text:

Phased Implementation - Requirements of the proposed rules must either be delayed for a year or a phased approach must be implemented over the next three reporting years. The reason for delay is the extent of new monitoring and measurement requirements, difficulties associated with safe access to the affected sources, and limited availability of trained NiSource technicians and qualified contractors. In case of a phased in approach, NiSource proposes reporting of combustion and some vented emissions from all affected facilities during the first year. Remaining vent measurements and leak monitoring to be phased-in after the first year.

Response: EPA has deliberated, and disagrees with the recommendation that the rule must either be delayed for a year or a phased approach must be implemented over the next three reporting years. Please refer to the response to comment EPA-HQ-OAR-2009-0923-1167-26. However for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1202-11

Organization: Enterprise Products

Commenter: Rodney Sartor

Comment Excerpt Text:

Resources and BMM – Considering the timeline that the EPA has proposed for finalizing Subpart W, late 3rd quarter or early 4th quarter of 2010, we recommend the use of BMM for the entirety of the 2011 reporting year in order to properly evaluate and implement monitoring and data collection for Subpart W.

a. As currently proposed, the timeline from finalization to implementation seems entirely unrealistic. If finalized at a similar period in the year as Subpart C (i.e. October 30), this would give industry approximately two months to evaluate and implement all aspects of the proposed program. This could potentially lead to extensive non-compliance or poorly executed implementation and would be detrimental to the proper integration of Subpart W requirements.

b. Due to the number of facilities and sources required to be evaluated, Enterprise would have to acquire several more optical gas imaging devices. Based on informal inquiries with several suppliers, the current backlog on these instruments is approximately three to six months and could potentially be longer in the face of increased demand.

c. In light of the number of facilities that will be required to evaluate (as the rule s currently written) an exact inventory may not be able to be developed for every facility within the first reporting year. As such, we propose using BMM to only create an equipment inventory of fugitive sources. This inventory would be reported to the EPA by March 2012.

Response: EPA has considered this comment, and while it does not agree with the recommendation suggesting the use of BMM for the entirety of the 2011 reporting year, EPA, however, agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule.

In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to the response to EPA-HQ-OAR-2009-0923-1011-27. EPA will also allow the application for the extension of the use of best available monitoring methods beyond 2011 for extreme circumstances. Please see the preamble Section II.F.

With regard to equipment such as the optical gas imaging devices, today's final rule has been modified to include the options to use OVA/TVA devices or infrared laser beam illuminated instruments for leak detection for all emissions sources across all industry segments with the exception of inaccessible sources. For further detail, please see response to EPA-HQ-OAR-2009-0923-1039-26.

Comment Number: EPA-HQ-OAR-2009-0923-1206-18

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

The proposed effective date is impractical.

It appears EPA is targeting publication of the finalized Subpart W in late 3rd quarter or early 4th quarter 2010, with an effective date of January 1, 2011. If the rule is finalized as proposed, there will be certain monitoring that will not be practical to implement for reporting of emissions during 2011, and adequate time will not be allowed for the regulated community to do basic planning for implementation of the new rule.

A specific example of the impracticality of a January 1, 2011, implementation date is related to the requirement to conduct an annual survey using an optical gas imaging instrument at each gas plant and gathering compressor station. Under the currently proposed Subpart W, many companies will have hundreds of individual facilities to survey, which will require they commence surveys in January 2011 in order to accomplish the work in 2011. Today few companies or consultants own optical imaging equipment, which can cost over \$100,000 for one instrument. The result is companies and consultants will have to purchase the equipment, conduct training, and gain sufficient experience in a very short period prior to January 1, 2011. Not only is that impractical, but GPA questions the ability of suppliers to provide enough optical imaging cameras to conduct the required surveys in 2011.

Another example is related to Acid Gas Removal Vents, which are required to have gas meters into and out of AGR units. Not all AGR units employ this metering today, and it is impractical to expect meters to be specified, purchased and installed in a period of three months or less. Similar examples exist with compressor seal vents and rod packing vents, on which many operators will elect to install permanent meters; on flares which some operators will elect to install additional metering; and on compressors under § 98.236(c)(18)(i) where it appears to require the throughput of each affected compressor to be reported, which would require the installation of new flow meters on each compressor (see Comment 9, below, for additional discussion of this proposed requirement).

In these cases, and others, it is impractical to expect compliance with specified monitoring methods for 2011. As a result, GPA strongly recommends EPA allow use of best available monitoring methods (“BAMM”) for estimating emissions during calendar 2011 for all sources subject to the new Subpart W.

Response: EPA has reviewed these comments, and today’s final rule eliminates reporting of gathering systems. See Section II.F of the preamble. While EPA does not agree with the recommendation suggesting the use of best available monitoring methods for estimating emissions during calendar 2011 for all sources subject to the new Subpart W, EPA does agree that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of this subpart. For further information please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today’s final rule.

With regard to metering of acid gas removal vents, EPA is now allowing the use of best available monitoring methods. For information please see response to comment EPA-HQ-OAR-2009-0923-1060-2 and today’s final rule.

In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

With regard to equipment such as the optical gas imaging devices, today's final rule has been modified to include additional options for leak detection. For further information, see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1297-7

Organization: Southern Ute Growth Fund

Commenter: Lynn Woomer

Comment Excerpt Text:

As understood, the proposed rule is expected to be finalized at best, late fall 2010, with it becoming effective January 1, 2011. Considering this time period, many sources will be challenged with Subpart W compliance starting day one. Due to the uncertainty of changes that may appear in the final rule, affected source preparation is very limited in time and resources, particularly when the rule, as proposed will aggregate numerous oil and gas sites basin wide. Operator and Service (providers) resources will be strained as some sites will require surveys utilizing optical imaging, as other sites may require the installation of equipment (i.e. meters); thus it does not seem reasonable for operators to meet full compliance upon the effective date. Therefore, should the EPA decide on continuing with the expected timeframe, the SUGF highly recommends EPA allow usage of Best Available Monitoring Methods during the first year the rule is implemented.

Response: EPA has deliberated and agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

With regard to equipment such as the optical gas imaging devices, today's final rule has been modified to include the options to use OVA/TVA devices or infrared laser beam illuminated instruments for leak detection for all emissions sources across all industry segments with the exception of inaccessible sources. For further detail, please see response to EPA-HQ-OAR-2009-0923-1039-26.

With regard to installation of meters, today's final rule has clarified that emissions from centrifugal and reciprocating compressors do not require the installation of a permanent flow meter; use of a portable meter and port are acceptable. In addition, compressor throughput flow meters are not required; Section 98.236 Data reporting requirements now specifies that engineering estimates of compressor flow will be sufficient for EPA's requirements.

Comment Number: EPA-HQ-OAR-2009-0923-1298-63

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Another example is related to acid gas removal (AGR) vents that are required to have gas meters measuring flow into and out of AGR units. Not all AGR units employ this metering today, and it is impractical to expect meters to be specified, purchased and installed in a period of three months or less. Similar examples exist with compressor seal vents and rod packing vents on which many operators will elect to install permanent meters; on flares which some operators will elect to install additional metering; and on compressors where Section 98.236(b)(19)(i) requires the throughput of each affected compressor to be reported, which would require the installation of a flow meter on each compressor.

It is unrealistic to expect compliance with specified monitoring methods beginning January 1, 2011. As a result, IPAMS requests that EPA delay the effective date of the rule to January 1, 2012, or allow the use of Best Available Monitoring Methods (BAMM) for estimating emissions during calendar year 2011 for all sources subject to Subpart W.

#2: Best Available Monitoring Methods (BAMM): The provision for the use of BAMM stated in Section 98.3(d)(1) is exclusive to the subparts that were finalized in 2009 and were implemented on January 1, 2010. Due to the extensive comprehensive nature of the monitoring required by Subpart W that is not currently being conducted by this affected industrial category, IPAMS requests that EPA incorporate an amendment to Section 98.3(d)(1) that either: 1) allows those subject to any subpart that will be implemented January 1, 2011, to use BAMM during calendar year 2011, or 2) if EPA delays the effective date to January 1, 2012, allows those subject to any subpart that will be implemented January 1, 2012, to use BAMM from January 1, 2012, through June 30, 2012. BAMM should extend to all source types, not just those requiring direct measurements, but also engineering estimates, population counts, and leak detection for the reasons cited in General Comment #1, above.

Response: EPA has reviewed this comment and agrees that for specified emissions sources for certain industry segments and under certain circumstances reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as Section II.F of the preamble of today's final rule. EPA is not delaying reporting to January 2012 for all segments and sources. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

EPA does not require the installation of any permanent flow meters in subpart W. However for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-0837-11

Organization: Canadian Gas Association

Commenter: Michael Cleland

Comment Excerpt Text:

From our LDC experience in Canada, we are also cognizant of the substantial learning curve and capacity building that will be needed to comply with the proposed reporting rule. Fugitive emissions are particularly challenging due to the large numbers of geographically dispersed sites to be surveyed, getting access to qualified contractors, providing employee training, establishing the necessary activity data records, and managing the volume of data to be reported. We would encourage EPA to consider deferring the proposed rule to allow the industry time to put in place the necessary capacity to comply with the reporting rule.

Response: EPA has reviewed this comment, and while it does not agree with the suggestion of deferring the rule, EPA has determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as Section II.F of the preamble of today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1042-2

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment Excerpt Text:

Extending the timeline for data collection and reporting. As proposed, data collection will begin January 1, 2011 with a first report required March 31, 2012. If the final rule is published in September 2010 as EPA intends, ConocoPhillips will have only three months to understand the requirements of the new rule, determine applicability, and implement data collection and management systems. From experience with implementing the 2009 final rule for our refineries and other facilities subject to Subpart C (Gas Processing Plants and Offshore Production), this schedule is unreasonable. The complexities and ambiguity of the 2009 final rule resulted in several months of discussions among Industry Trade groups and EPA to just understand the requirements of the final rule.

Response: EPA has deliberated, and while it does not agree with the suggestion of extending the timeline for data collection and reporting, EPA has determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for

allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

EPA will also be providing screening tools to assist in determining applicability (See Section II.F of the preamble).

Comment Number: EPA-HQ-OAR-2009-0923-1061-8

Organization: Texas Pipeline Association

Commenter: Patrick J. Nugent

Comment Excerpt Text:

The proposed schedule for monitoring and reporting is impractical. The rule would require monitoring to begin in 2011 with first report due in March 2012. Yet the rule is not likely to be finalized until the latter part of 2010, meaning that there will only be a few months between the time the rule is finalized and the time operators must begin to monitor emissions. This will not be enough time to put some of the required equipment into place. For example, it will take a substantial amount of time to install meters and-to-spec them out so that mass balance calculations on amine units can be performed. Accordingly, EPA should provide a six months' lead time, at a minimum, between the time the rule is finalized and the time when emissions monitoring must first begin to be performed by operators.

Response: EPA has considered and does not agree with the suggestion of providing a six months' lead time between the time the rule is finalized and the time when emissions monitoring must first begin. EPA has, however, determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

With regard to installation of meters, today's final rule has clarified that emissions from centrifugal and reciprocating compressors do not require the installation of a permanent flow meter; use of a portable meter and port are acceptable. In addition, compressor throughput flow meters are not required; estimates of compressor flow will be sufficient for EPA's requirements. Please see today's final rule for more details.

Comment Number: EPA-HQ-OAR-2009-0923-1074-1

Organization: WBI HOLDINGS

Commenter:

Comment Excerpt Text:

Comment: WBIH recommends the implementation schedule for reporting fugitive emissions be delayed for at least one calendar year, until calendar year 2012.

EPA has stated that "data are crucial to the timely development of future GHG policy and regulatory programs." The proposed implementation schedule does not provide adequate time to prepare for the monitoring and measurement, specifically for fugitive emissions, and specifically for industry segments not currently required to monitor and measure fugitive emissions under current permitting programs, i.e. onshore petroleum and natural gas production, and onshore natural gas transmission compression facilities and underground natural gas storage. Additionally, emission factors for fugitive emissions are not consistent between current guidance documents, creating significant potential for fugitive emissions data inaccuracies. If data is crucial to the development of future GHG policy and regulatory programs, WBIH is certain that EPA does not want to use inaccurate data on which to base policy and regulatory program development.

Response: EPA has considered, and while it does not agree with the suggestion of delaying the implementation schedule by one year, EPA has determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, Section II.F of the preamble of today's final rule.

In today's final rule, EPA used the best publicly available population and leaker emission factors. Please see response to comment EPA-HQ-OAR-2009-0923-1299-5. Application of these emission factors with component population counts or leak detection will provide an adequate basis for emissions estimations to inform future policy for this source.

Comment Number: EPA-HQ-OAR-2009-0923-1080-26

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

Aka recommends that EPA delay implementation of this rule until data year 2012 so that the many recognized problems in the written rule, such as need for better definitions, can be adequately addressed. Additionally, it will allow time for manufacture of equipment, installation of equipment, development of procedures, and training of personnel that is necessary for compliance with such a far reaching rule. This will allow the regulated community to collect meaningful and plausible data for GHG planning purposes.

Response: EPA has reviewed the comment and does not agree with the suggestion of delaying the implementation of the rule until year 2012. EPA has, however, determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply

with the monitoring and QA/QC requirements. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, Section II.F in the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1080-39

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

The rule should allow adequate time for development of equipment and expertise necessary for compliance.

It appears EPA is targeting publication of the finalized Subpart W in late 3rd quarter or early 4th quarter 2010, with an effective date of January 1, 2011. If the rule is finalized as proposed, there will be certain monitoring that will not be practical to implement prior to January 1, 2011, and adequate time will not be allowed for the regulated community to do basic planning for implementation of the new rule.

A specific example of the impracticality of a January 1, 2011, implementation date is related to the requirement to conduct an annual survey using an optical gas imaging instrument at each gas plant and gathering compressor station. Under the currently proposed Subpart W, many companies will have hundreds of individual facilities to survey, which will require they commence surveys in January 2011 in order to accomplish the work in 2011. Today few companies or consultants own optical imaging equipment, which can cost over \$100,000 for one instrument. The result is companies and consultants will have to purchase the equipment, conduct training, and gain sufficient experience in a very short period prior to January 1, 2011. Not only is that impractical, but we question the ability of suppliers to provide enough optical imaging cameras to conduct the required surveys in 2011.

Response: EPA has considered and determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

With regard to equipment such as the optical gas imaging devices, today's final rule has been modified to include the options to use OVA/TVA devices or infrared laser beam illuminated instruments for leak detection for all emissions sources across all industry segments with the

exception of inaccessible sources. For further detail, please see response to EPA-HQ-OAR-2009-0923-1039-26.

Comment Number: EPA-HQ-OAR-2009-0923-1098-3

Organization: Southern Union Company

Commenter: Charles Wait

Comment Excerpt Text:

SU supports the INGAA proposal to phase in implementation. Many of the sources requiring direct measurement are located such that safety may be an issue. INGAA provided a photo of one such measurement predicament where a man lift was fully extended at a low angle on soft ground. This places personnel at risk of injury should the lift tip while measurements are taking place. Additionally, facilities are at risk. If the lift were to tip while being extended over above ground piping, damage to that pipe could occur, possibly forcing a shutdown of facilities to facilitate repair. Time is required to make worker/process safety assessments; then revise vent piping if required to bring sampling points into a safer work area. This would alleviate the risk of preventable damage to facilities and lower the risk of injury.

Response: EPA has considered and does not agree with the suggestion to phase in implementation of today's final rule. EPA has, however, determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule.

In addition, EPA has added options for quantifying emissions as alternative to direct measurement of today's final rule. For example:

- For condensate tank emissions at transmission compressor stations (i.e. leaking scrubber dump valves), these emissions can also be estimated by the alternative of testing the dump valve directly with an acoustic detector that has an algorithm to estimate through valve leakage flow.
- Reciprocating compressor packing vents and blowdown vents also allow use of an acoustic detector that quantifies flow. Measurement can also be done by simple piping reconfiguration to put a leg of the vent piping out where it can be easily accessible for insertion of a portable flow meter (e.g. hot wire anemometer)
- Centrifugal compressor wet seal oil degassing vent and blowdown vents can also use the acoustic detector for through leaking blowdown valves.
- All compressor isolation valves can be measured at the blowdown vent or, alternatively, with an acoustic detector at the valves themselves.

EPA does not anticipate extending use of best available monitoring methods beyond 2011 as over fourteen months will have passed since the Administrator's signature; however, under

extreme and unique circumstances, which include safety, EPA may consider granting a further extension. For further details, please refer to today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1152-5

Organization: Consumer Energy Company

Commenter: Amy Kapuga

Comment Excerpt Text:

EPA Should Postpone or Phase-In Subpart W Pending Development of More Accurate Emission Factors

As described above, AGA, EPA and GRI are currently working to develop new emission factors for natural gas production, transmission, LNG and underground storage and distribution equipment based on field testing that will not be completed until 2012 or 2013, depending on the availability of funding. It makes no sense to impose a costly reporting requirement now that will necessarily require our members to divert resources to reporting emissions using old, inaccurate emission factors. Instead, EPA should postpone Subpart W for two years to allow the agency and Consumers to focus resources on expediting the work on developing updated, more accurate emission factors.

In the alternative, EPA should phase-in Subpart W as new emission factors become available for the sectors that will be subject to reporting under this Subpart. Distribution operations should be excluded, but if EPA declines to exclude distribution systems from Subpart W, then the reporting requirements should be phased-in to allow the use of new emission factors.

Response: EPA reviewed this comment, however does not agree that the implementation of subpart W should be postponed by two years as new emission factors are being developed. EPA has determined that use of the rule emission factors with component population counts or leak detection will provide a suitable basis for informing future policy. EPA may consider new emission factor studies to update emission factors in today's final rule, but will not delay implementation for that reason.

Comment Number: EPA-HQ-OAR-2009-0923-1154-8

Organization: Latham & Watkins LLP

Commenter: Matthew C. Brewer

Comment Excerpt Text:

The January 1, 2011 Proposed Effective Date For The Rule Is Impractical

As explained in the Gas Processors Association Comments on the Proposed Rule, if EPA finalizes the Proposed Subpart W in the late 3rd quarter or early 4th quarter 2010, with an effective date of January 1, 2011 as proposed, there will be certain monitoring that will not be practical to implement prior to the effective date, and adequate time will not be allowed for the regulated community to complete basic planning for implementation of the new rule. A specific

example of the impracticality of the January 1, 2011 implementation date is related to the purchase and installation of meters. Under the Proposed Subpart W, DCP would need to procure and install more than 2,000 meters in the short period prior to January 1, 2011. We question the ability of suppliers to provide enough meters in this timeframe for DCP Midstream, let alone the entire natural gas processing industry. As a result, DCP endorses GPA's recommendation that regardless of any other potential modifications to the Proposed Rule, EPA allow use of best available data 2011 for all sources subject to the new Subpart W.

Response: EPA has deliberated and does not agree with the suggestion of allowing use of best available data 2011 for all sources subject to Subpart W. EPA has, however, determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of this subpart. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule.

With regard to installation of meters, today's final rule has clarified that emissions from centrifugal and reciprocating compressors do not require the installation of a permanent flow meter; use of a portable meter and port are acceptable. In addition, compressor throughput flow meters are not required; estimates of compressor flow will be sufficient for EPA's requirements. Please see today's final rule for more details.

Comment Number: EPA-HQ-OAR-2009-0923-1167-24

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

A "phased-in" program as discussed in Comment III. A program that phases in different emission sources over a period of years will allow adequate time to acquire equipment, train personnel, and develop programmatic requirements such as data documentation and record-keeping. This approach would also facilitate data quality because more time will be available to address each program element.

Additional time is warranted for Subpart W implementation. It is not feasible to implement a program to collect the large amount of data required to report GHG emissions for the affected Subpart W and Subpart C emission sources in the Proposed Rule timeframe. The Proposed Rule implementation schedule should be delayed and/or emission source applicability should be phased in.

Response: EPA has considered and does not agree with the suggestion of delaying or phasing in the implementation of today's final rule. However for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1170-10

Organization: Pioneer

Commenter: Gretchen Kern

Comment Excerpt Text:

The proposed effective date is impracticable

The preamble states that monitoring will begin on January 1, 2011 and reporting is required by March 31, 2012, and annually thereafter. It appears that this Subpart is expected to be finalized in the 3rd or 4th quarter 2010 and this will give operators just weeks to prepare for the massive monitoring and calculations that will need to be conducted throughout the year, beginning on January 1. As stated above, this Subpart is expected to affect every one of Pioneer's asset areas in the U.S., and the data gathering will be a massive undertaking. In the Permian Basin alone, Pioneer operates over 6,000 active wells and approximately 1,800 tank batteries; an average tank battery has numerous potential fugitive emission points that, based on the requirements of this rule, will need to be counted at each battery. Further, all of the sampling requirements discussed above will need to be performed to comply with this Subpart. In preparation for this enormous data-gathering exercise, Pioneer would need to employ additional personnel, as well as purchase a GHG software package to track, manage and calculate all of these data and aggregate the emissions totals for each source (from the list of 21 sources in the Onshore Oil and Natural Gas Production and the 9 sources in the Gas Processing segments of this Subpart) to enable Pioneer to report per EPA's requirements. Therefore, this is unrealistic and again, will unduly burden Pioneer and the industry as a whole.

10. Onshore petroleum and natural gas production segment in Subpart W should be delayed

In furtherance of points 8 and 9 respectively, illustrating that compliance with this rule will be unduly expensive and the timing for implementation of the rule is unrealistic, Pioneer requests that the Onshore Petroleum and Natural Gas Production segment of the final rule be delayed, pending a reevaluation of the Economic Impact Analysis and rationalization of the rule requirements, rule approaches, burden and cost/benefit analysis (i.e. amount of representative, useful, and quality emissions covered) . Since this segment was not included in the Subpart W proposal published in 2009, operators subject to this segment did not have the opportunity to comment and express the extreme hardship of these requirements. Now this Subpart is expected to be finalized later this year and Pioneer is just now in the early stages of digesting the enormity of this segment. For reasons stated above in points 8 and 9, tracking the GHG emissions from every wellhead and battery in operation in our onshore production areas, since every basin we operate is expected to exceed the 25,000 tons/year threshold, beginning on January 1 of next year would require a tremendous initiative at Pioneer.

Based on the above points, Pioneer recommends the EPA revise Subpart W and utilize all opportunities to simplify the requirements and reduce the burden. In addition, Pioneer agrees with API's request that EPA phase implementation of the rule in over a period of several years.

Response: EPA has considered and does not agree with the suggestion of delaying or phasing in the implementation of today's final rule. Please refer to the response to EPA-HQ-OAR-2009-

0923-1167-26. EPA has, however, determined that for specified emissions sources for certain industry segments and under certain circumstances reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, Section II.F in the preamble of today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

Specific comments on cost issues are addressed in Section III.B.2 of the preamble, as well as in Volume 10 of the Response to Comments document.

Comment Number: EPA-HQ-OAR-2009-0923-1197-2

Organization: NiSource, Inc.

Commenter: Kelly Carmichael

Comment Excerpt Text:

NiSource has a major compliance concern about the length of time it may potentially have to implement this proposed rule once it goes final. The business units that will be impacted within NiSource are,

- electric generation,
- electric transmission and distribution,
- natural gas transmission,
- natural gas storage, and
- natural gas distribution

We at NiSource are anticipating that this proposed rule will be finalized sometime in September - October of this year. We are also expecting that the final rule will take effect on January 1, 2011.

Response: EPA agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

EPA will also be providing screening tools to assist in determining applicability (See Section II.F of the preamble).

Comment Number: EPA-HQ-OAR-2009-0923-1198-7

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment Excerpt Text:

WVONGA also requests that the effective date of this rule be extended for one year. As proposed, affected entities would have very little time to prepare for the requirements imposed by this rule. Companies already have budgets in place this year that would most certainly not be adequate to ensure compliance with the proposal. Even though Subpart W was previously proposed, it did not include the onerous requirements set forth in the second proposal. Industry would need additional time to prepare for complying with this more burdensome proposal.

Response: EPA has considered and disagrees that the effective date of this rule should be extended for one year. EPA, however, agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

Specific comments on cost issues are addressed in Section III.B.2, of the preamble as well as in Volume 10 of the Response to Comments document.

Comment Number: EPA-HQ-OAR-2009-0923-1206-51

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

On a related issue, Section 98.236(c)(18) requires reporting the gas throughput for each compressor. The metering required for this reporting is not typically in place today and would require installation of meters on each compressor at a cost of about \$100,000 per meter. If a company has 1000 compressors, the capital cost to collect this one piece of operational data is \$100 million for data this is not even necessary for calculating emissions from a compressor rod packing. These meters would have to be in place by January 1, 2011 in order to capture the data for reporting full year data in 2011. In addition to being excessively costly, this will be impossible to accomplish if the rule is not finalized until late 2010.

Response: EPA did not intend to require metering of compressor throughputs. Estimates of compressor flow will be sufficient for EPA's requirements. Please see Section 98.236 of today's final rule for more details.

Comment Number: EPA-HQ-OAR-2009-0923-1298-2

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

In general, IPAMS believes the scope of the rule is very expansive, and the implementation schedule is too aggressive. The rule will require significant cost and effort to comply within a short period of time, and will be especially difficult for small independent operators. Given that the rule is very far reaching and will affect all aspects of operations, IPAMS recommends that EPA extend the implementation period for the rule by a year, thereby requiring reporting to start January 1, 2012, to enable companies to acquire the additional equipment and put the necessary processes in place to effectively gather the data. In addition, the final rule will not be available until the fall of 2010, leaving a very short time for companies to begin planning their implementation for a January 1, 2011 start.

Response: EPA has reviewed and disagrees that the implementation period of this rule should be extended for one year. EPA, however, agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F of the preamble of today's final rule.

EPA will also be providing screening tools to assist in determining applicability (See Section II.F of the preamble)

Comment Number: EPA-HQ-OAR-2009-0923-1298-6

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Since the reporting of greenhouse gases is a new requirement, time is necessary to determine applicability and develop the technical expertise.

Response: Upon further review EPA will be providing screening tools to assist in determining applicability (See Section II.F of the preamble). Concerning the availability of trained operators, for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F.

Comment Number: EPA-HQ-OAR-2009-0923-1298-61

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

Effective Date: EPA is targeting publication of the finalized Subpart W in late third quarter or early fourth quarter 2010, with an effective date of January 1, 2011. If the rule is finalized as proposed, there will be certain monitoring that will not be practical to implement prior to January 1, 2011, and adequate time will not be allowed for the regulated community to do basic planning for implementation of the new rule.

Response: For a response to this comment, please see the response to EPA-HQ-OAR-2009-0923-1298-2.

Comment Number: EPA-HQ-OAR-2009-0923-1298-62

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment Excerpt Text:

A specific example of the impracticality of a January 1, 2011, implementation date is related to the requirement to conduct an annual survey using an optical gas imaging instrument at each gas plant and gathering compressor station. Under the currently proposed Subpart W, many companies will have hundreds of individual facilities to survey, which will require commencing surveys in January 2011 in order to accomplish the work in 2011. Today, few companies or consultants own optical imaging equipment, which can cost over \$100,000 for a single instrument. The result is companies and consultants will have to purchase the equipment, conduct training, and gain sufficient experience in a very short period prior to January 1, 2011. Not only is that impractical, but IPAMS questions the ability of suppliers to provide enough optical imaging cameras to conduct the required surveys in 2011.

Response: Upon further review EPA recognizes the need to further evaluate and allow comparable alternative methods for detection of equipment leaks in specified emissions sources. EPA has evaluated alternative methods for their viability and comparative accuracy to the optical gas imaging instrument in the proposed rule. Today's final rule has been modified to include the options to use OVA/TVA devices or infrared laser beam illuminated instruments for leak detection for all emissions sources across all industry segments with the exception of inaccessible sources. For further detail, please see today's final rule. In addition, for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F.

Moreover, gathering and boosting compressor stations are not included in today's final rule, so the extent of monitoring is reduced from the commenter's perspective based on the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002). Please see Sections II.E and II.F of the preamble to today's final rule for a discussion.

Comment Number: EPA-HQ-OAR-2009-0923-1305-4

Organization: BP America, Inc.

Commenter: Karen St. John

Comment Excerpt Text:

In the event that sub-basin entity grouping of fields is not acceptable to EPA, a phased implementation of the rule over a period of several years will be necessary to fully understand the requirement of the rule, inventory all sources subject to the rule, and develop data collection systems, etc. to comply with the rule.

Response: EPA has considered and does not agree with the suggestion of delaying or phasing in the implementation of today's final rule. Please refer to the response to EPA-HQ-OAR-2009-0923-1167-26. EPA has, however, determined that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1306-14

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

The timetable for implementing Subpart W is too aggressive and does not allow LDCs adequate time to budget and plan for implementation that will begin on January 1, 2011.

The concerns and issues identified in the previous sections suggest that EPA's timetable for implementing Subpart W for natural gas LDCs is too aggressive and will present severe challenges to DTE Energy as well as the rest of the natural gas distribution industry segment if implementation of the rule is required beginning January 1, 2011. Assuming finalization of the rule as proposed in late 2010, we would be immediately faced with the following challenges:

- * Developing a leak detection program that can be applied to each of the applicable industry segments
- * Ordering the necessary leak detection equipment (which could be in short supply)
- * Procuring resources (e.g. internal or contractors) to conduct the leak surveys
- * Providing equipment training to equipment operators
- * Conducting component population counts (e.g. meters, regulators, valves, etc.) at each of the applicable source types
- * Establishing the framework for a leak detection and emission monitoring database that will be utilized to calculate and report GHG emissions

Meeting these challenges will require more than 2 to 3 months to budget and plan properly for compliance with the rule.

Response: Upon further review EPA agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule. In addition, EPA has taken a number of other steps to reduce the reporting burden (while sustaining the necessary quality of data). Please refer to Sections II.E and II.F in the preamble of today's final rule. With regard to equipment such as the optical gas imaging devices, today's final rule has been modified to include the options to use OVA/TVA devices or infrared laser beam illuminated instruments for leak detection for all emissions sources across all industry segments with the exception of inaccessible sources. For further detail, please see response to EPA-HQ-OAR-2009-0923-1039-26.

Comment Number: EPA-HQ-OAR-2009-0923-1306-4

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

The timetable for implementing Subpart W is too aggressive and does not allow LDCs adequate time to budget and plan for implementation that will begin on January 1, 2011

Response: EPA agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, as well as today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1306-9

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

However, if EPA chooses to retain the natural gas distribution segment, then we recommend that the GHG monitoring requirement be postponed to beyond 2011 to allow time to clarify requirements and prepare for implementation

Response: EPA has reviewed and disagrees that the implementation of this rule should be postponed to beyond 2011 for the natural gas distribution segment. EPA has incorporated a number of modifications of today's final rule to clarify requirements for the natural gas distribution sector. These modifications, including clarifying that customer meters are not included in today's final rule, are identified in Sections II.E and II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1041-4

Organization: Spectra Energy Corp

Commenter: Brianne Metzger-Doran

Comment Excerpt Text:

The Subpart W Implementation Schedule Should Be Phased

Spectra Energy is extremely concerned with the schedule proposed for implementing Subpart W. As the INGAA comments make clear, operators will be challenged to complete all of the activities contemplated by the Proposed Rule to meet a March 31, 2012 deadline for reporting 2011 emissions. Spectra Energy supports INGAA's proposal to delay the first year of reporting for one year, with 2012 emissions for Subpart W sources reported in March 2013. Alternatively, if EPA is unwilling to defer reporting entirely for one year, Spectra Energy supports INGAA's proposal (i) to allow reporting of a more limited subset of sources for 2011, or (ii) to phase in reporting of Subpart W emissions over multiple years, or (iii) to allow use of "best available information" over the first year of reporting.

Similarly, should EPA allow continuous aggregated measurement of manifolded vent lines, Spectra Energy submits that it and other operators may not be able to install meters at all covered facilities by January 1, 2011. For this reason, Spectra Energy supports the ability to use annualized data derived from the period after measurement devices are installed for the first year of reporting at these facilities. Spectra Energy believes that a calendar quarter of reliably measured data could be used to calculate and report an annualized total without sacrificing any significant data quality.

Response: EPA has deliberated and disagrees that the implementation of this rule should be delayed. EPA, however, agrees that compressor emissions should be phased over three years. In addition for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding phased compressor emissions see EPA-HQ-OAR-2009-0923 "Compressor Modes and Threshold." For application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, Section II.F in the preamble of today's final rule.

EPA disagrees that continuous monitoring of manifolded vent lines is an acceptable alternative to monitoring of source-by-source emissions. Please see the response to EPA-HQ-OAR-2009-0923-1039-16 in Volume 12 of the Response to Comments.

With regard to reporters being unable to install necessary monitoring equipment prior to the reporting period, it may apply for the use of best available monitoring methods under specific conditions and requirements. For more information, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1080-40

Organization: Aka Energy Group, LLC

Commenter: Barbara Wickman

Comment Excerpt Text:

AKA recommends EPA allow use of best available monitoring methods (“BAMM”) for estimating emissions during calendar 2011 for all sources subject to the new subpart W. It is impractical to expect compliance with specified monitoring methods by January 1, 2011.

Response: EPA has reviewed and disagrees with the suggestion to allow use of best available monitoring methods for estimating emissions during calendar 2011 for all sources. EPA, however, agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of this subpart. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, Section II.F in the preamble of today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1167-25

Organization: Noble Energy, Inc

Commenter: Brian K. Lockard

Comment Excerpt Text:

Ideally, Noble recommends postponing the first year of reporting for one year, with 2012 emissions for Subpart W sources reported in March 2013. An alternative to the first year reporting would be to conduct an industry wide survey to complete population prevalence and GHG emissions estimates of the sources considered in this proposed rule. The need for this refined industry GHG inventory is discussed in Comment II. A stepwise process that builds upon the prevalent priority sources could then be established. This evaluation would provide more certainty for insignificant sources, and reduce the list of emission sources required to report.

Response: EPA has deliberated and disagrees with the suggestions of postponing the rule or conducting an industry wide survey. Postponing the rule is not acceptable as subpart W has already been delayed by a year (for most segments), and it is essential that emissions and activity data collection be initiated as soon as possible to help inform future policy on this important sector of the economy.

Comment Number: EPA-HQ-OAR-2009-0923-1206-23

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Further, the provision for the use of best available monitoring methods stated in Section 98.3(d)(1) is exclusive to the subparts that were finalized in 2009 and were implemented January

1, 2010. Due to the extensive comprehensive nature of the monitoring required by Subpart W that is not currently being conducted by this affected industrial category, we request that EPA incorporate an amendment to Section 98.3(d)(1) that allows those subject to any subpart that will be implemented January 1, 2011, to use BMM for emissions for calendar year 2011.

Response: EPA has reviewed and disagrees with the suggestion to allow use of best available monitoring methods for all sources in any subpart implemented in calendar year 2011. EPA, however, agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of Subpart W. As such, EPA is allowing the use of best available monitoring methods under certain circumstances and for certain categories. EPA will also consider the merit of a petition for unforeseen circumstances. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, Section II.F in the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1206-5

Organization: Gas Processors Association

Commenter: Jeff Applekamp

Comment Excerpt Text:

Third, the proposed rule would become effective for the 2011 reporting year. Assuming the final rule is issued late this year, affected sources would have only a few short months or weeks prior to the start of the reporting year to take the myriad steps needed to assure compliance. This short implementation period is wholly inadequate and likely will thrust many affected sources into impossible compliance situations. At a minimum, EPA should allow for the use of Best Available Monitoring Methods for the entire first year of 2011.

Response: EPA agrees that for specified emissions sources for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements of today's final rule. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1011-27, and Section II.F in the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1155-8

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

The proposed rule requires data collection to begin in 2011, with data submitted to the EPA by March 31, 2012. EPA notes: "... the data are crucial to the timely development of future GHG policy and regulatory programs. In the Appropriation Act, Congress requested EPA to develop this reporting program on an expedited schedule, and Congressional inquiries along with public comments reinforce that data collection for calendar year 2011 is a priority. Delaying data

collection until calendar year 2012 would mean the data would not be received until 2013, which would likely be too late for many ongoing GHG policy and program development needs [emphasis added].”⁶⁶

For all of the important reasons EPA has recognized here and in the broader MRR rulemaking record, see, e.g., 74 Fed. Reg. at 16,455-56, 16,461, these data are critical and our members and the public have a right to timely disclosure of these data. We are deeply concerned by EPA’s failure to promulgate final greenhouse gas reporting requirements for petroleum and natural gas systems by June 2009, as required by law. Both our members and policymakers need this information in order to take urgent action to protect our communities from greenhouse gas emissions, climate change and related harm. The review and implementation process for Subpart W should be held to a tight timeframe so as to avoid further delay. Data collection should begin no later than 2011, and be publicly reported as early as possible in 2012.

Response: EPA agrees that data collection should begin as soon as possible. Please see response to EPA-HQ-OAR-2009-0923-3545-1.

Comment Number: EPA-HQ-OAR-2009-0923-1306-19

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment Excerpt Text:

Reporting Threshold

Unlike other Subparts of the GHG Reporting Rule (Part 98), Subpart W does not have a simple test for determining if the 25,000 metric ton CO₂e emission threshold is exceeded. The main financial burden of Subpart W is in performing leak detection and measurement and as is currently written, all facilities would be subject to these procedures to prove they are not required to report. To alleviate this issue, DTE Energy supports implementing a threshold for compressor stations based only on stationary combustion and vented emissions. This threshold could be lower than 25,000 metric tons CO₂e threshold and would attempt to include all facilities that would yield combined combustion, fugitive, and vented CO₂e emissions of 25,000 metric tons or larger.

Response: With regard to uncertainty as to how to determine which facilities will meet the 25,000 ton per year threshold, EPA now plans to develop voluntary screening tools for each petroleum and natural gas industry segment. These tools would be guide to determine those facilities that are well below the reporting threshold, those above, and those close to the threshold who will need to collect further data to make a proper determination. For further information, please see response to EPA-HQ-OAR-2009-0923-1039-26 and Section II.F in the preamble.

⁶⁶ Federal Register Vol. 75, No. 69, 18612. Note that although EPA calls the requirement a “request” in the above paragraph, the 2008 and 2009 Appropriations Act use the term “shall” and establish a mandatory duty for EPA to promulgate a comprehensive mandatory reporting rule for greenhouse gas emissions.

5.2 ONCE IN ALWAYS IN POLICY

No comments received.

5.3 DURATION OF THE REPORTING PROGRAM

No comments received.

VOLUME 6: RELATIONSHIP TO OTHER GHG REPORTING PROGRAMS

6.0 RELATIONSHIP TO OTHER GHG REPORTING PROGRAMS

Comment Number: EPA-HQ-OAR-2009-0923-1155-34

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment Excerpt Text:

Seize Opportunities to Reduce Emissions Directly

In many instances, there is already sufficient data for many GHG emission sources (e.g. compressor seals, flares, pneumatics, well venting, etc.) to support emission control. In these cases, we urge EPA to move swiftly to emission control rule-making, although by separate notice so as not to delay the final GHG mandatory reporting rule.

Controlling leaks that would otherwise have to be monitored can be quite profitable for industry. For example, the government of Alberta, Canada found that it was more cost effective to require mandatory compressor seal detection and repair program than it was to require more rigorous emissions testing and quantification.⁶⁷ Additionally, there is already sufficient industry data to show that pneumatic devices can be converted from high-bleed to low-bleed devices and gas-assist devices can be converted to compressed air assist. Data supplied by industry under the Natural Gas Star Program has shown that well venting ('green completions') are technically feasible under most conditions, and financially attractive. For example, one operator cited a \$128,000 net profit by selling the gas, rather than venting it.⁶⁸

Thus, while we strongly support monitoring these sources, we recommend that EPA, in a separate rulemaking, work to directly control them as well

Response: The purpose of the rulemaking is to collect data in order to inform future Greenhouse Gas emissions policy. Any action EPA takes to regulate greenhouse gases in the oil and gas sector will be addressed in separate rulemakings

6.1 GENERAL CONSISTENCY WITH OTHER REPORTING PROGRAMS

⁶⁷ Alberta, Canada government official statements at May 2008, Western Regional Air Partnership Meeting in Denver, Colorado.

⁶⁸ Williams Experience in Methane Emissions Mitigation, Producers and Processors Technology Transfer Workshop, Western Gas Resources and EPA's Natural Gas STAR Program Rock Springs, WY May 11, 2006.

Comment Number: EPA-HQ-OAR-2009-0923-1018-8

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment Excerpt Text:

CAPP acknowledges that the EPA has many sub-parts under the MRR and that certain activities in the oil and gas sector may be covered under other sub-parts. However, incineration is a key component in the oil and gas sector and appears to be missing from sub-part W. CAPP would like some clarity on what sub-part this activity falls under. Within Sub-part W there also seems to be a disconnect between the information that is required for emission quantification purposes and what is required to be reported to the EPA. In some instances more specific data is required for reporting than a facility was required to collect for quantification purposes, resulting in additional time and effort without providing further benefit to the emissions data. CAPP recommends that consistency be attained between information that is required for quantification and reporting purposes.

Response: EPA did not include incinerators because this source was relatively small in comparison to other emissions sources. Please see the background Technical Support Document (TSD) found in docket (EPA-HQ-OAR-2009-0923-0027) for the April 2010 proposed rule for more detail. Also, please see comment EPA-HQ-OAR-2009-0923-1167-45 for a response to the commenter's concern for the disconnect between data reporting requirement and emission quantification methods.

Comment Number: EPA-HQ-OAR-2009-0923-0582-2

Commenter: Michael Gibbs

Organization: Western Climate Initiative (WCI)

Comment Excerpt Text:

In addition to other greenhouse gas emission reduction strategies, the WCI is currently developing a regional cap-and-trade program. Accurate source specific emissions data is essential for a robust carbon market. We acknowledge that EPA's reporting requirements were not developed with such a market in mind. Considering these different objectives, we suggest that EPA provide the higher tiered monitoring protocols recommended in the attached as voluntary options in the final rules, to support those states and sources interested in gathering the most accurate data practicable.

Response: EPA disagrees with the commenter on providing voluntary methods in the rule in order to meet, for example, regional cap-and-trade program objectives. EPA determined that adding more options to the already existing multiple options to monitor emissions will make the rule confusing and could lead to reporters misconstruing the required options. Furthermore, making a determination of the methodological requirements for this or any other sector to support inclusion in cap and trade programs for greenhouse gases is beyond the scope of this rule.

Comment Number: EPA-HQ-OAR-2009-0923-1016-48

Commenter: Pamela A. Lacey

Organization: American Gas Association, Pamela A. Lacey

Comment Excerpt Text:

Many state PUCs have adopted more stringent regulations that require more frequent leak surveys in non-business districts. We have provided a chart in **Exhibit A** that shows examples of state PUC requirements for leaks surveys. This chart also includes web links to the relevant state PUC rules. The federal leak survey rules in 49 CFR §192.723 allows LDC's to use the most effective equipment appropriate to the situation to detect the leaks in pipes and associated control equipment, such as regulator stations. These practices have been used for decades under the close scrutiny of the state PUCs and PHMSA.

EXHIBIT A

AGA June 11, 2010 Comments on EPA Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems; Proposed Rule
--State Leak Inspection & Reporting Regulations--

<u>New York</u>		
Website Link: http://www3.dps.state.ny.us/N/nyccr16.nsf/Parts/CE503916EE08FC5F85256FC80051EB78?OpenDocument		
<u>Regulation</u>	<u>Program</u>	<u>Overview</u>
New York State Public Service Commission Part 255: 805	Leaks: general	<p>Description: Outlines responsibilities when an operator is notified about a gas leak or gas odor. Every leak must be investigated, classified and repaired in accordance with the codified specifications.</p> <p>Comments: The classification of the leak determines the time in which repair is required. The operator must complete surveillance a minimum of one additional time prior to downgrading a leak. Upgrading a leak requires the operator to repair the leak in less time.</p> <p>Rule Language</p> <ul style="list-style-type: none"> a) Any notification of a gas leak or gas odor, or any notification of damage to facilities by contractors or other outside sources shall constitute the need for prompt action. b) Each operator shall be responsible for the leak investigation, classification, and repair of each leak found on its below-grade system and shall establish a means by which it determines the appropriate surveillance interval at leak locations under frost conditions. c) Leaks found to be on exposed piping or facilities need not be classified; however, each operator shall establish procedures for immediate elimination of potential hazards resulting therefrom. d) The purpose of the leak classification system is to determine the degree or extent of the potential hazard which results from gas leakage and to prescribe remedial actions therefore. e) Classifications shall be made only by individuals who possess training, experience, and knowledge in the field of leak classification and investigation, including extensive association with actual leakage work. The judgment of the aforementioned individuals, based upon all pertinent information and a complete leakage investigation at the scene, will form the basis for the classification. f) Percentages of gas-in-air included hereafter are based on natural gas. Where liquefied petroleum, manufactured or other gases are involved, appropriate adjustment shall be made as may be required, consistent with the lower explosive limit (LEL) of such gas or mixture of gases. g) Prior to downgrading a leak without any repair, at least one additional surveillance at the normal interval is required to verify that a lower class of hazard exists. Except for leaks downgraded to type 3 classification, which do not require a time limit for repair, if a leak is reclassified to a lower hazard level, the original date of discovery determines the time period for repair. In no case shall the time limit for required repair of any leak exceed one year from the date of discovery. This requirement does not apply to leaks classified as type 2 or 2A based on consideration of frost conditions nor to leaks, at the time of discovery, classified at a higher level pending a further, more complete investigation of the leak hazard area. h) When a leak is upgraded to a higher hazard level, the time period for repair is the remaining time based on its original classification or the time allowed for its new classification, whichever is less. This does not apply to leaks classified at a higher hazard level based on consideration of frost conditions nor to leaks, at the time of discovery, classified at a lower level pending a further, more complete investigation of the leak hazard area.

New York (continued)		
Website Link: http://www3.dps.state.ny.us/N/nycr16.nsf/Parts/CE503916EE08FC5F85256FC80051EB78?OpenDocument		
Regulation	Program	Overview
New York State Public Service Commission Part 255: 807	Leaks: records.	<p>Description: Details the leak information operators must record. Operators must document the entire history of a leak, including time of discovery, follow up inspection and repair completed.</p> <p>Comments: The frequency of follow up inspection and timing of repair is determined by the leak classification.</p> <p>Rule Language</p> <p>a) A gas leak record, identified by number, shall be used to depict the entire history of a leak from the time of discovery through the follow-up inspection.</p> <p>b) The record shall contain information as to the nature of the repair and follow-up results.</p> <p>c) Leaks shall only be classified or reclassified by a responsible and experienced individual whose name shall appear on the record.</p> <p>d) The gas leak record shall contain an adequate number of readings from the sample points tested during the leakage investigation to depict the extent of hazardous gas migration, expressed in percent gas-in-air or percent LEL found at the time of classification, reclassification if applicable, surveillance investigations, during leak repair activities, after completion of repairs, and at any follow-up inspections.</p>
New York State Public Service Commission Part 255: 829	Annual report	<p>Description: Natural gas utilities operating in New York State are required to submit a copy of the annual report submitted to United States Department of Transportation (DOT).</p> <p>Comments: This report is submitted on an annual basis.</p> <p>Rule Language</p> <p>Each operator shall submit a copy of the annual report sent to the Office of Pipeline Safety, United States Department of Transportation not later than March 15th of each year.</p>
New York State Public Service Commission Part 255: 831	Reporting safety-related conditions	<p>Description: Natural gas utilities operating in New York State are required to notify the New York State Public Service Commission when safety-related conditions occur, as defined in sections 23 and 25 of title 49, Code of Federal Regulations, Part 191.</p> <p>Comments: Operators who file an Incident Report with the United States Department of Transportation are required to send this report to the New York State Public Service Commission. Operators are required to notify the state regulators within two hours of an accident, leak or incident. When a leak is reported, operators are required to indicate the location of the leak and estimate the property damage, including the cost and volume of gas lost.</p> <p>Rule Language</p>

ADA JUNE 11, 2010 COMMENTS ON EPA MANDATORY REPORTING OF GREENHOUSE GASES, PETROLEUM AND NATURAL GAS SYSTEMS, PROPOSED RULE --State Leak Inspection & Reporting Regulations--

	Each operator shall submit a report on the existence of any of the applicable safety-related conditions involving facilities in service in accordance with sections 23 and 25 of title 49, Code of Federal Regulations, Part 191, Transportation of Natural and Other Gas by Pipeline; Annual Reports, Incident Reports, and Safety Related Condition Reports (as described in section 10.2 of this Title).
--	---

Texas		
Website Link: http://info.sos.state.tx.us/pls/pub/readtacSext.TacPage?sl=R&app=9&p_dir=&p_dloc=&p_ploc=&pg=1&p_tac=&ti=16&pt=1&ch=8&rl=210		
Regulation	Program	Overview
Texas Administrative Code §8.210(e)	Leak Reporting	<p>Description: Natural gas utilities operating in Texas are required to report all underground leaks, all hazardous aboveground leaks and all non-hazardous aboveground leaks. Each operator is required to report all leaks identified and all leaks unrepaired, listed by classification.</p> <p>Frequency: Effective February 4, 2009, the Railroad Commission of Texas required all natural gas distribution pipeline operators to submit leak reports every six months.</p> <p>Comments: Operators are required to submit a written report of the leak discovered within 30 days of the initial notification provided to the state regulators. This written report is provided to both state and federal regulatory agencies. Operators are required to notify the state regulators within two hours of an accident, leak or incident. When a leak is reported, operators are required to indicate the location of the leak and estimate the property damage, including the cost and volume of gas lost.</p> <p>Rule Language</p> <p>For purposes of this subsection, the term "leak" includes all underground leaks, all hazardous above ground leaks, and all non-hazardous above ground leaks that cannot be eliminated by lubrication, adjustment, or tightening. Each operator of a gas distribution system, of a regulated plastic gas gathering line, or of a plastic gas transmission line shall submit to the Division a list of all leaks repaired on its pipeline facilities. Each such operator shall list all leaks identified on all pipeline facilities. Each such operator shall also include the number of unrepaired leaks remaining on the operator's systems by leak grade. Each such operator shall submit leak reports using the Commission's online reporting system, Form PS-95, by July 15 and January 15 of each calendar year, in accordance with the PS-95 Semi-Annual Leak Report Electronic Filing Requirements, set out in the Figure in this subsection. The report submitted on July 15 shall include information from the previous January 1 through the previous June 30. The report submitted on January 15 shall include information from the previous July 1 through the previous December 31. The report includes:</p> <ol style="list-style-type: none"> (1) leak location; (2) facility type; (3) leak classification; (4) pipe size;

--State Leak Inspection & Reporting Regulations--

		(5) pipe type; (6) leak cause; and (7) leak repair method.
--	--	--

Washington

Website Link: <http://apps.leg.wa.gov/wac/default.aspx?cite=480-93>

Regulation	Program	Overview
WAC 480-93-200	Reporting requirements	<p>Description: Natural gas utilities operating in Washington are required to notify state regulators regarding the discovery, monitoring, repairing and documenting of leaks. Operators are required to demonstrate the leak survey and leak investigation process implemented is thorough and gas emergency response is timely.</p> <p>Comments: Operators are required to notify state regulators within two hours of the unintentional ignition of gas. Operators are required to notify state regulators within twenty four hours when there is uncontrolled release of gas for more than two hours and when a high pressure supply or transmission pipeline or a major distribution supply gas pipeline is taken out of service.</p> <p>Rule Language</p> <p>(1) Each gas pipeline company must give notice to the commission by telephone using the emergency notification line (see WAC 480-93-005(8)) within two hours of discovering an incident or hazardous condition arising out of its operations that results in:</p> <ul style="list-style-type: none"> (a) A fatality or personal injury requiring hospitalization; (b) Property damage valued at more than fifty thousand dollars; (c) The evacuation of a building, or a high occupancy structure or area; (d) The unintentional ignition of gas; (e) A pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; or (f) The unscheduled interruption of service furnished by any gas pipeline company to twenty-five or more distribution customers; (g) A significant occurrence, in the judgment of the gas pipeline company, even though it does not meet the criteria of (a) through (g) of this subsection. <p>(2) Each gas pipeline company must give notice to the commission by telephone using the emergency notification line (see WAC 480-93-005(8)) within twenty-four hours of each incident or hazardous condition arising out of its operations that results in:</p> <ul style="list-style-type: none"> (a) The uncontrolled release of gas for more than two hours; (b) The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service;

--State Leak Inspection & Reporting Regulations--

		<p>(c) A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or</p> <p>(d) A gas pipeline pressure exceeding the MAOP.</p> <p>(3) Routine or planned maintenance and operational activities of the gas pipeline company that result in operator-controlled plant and equipment shut downs, reduction in system pressures, flaring or venting of gas, and normal leak repairs are not reportable items under this section.</p>
--	--	---

Washington (continued)

Website Link: <http://apps.leg.wa.gov/wac/default.aspx?cite=480-93>

Regulation	Program	Overview
WAC 480-93-200 (Continued)	Reporting requirements (Continued)	<p>Rule Language (continued)</p> <p>(4) Each gas pipeline company must provide to the commission a written report within thirty days of the initial telephonic report required under subsections (1) and (2) of this section. At a minimum, the written reports must include the following:</p> <ul style="list-style-type: none"> (a) Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; (b) The extent of such injuries and damage; (c) A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; (d) A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; (e) The date and time the gas pipeline company was first notified of the incident; (f) The date and time the gas pipeline company's first responders arrived on-site; (g) The date and time the gas pipeline was made safe; (h) The date, time, and type of any temporary or permanent repair that was made; (i) The cost of the incident to the gas pipeline company; (j) Line type; (k) City and county of incident; and (l) Any other information deemed necessary by the commission. <p>(5) Each gas pipeline company must submit a supplemental report if required information becomes available after the thirty-day report is submitted.</p> <p>(6) Each gas pipeline company must provide to the commission a copy of each failure analysis report completed or received by the gas pipeline company, concerning any incident or hazardous condition due to construction defects or material failure within five days of completion or receipt of such report.</p> <p>(7) Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year:</p> <ul style="list-style-type: none"> (a) A copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1

		<p>annual report required by U.S. Department of Transportation, Office of Pipeline Safety.</p> <p>(b) A report titled, "Damage Prevention Statistics." The Damage Prevention Statistics report must include in detail the following information:</p> <p>(i) Number of gas-related one-call locate requests completed in the field;</p> <p>(ii) Number of third-party damages incurred; and</p> <p>(iii) Cause of damage, where cause of damage is classified as one of the following:</p> <p>(1) Inaccurate locate;</p> <p>(2) Failure to use reasonable care;</p> <p>(3) Excavated prior to a locate being conducted; or</p> <p>(4) Excavator failed to call for a locate.</p>
--	--	---

Washington (continued)		
Website Link: http://apps.leg.wa.gov/wac/default.aspx?cite=480-93		
Regulation	Program	Overview
WAC 480-93-200 <i>(Continued)</i>	Reporting requirements <i>(Continued)</i>	<p>(c) A report detailing all construction defects and material failures resulting in leakage. Each gas pipeline company must categorize the different types of construction defects and material failures anticipated for their system. The report must include the following:</p> <p>(i) Types and numbers of construction defects; and</p> <p>(ii) Types and numbers of material failures.</p> <p>(8) Each gas pipeline company must file with the commission, and with appropriate officials of all municipalities where gas pipeline companies have facilities, the names, addresses, and telephone numbers of the responsible officials of the gas pipeline company who may be contacted in the event of an emergency. In the event of any changes in such personnel, the gas pipeline company must immediately notify the commission and municipalities.</p> <p>(9) Each gas pipeline company must send to the commission, by e-mail, daily reports of construction and repair activities. Reports may be faxed only if the gas pipeline company does not have e-mail capability. Reports must be received no later than 10:00 a.m. each day of the scheduled work, and must include both gas pipeline company and contractor construction and repair activities. Report information must be broken down by individual crews and the scheduled work must be listed by address, as much as practical. To the extent possible the reports will only contain construction and repair activity scheduled for that day, but they may include a reasonable allowance for scheduling conflicts or disruptions.</p> <p>(10) When a gas pipeline company is required to file a copy of a DOT Drug and Alcohol Testing Management Information System (MIS) Data Collection Form with the U.S. Department of Transportation, Office of Pipeline Safety, the gas pipeline company must simultaneously submit a copy of the form to the commission.</p>

Response: EPA disagrees with the comment. Although both EPA and DOT regulations apply to natural gas metering and regulating stations, EPA is concerned with GHG emissions and DOT is focused on safety requirements and the two programs' goals and therefore data collect methods are different and therefore not applicable. For that reason EPA has chosen not to cross-reference the DOT inspection program for purposes of incorporation in subpart W. While EPA considered various policies for leak detection and measurement, EPA did not consider incorporating individual state-level regulations to the rule as they are all unique and not applicable to nationwide reporting requirements. EPA considers the leak detection approach outlined in today's final rule to be appropriate. Revisions to the April 2010 rule found in docket (EPA-HQ-OAR-2009-0923-0002) include the option of using additional leak detection methods to reduce the burden of complying with this subpart. For further details, please see "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements," found in docket EPA-HQ-OAR-2009-0923 and Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1042-27

Commenter: Dan F. Hunter

Organization: ConocoPhillips Company, Dan F. Hunter

Comment Excerpt Text:

98.234(b) Monitoring and QA/QC requirements

ConocoPhillips Comment:

Subpart W appears to set up a conflict with Subpart C. ConocoPhillips established GHG monitoring plans in 2009 and 2010 to comply with the requirements of Subpart C which allows for use of manufacturers' recommendations for meter calibrations, even if consensus based standards are available (§98.34(b)(1)(i)). However, if the entire onshore petroleum and natural gas facility is subject to Subpart W, then those same meters may not be afforded the allowance to

use manufacturer's recommendations if a consensus-based standard exists (§98.234(b)). This could set up unfair treatment of the onshore petroleum and natural gas category so we request that EPA clarify by stating that the use of manufacturer's recommendations under Subpart C for combustion equipment is acceptable for Subpart W facilities. Further, we believe that EPA should allow the use of manufacturer's recommendations for other meters required by Subpart W even when consensus-based standards exist. Otherwise, Subpart W will have potentially more stringent requirements on sources of lesser emissions.

Response: In today's final rule EPA has provided the option of using industry standard practices to operate and calibrate meters, which includes the use of manufacturer's recommendations if they are an industry standard practice. Please see Section 98.234 (b) of today's final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1060-7

Commenter:

Organization: Yates Petroleum Corporation

Comment Excerpt Text:

Lastly, producing basins cross state lines and some states have state-specific reporting requirements that do not align with the EPA's proposed reporting rule. Aggregating sources by basin causes operators to comply with competing methodologies and thresholds in order to comply with state specific and federal reporting. Yates requests the EPA work with states that have implemented state-specific GHG reporting requirements to harmonize these GHG reporting requirements.

Response: EPA disagrees with the commenter. Please see response to EPA-HQ-OAR-2009-0923-1015-7 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1080-52

Commenter: Barbara Wickman

Organization: Aka Energy Group, LLC, and Barbara Wickman

Comment Excerpt Text:

The proposed rule increases in the number of facilities subject to Subpart C for combustion GHG emissions by approximately 15 times, with no consideration for the size of each individual facility. This results from the fact that, numerically, there are typically 10-20 gathering compression facilities for every gas processing plant.

Response: EPA has decided not to include gathering lines and boosting stations as an emissions source in subpart W at this time and hence the issue raised by the commenter is no longer pertinent. Please see Section II.F of the preamble for further details on gathering and boosting systems.

Comment Number: EPA-HQ-OAR-2009-0923-1151-68

Commenter: Karin Ritter

Organization: American Petroleum Institute, Karin Ritter

Comment Excerpt Text:

Preamble p.52) EPA believes that it may be possible that onshore petroleum and natural gas production equipment from onshore petroleum and natural gas production facilities may be co-located with other manufacturing facilities already covered under other subparts of the rule (e.g., cement manufacturing facilities or glass manufacturing facilities). It is not EPA's intent to have these manufacturing facilities include emissions from onshore petroleum and natural gas production equipment in their threshold determination. EPA seeks comment on this approach. API agrees with EPA's intent to NOT include emissions from co-located manufacturing facilities with onshore petroleum and natural gas operations. The manufacturing operations may have different operators, such that the onshore petroleum and natural gas operations would not have access to the emissions data needed for reporting. This is also a departure from other CAA regulation and definition of facility. If these manufacturing facilities are included in a separate subpart of the MRR, those operations should be treated as a unique facility for threshold determination.

Response: EPA agrees with the commenter. For further details, please see response to EPA-HQ-OAR-2009-0923-1024-14.

Comment Number: EPA-HQ-OAR-2009-0923-1170-5

Commenter: Gretchen Kern

Organization: Pioneer, Gretchen Kern

Comment Excerpt Text:

Subpart W, 98.232(k), states If You must report under Subpart C of this part the emissions of CO₂, CH₄, and N₂O from each stationary fuel combustion unit by following the requirements of Subpart c." Further, 98.231(b) refers to 98.2(a)(2) which mandates combining emissions from all subparts to determine applicability to the Rule. This is extremely confusing because Subpart C has a different "facility" definition than Subpart W. Assuming that this means ALL combustion sources, with no de minimus emission threshold, in addition to all vented and fugitive GHG emissions are required to be taken into account to determine exceedance of the threshold for Subpart W, this interpretation is directly contradictory to Subpart C. Subpart C has already set the precedence for the definition of a "facility"; applying Subpart C to Subpart W is confusing and could result in double reporting. Further, it contradicts the purpose as stated in Subpart C to only include large combustion sources at facilities (under Subpart C's definition "facility") that exceed 25,000 tons/year in GHG emissions and therefore, in aggregate, are substantial. Further, by aggregating these combustion sources (engines, heaters, etc ...) into a single reporting entity for Subpart W, the combined emissions from stationary combustion, fugitive and vented sources would typically exceed the threshold for Subpart W. This then has the effect of triggering the reporting of Subpart C stationary combustion emissions for small compressor stations that were previously beneath the threshold for Subpart C reporting, under the Subpart C

"facility" definition (ie: small 50 hp engine, every tank battery heater treater, etc. ... L and would require substantially more time, cost and resources.

Response: EPA has resolved the facility definition differences between subparts W and C and has made clarifications about any conflicts for combustion emissions between these Subparts. In today's final rule, EPA has provided an equipment threshold for external combustion equipment in onshore production and natural gas distribution that will avoid unnecessary burden to report emissions from minor combustion emissions. For further details, please see Section II.F of the preamble and the response to EPA-HQ-OAR-2009-0923-1060-27.

Comment Number: EPA-HQ-OAR-2009-0923-1170-6

Commenter: Gretchen Kern

Organization: Pioneer, Gretchen Kern

Comment Excerpt Text:

In regard to Subpart W's gas processing "facility" definition, 98.230(3) states "field gathering and/or boosting stations that gather and process natural gas from multiple wellheads, arid compress and transport natural gas ... as feed to the natural gas processing plants are considered a part of the processing plant." Again, this aggregation has the effect of triggering the reporting of Subpart C stationary combustion emissions for small, remote compressor stations that were previously beneath the threshold for Subpart C reporting, under the Subpart C ((facility" definition, and would require substantially more time, cost and resources. Further and most importantly, the definition of a gas processing plant is well defined in the Clean Air Act and does not incorporate stand alone gathering system compression facilities.

Another issue is that often gathering lines, boosting stations, and the gas plants to which they feed are operated by different business entities. Are gas plant operators required to report emissions from equipment they do not operate? This will undoubtedly result in confusion and double-counting. The final Subpart W needs to clarify hypothetical, realistic situations that may occur.

Response: EPA has decided not to include gathering lines and boosting stations as an emissions source in subpart W at this time. For further details, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1201-14

Commenter: Edward S. Itta

Organization: North Slope Borough, Edward S. Itta

Comment Excerpt Text:

EPA Should Continue to Coordinate with Other Entities on Data Quality Objectives.

Several states and local jurisdictions are already planning to implement GHG reduction programs (e.g., cap and trade programs, etc.). We support "harmonization" of EPA's reporting requirements with these efforts, and encourages EPA to continue coordinating with the Western Climate Initiative (WCI) and other state and local efforts. Specifically, we recommend that EPA seriously consider the specific recommendations from WCI on the changes to EPA's proposed reporting requirements that are needed in order to generate cap and trade quality data (e.g., more

direct measurement of tank emissions and metering of pneumatic device emissions and field gas CO2 emissions).

Response: EPA has taken into consideration existing reporting programs at multiple levels in the promulgation of Part 98. As different reporting programs have different policy needs, they also have different technical requirements and therefore it is not possible nor advisable to complete harmonization. EPA is working with states to facilitate data transfer between reporting programs. Please see Section 6 of the background Technical Support Document (TSD) for the April 2010 proposed rule under rule making docket EPA-HQ-OAR-2009-0923-0027 and the response to comment EPA-HQ-OAR-2009-0923-0582-2 for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1206-1

Commenter: Jeff Applekamp

Organization: Gas Processors Association

Comment Excerpt Text:

First, the proposal would require oil and gas production, gathering, and processing operations to be aggregated in a manner that is inconsistent with current Clean Air Act (“CAA”) regulations and greatly increases the burden for reporting GHG emissions.

Response: Today’s final rule does not include gathering and boosting systems. Please see Section II.F of the preamble for further details on this issue.

Comment Number: EPA-HQ-OAR-2009-0923-1206-22

Commenter: Jeff Applekamp

Organization: Gas Processors Association

Comment Excerpt Text:

Direct measurement is not appropriate for any sources.

GPA feels that direct measurement is not appropriate for any sources for the purposes of GHG emission inventories, consistent with other emission inventory practices. Although EPA has reduced direct measurement requirements in the current proposal for Subpart W, EPA continues to employ methods that ignore longstanding and accepted international protocols for emission inventory calculations.

Response: EPA disagrees that all direct measurement is not appropriate for any sources and should be replaced by alternative methods, please see the response to EMAIL-0002-9 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923).

6.2 DUPLICATIVE REQUIREMENTS: THE CLIMATE REGISTRY (TCR)

No comments received.

6.3 DUPLICATIVE REQUIREMENTS: OTHER PROGRAMS

Comment Number: EPA-HQ-OAR-2009-0923-1020-2

Organization: Southwest Gas Corporation

Commenter: James F. Wunderlin

Comment Excerpt Text:

III. Duplication of current Federal and State Regulations

It is Southwest's opinion that EPA apparently has not considered the above referenced pipeline safety regulations under which both interstate and intrastate pipelines operate with regard to leak detection. In so doing, EPA appears to be ignoring the records of stringent leak survey and repair procedures that have been used by gas distribution operators for over 50 years, and for over 30 years as required by the federal pipeline safety regulations, all of which demonstrate that gas pipelines use pipeline components that contain their product very well.

DOT Pipeline and Hazardous Materials Safety Administration (PHMSA), based on Title 49 Code of Federal Regulations (49CFR) Part 192, already requires utilities to survey business districts annually and non-business districts once every five years, as administered by individual state public utility commissions (PUC). More specifically 49CFR§192.723 allows LDC's to use the most effective equipment, such as soap, and gas detectors, to detect the leaks in pipes and associated control equipment, such as regulator stations. As indicated above, these practices have been used for decades under the close scrutiny of the state PUCs and PHMSA. Any new inventory system implemented by USEPA would be redundant.

In addition, while some states adopt the PHMSA leak detection requirements by reference, many PUCs impose more stringent standards for leak survey frequency and/or specify a range of acceptable, alternative leak detection methods.

Response: EPA disagrees that it did not consider DOT regulations. Please see the rulemaking docket memo under today's final rule (EPA-HQ-OAR-2009-0923) "Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements."

Comment Number: EPA-HQ-OAR-2009-0923-0049-3

Organization: American Gas Association

Commenter: Pamela Lacey

Comment Excerpt Text:

There Are Ways to Achieve EPA's Goals With Far Less Burden

We think it is possible to achieve EPA's goals with far less burden. First, EPA should delete the proposal to require LDCs to report the mileage of natural gas distribution main and service lines and fugitive emissions calculated by applying emission factors to the miles of pipe. EPA already

has this data from LDC's reports to DOT and EPA's GHG Inventory which calculates methane emissions by applying applicable emission factors.

Response: EPA disagrees with the comment regarding goals of the MRR. The CAA Section 114 provides EPA with broad authority to require emissions to be reported, not just activity data as suggested. Please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) preamble Sections I.C and II.Q. EPA disagrees that eliminating the requirement for natural gas distribution facilities to report pipeline mileage and apply emission factors will result in "far less burden" for compliance with the reporting rule. LDC's are already required to report their distribution mains pipeline mileage and services counts to DOT PHMSA. There is no significant additional burden to LDC's to collect these data and submit them to EPA. In addition, the requirement to apply the appropriate emission factors to these activity data will not impose significant burden to reporters. Most importantly, data submitted under today's final rule will provide important information on one of the largest emission sources from the natural gas distribution segment and allow EPA to associate the emissions from this source to the specific reporters. Thus, today's final rule maintains the requirement for natural gas distribution reporters to report their pipeline miles and service lines and the associated emissions.

Comment Number: EPA-HQ-OAR-2009-0923-1009-1

Organization: Xcel Energy Inc.

Commenter: Eldon Lindt

Comment Excerpt Text:

Duplicative Requirements

The proposed rule will implement duplicative requirements since annual reporting to the Department of Transportation (DOT) requires reporting of the miles of distribution mains and services lines. This information already allows EPA to use emission factors to calculate methane emissions for annual GHG reporting. Likewise, federal and state agencies currently require local distribution companies (LDCs) to perform regular leak surveys.

Response: In regards pipeline mileage reporting, please see response to EPA-HQ-OAR-2009-0923-0049-3. EPA disagrees that subpart W is duplicative to other agency requirements. Please see "Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements" in EPA-HQ-OAR-2009-0923.

Comment Number: EPA-HQ-OAR-2009-0923-1016-20

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment Excerpt Text:

Align Leak Survey Requirements with Existing Federal and State Leak Detection Survey Requirements

Federal and State Leak Survey Regulations: Natural gas distribution operators are currently required to adhere to both federal and state leak reporting requirements. Performance based

regulations drafted by the Department of Transportation (DOT) do not prescribe the level of detail in the proposed Subpart W, but operators are already completing leak surveys and reporting leaks identified in a manner that addresses the intent of the proposed rule. PHMSA works in concert with the state regulators to ensure leaks are identified and reported on a regular and, when needed, expeditious manner. PHMSA posts summary leak information that is collected by all the states for any member of the public to review.⁶⁹

AGA encourages EPA to review the state regulatory information that is publicly available to ensure the final reporting rule does not duplicate, and where possible aligns with, regulatory requirements already in place. For example, if EPA finds that further granularity is needed to perform leak surveys on components at M&R and city gate stations for use in applying leaker emission factors to those components, then it would help to reduce costs and burdens if this component survey could be performed at the same time as the leak surveys performed to comply with existing state and federal leak survey requirements. Under 49 C.F.R. §192.723, DOT PHMSA requires LDCs to conduct periodic leak surveys. Section 192.723(b) provides that

“The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:

(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.

(2) A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years... However, for cathodically unprotected distribution lines subject to §192.465(e) on which electrical surveys for corrosion are impractical, a leakage survey must be conducted at least once every 3 calendar years...”

Annual DOT Report: Leak survey results must be reported to DOT PHMSA annually on Form PHMSA F 7100.1-1 (12-05) (Form Approved OMB No. 2137-0522. A copy of the form is available at the DOT PHMSA web link provided above.

ANSI-Accredited Industry Standards for Leak Surveys – GPTC Guide:

A consensus industry standards organization has developed detailed guidance that LDCs follow to ensure compliance with the federal DOT PHMSA leak survey requirements. This industry standard guidance is available for purchase through AGA’s web site. AGA serves as the secretariat to the Accredited Standards Committee (ASC) Z380, Gas Piping Technology

⁶⁹ See <http://primis.phmsa.dot.gov/comm/states.htm?nocache=2058>. Also see PHMSA Annual Reporting Form: http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/GasDistrAnnualForm_122005_Final_7100_1-1.pdf

PHMSA Distribution Incident Reporting Form:
[http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Gas__Distr%20Incident%20Form%20-%20PHMSA%20F%207100-1%20\(01-2010\).pdf](http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Gas__Distr%20Incident%20Form%20-%20PHMSA%20F%207100-1%20(01-2010).pdf)

Committee (GPTC). The GPTC develops and publishes ANSI Z380.1, Guide for Gas Transmission and Distribution Piping Systems.⁷⁰ The committee meets three times per year and has a list of approximately 75 open “transactions” (projects) to revise various provisions in the Guide. The committee publishes three addenda to the Guide every year which contain updates. The Guide is published as a new edition every three years. Copies of the cover page, table of contents and sample pages regarding leak surveys are attached.

Five Year Rolling Average for Facilities in Non-Business Districts: To comply with 192.723(b)(2), LDCs conduct leak surveys each year of 20 percent of the non-business district pipe and equipment, including components at M&R stations and city gates. If EPA decides to impose a more specific leak survey requirement under proposed 40 C.F.R. §98.233(q) for the eight components identified in proposed 40 C.F.R. §98.232(i)(1), AGA asks that the agency align the survey frequency of components in non-business districts with the current practice of leak surveying 20% of the pipe and M&R and city gates components in non-business districts each year, using a 5-year rolling average for purposes of the leaker emission factor calculation. This should be an option at least for LDCs operating in a state that does not require more frequent surveys than the federal rule requires for non-business districts.

More Stringent State Leak Survey Requirements: It should be noted that every state reserves the right to require leak monitoring and reporting requirements beyond what is specified by DOT. For example, effective February 4, 2009, the Railroad Commission of Texas required all natural gas distribution pipeline operators to submit leak reports every six months.⁷¹ Texas Administrative Code §8.210(e) requires all natural gas distribution pipeline operators to report leaks in accordance with the following specifications:

(e) Leak Reporting. For purposes of this subsection, the term "leak" includes all underground leaks, all hazardous above ground leaks, and all non-hazardous above ground leaks that cannot be eliminated by lubrication, adjustment, or tightening. Each operator of a gas distribution system, of a regulated plastic gas gathering line, or of a plastic gas transmission line shall submit to the Division a list of all leaks repaired on its pipeline facilities. Each such operator shall list all leaks identified on all pipeline facilities. Each such operator shall also include the number of unrepaired leaks remaining on the operator's systems by leak grade. Each such operator shall submit leak reports using the Commission's online reporting system, Form PS-95, by July 15 and January 15 of each calendar year, in accordance with the PS-95 Semi-Annual Leak Report Electronic Filing Requirements, set out in the Figure in this subsection. The report submitted on July 15 shall include information from the previous January 1 through the previous June 30. The report submitted on January 15 shall include information from the previous July 1 through the previous December 31. The report includes:

(1) Leak location;

⁷⁰ Information is available online at: <http://www.aga.org/Committees/gotocommitteepages/gaspiping/>.

⁷¹ See Texas Administrative Code are available on the web: [http://info.sos.state.tx.us/pls/pub/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=16&pt=1&ch=8&rl=210](http://info.sos.state.tx.us/pls/pub/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=16&pt=1&ch=8&rl=210).

- (2) Facility type;
- (3) Leak classification;
- (4) Pipe size;
- (5) Pipe type;
- (6) Leak cause; and
- (7) Leak repair method.

Additional examples of state leak survey regulations are provided in Exhibit A, referenced earlier in these comments.

D. At a Minimum, Allow Leak Surveys to Be Conducted on a Five Year Rolling Average Basis

Although some LDCs are required by their states to conduct annual leak surveys of distribution system facilities (including M&R and city gates), many follow the federal PHMSA requirement to perform leak surveys once every five years on facilities outside business districts and once per year within business districts. In states that follow this PHMSA rule under 40 C.F.R. §192.723(b)(2) requiring leak surveys outside business districts once every five years, LDCs typically comply by performing leak surveys on 20% of remote, non-business district facilities each year, so that by the end of each 5 year period, the LDC has leak surveyed 100% of the non-business district facilities. If EPA could follow this same pattern for leak surveys under Subpart W, this would significantly reduce the incremental cost of reporting leaking components at city gates and M&R stations under Subpart W by eliminating duplicative costs for traveling to these wide-spread facilities.

Response: EPA cannot tailor the rule to meet state regulations as each state has unique regulations and therefore harmonizing is not possible nor does EPA have authority to change state regulations in order to create the consistency necessary to develop a standardized national data collection regulation such as this one. Please see response to comment EPA-HQ-OAR-2009-0923-1016-9. While today's final rule does allow reporters to use the distribution pipeline mains mileage and service pipelines data that is collected for DOT, EPA disagrees that subpart W requirements should be aligned with DOT PHMSA reporting regulations. In particular the PHMSA leak detection requirements are aimed at safety concerns and not annual GHG emissions inventory as required under today's final rule. Please see "Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements" in EPA-HQ-OAR-2009-0923.

EPA disagrees with less than annual reporting. Please see The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) preamble Section II.H. EPA disagrees with the comments on cost. Please see response to comment EPA-HQ-OAR-2009-0923-0049-7. Today's final rule clarifies that leak detection is only required at above ground metering and regulator city gate stations at which custody transfer occurs. For more information, please see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1020-1

Organization: Southwest Gas Corporation

Commenter: James F. Wunderlin

Comment Excerpt Text:

Duplication of existing information

Southwest already provides an annual report to the Department of Transportation which lists the miles of transmission pipe, distribution pipe and customer services. This same information is then used in USEPA's annual INVENTORY OF U.S. GREENHOUSE GAS EMISSIONS AND SINKS. The DOT report also lists the number of leaks, as well as the causes of the leaks, which occurred within the system operated by the reporting company.

Response: EPA disagrees that the monitoring required by the Department of Transportation is adequate for the purposes of creating an annual inventory of greenhouse gas emissions as required under subpart W. Please see "Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements" in EPA-HQ-OAR-2009-0923.

Comment Number: EPA-HQ-OAR-2009-0923-1024-28

Organization: Kinder Morgan Energy Partners, L.P.

Commenter: Kim Dang

Comment Excerpt Text:

Component Surveys for Fugitive Emissions. Some facilities in the petroleum and natural gas sector, especially natural gas processing facilities, are already required to carry out stringent leak detection and repair (LDAR) programs in order to comply with the best available control technology (BACT) requirements of their Prevention of Significant Deterioration (PSD) permits, or to comply with applicable NSPS⁷² or NESHAPS.⁷³ These LDAR programs have resulted in well-established component counts that are sufficiently rigorous to have met with EPA's approval, as well as the approval of state regulators, in the case of BACT requirements in states that administer their own PSD programs. For facilities that are already subject to these LDAR requirements, the fugitive monitoring provisions of the proposed Subpart W⁷⁴ would impose duplicative requirements to conduct leak detection surveys and component counts.⁷⁵

Facilities should be allowed to use existing LDAR survey results produced for compliance with CAA regulations to serve as the basis for application of emission factors under the proposed

⁷² See 40 C.F.R. SECTION 60.630-636 (NSPS for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants).

⁷³ See 40 C.F.R. SECTION 63.760 (NESHAPS for Oil and Natural Gas Production Facilities).

⁷⁴ Proposed 40 C.F.R. SECTION 98.233(q) and (r).

⁷⁵ As EPA notes in the Technical Support Document (TSD) accompanying the proposed Subpart W, LDAR requirements in NSPS and NESHAP regulations are directed at detection and control of volatile organic compounds (VOCs). Greenhouse Gas Emissions Reporting From the Petroleum and Natural Gas Industry, Background TSD, at 10-11. However, the VOC sources targeted by these programs are the same components that would be targeted as methane and CO₂ sources under the proposed Subpart W. Therefore, it is appropriate to use VOC component counts as the basis for component counts for fugitive emissions under the proposed Subpart W.

Subpart W, at least for those portions of the facility that are covered by existing LDAR programs. This approach would be a cost-effective way to take advantage of data that has already been collected at certain facilities.

Response: EPA disagrees with the commenter and has determined that comprehensive leak detection on all relevant greenhouse gas streams in the processing facility is required to meet the objectives of today's final rule. While EPA knows that certain processing facilities are currently conducting LDAR programs, it is important to note that these LDAR requirements exclude emission streams that have less than 10 percent Volatile Organic Compounds (VOC). Thus, the natural gas stream downstream of the de-methanizer, which is usually over 90 percent methane, does not get monitored under existing LDAR requirements. As a result, a significant methane emissions source would not get reported if EPA simply allowed the application of existing LDAR requirements. EPA, however, is aware of the interrelationship between today's final rule and LDAR requirements and is allowing the use a variety of leak detection equipment, in order to reduce burden Please see Section II.F of the preamble to today's final rule for further details. Furthermore, in today's final rule, EPA requires the reporting of leaking component count only. Please see Section 98.236 of today's final rule for further details.

Comment Number: EPA-HQ-OAR-2009-0923-1026-9

Organization: Dominion Resources Services, Inc.

Commenter: Pamela Faggert

Comment Excerpt Text:

The proposed rule would require LDCs to conduct annual leak detection at all above grade Measuring and Regulating (M&R) stations using optical imaging and to apply emission factors to the leaking sources. It is doubtful that there would be enough equipment in the marketplace or trained operators to conduct these annual surveys at all M&R stations that would be affected. Furthermore, infrared cameras are not the best choice for locating leaks in distribution systems and are far more expensive than other more reliable leak detection systems. Finally, federal and state agencies already require LDC's to perform regular leak surveys. EPA's re-proposal would duplicate and potentially conflict with those federal and state leak detection requirements. Therefore, Dominion requests that the requirement for annual leak surveys be removed in the final rule. To the extent EPA does not do this, we request this requirement be phased in over a period of five years, using representative stations to develop emission factors for the intervening years

Response: Today's final rule clarifies that annual leak detection surveys are required only at above ground metering and regulator city gate stations at which custody transfer occurs. Please see the preamble Section II.F. Additionally, EPA has revised today's final rule to allow specific alternatives to optical gas imaging instruments for leak detection. Please see the preamble Section II.F.

EPA disagrees that the rule is duplicative of other agency requirements. Please see "Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements" in EPA-HQ-OAR-2009-0923.

Concerning the availability of equipment or trained operators, for certain sources EPA will allow the application for the use of best available monitoring methods. Please see the preamble Section II.F. EPA disagrees that it should phase leak detection requirements in over a five year period. However, EPA has revised today's final rule to allow representative monitoring by requiring leak detection at above ground custody transfer stations only.

Comment Number: EPA-HQ-OAR-2009-0923-1059-12

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

The GHG emissions that the EPA is requiring to be estimated under the Subpart W Rule may be determined from data already submitted annually to the Department of Transportation (DOT). DOT requires leak surveys conducted through regulations under the Pipeline and Hazardous Materials Safety Administration (PHMSA) for public safety reasons. Each natural gas local distribution company (LDC) conducts leak surveys on their system, including meter and regulator stations, annually for business districts and once every four or five years outside business districts. Leaks in the natural gas system are identified, classified by potential hazard to people and property, monitored and scheduled for repair according to the specific leak hazard classification. The annual number and classification of leaks in the natural gas distribution system are reported to the DOT annually, along with an estimation of lost and unaccounted for (LUAF) gas. LUAF gas is determined by subtracting the city gate receipts of natural gas from the total quantity of gas billed to customers. The LUAF gas quantity is attributable to numerous factors, including the inherent inaccuracies of gas measurement, industry-wide practice of monthly meter reading intervals and leakage from the natural gas distribution system.

The LUAF gas quantity may be an alternative source of determining GHG emissions from natural gas distribution systems in the interim, however, individual LDC emissions factors would probably have to be developed and applied to the LUAF gas quantity to only include the quantity expected from fugitive emissions or leaks, and not include the quantity of the LUAF gas value that is due to meter inaccuracy and temperature variations experienced within the system. MOU has not explored developing a company specific emissions factor for LUAF gas, and developing this factor may ultimately be too onerous.

Response EPA disagrees on the use of LUAF as a surrogate for greenhouse gas emissions data collection. As the commenter discusses, there are other multiple factors associated with LUAF, such as inaccuracies of gas measurement, and thus would not provide the desired level of data accuracy and quality to achieve the objectives of today's final rule. Most importantly, because LUAF would not identify the exact sources of the emissions, there would be further inadequacies for informing future policy. Finally, no current studies exist that accurately define the percentage of LUAF that is emissions from a system.

Comment Number: EPA-HQ-OAR-2009-0923-1059-14

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment Excerpt Text:

In addition, liquefied natural gas (LNG) facilities are designed and regulated under Part 193 – LNG Facilities: Federal Safety Standards of the DOT Code. LNG Plants are mandated to have methane gas detectors located throughout the facility to detect a gas leak which would immediately go into alarm. Plant Operators respond immediately to the gas alarms and make repairs as soon as possible. LNG Plants are vastly different than pipelines from an operations perspective already having leak detection equipment installed. Therefore, MDU believes LNG facilities should be excluded from the Subpart W Rule on a similar basis as natural gas transmission systems.

Response: EPA disagrees with the commenter. Gas detectors (typically low explosive limit (LEL) detectors) monitor the concentration of hazardous (or methane) gases in the ambient air. EPA has determined through its experience in field studies that gas detectors that measure concentration for safety purposes are not a good indicator of the magnitude of equipment leak emissions. This is because there are instances where there are significant equipment leak emissions, but due to the location of the emissions source and ambient conditions (such as good air circulation) emissions are easily dispersed and do not register on the gas detector that measure concentration. Finally, the commenter has not provided any specific information on any study where leak detection was conducted and was found to be negligible from LNG facilities. Hence, EPA is requiring reporting of emissions from LNG facilities in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1152-6

Organization: Consumer Energy Company

Commenter: Amy Kapuga

Comment Excerpt Text:

Miles of Gas Main and Service Lines Reported to DOE

EPA could omit the requirement to report fugitive emissions from distribution pipe, because this information is already available to EPA in EPA’s annual GHG Inventory. Each year, LDCs report their miles of different types of natural gas mains (cast iron, steel, plastic pipe) and service lines to the Department of Energy (DOE) Energy Information Administration (EIA), and EPA then calculates the fugitive methane emissions by multiplying the miles of pipe times the appropriate emission factor. There is no need to duplicate this effort.

Response: EPA disagrees that it should eliminate the requirement to report distribution pipeline miles and emissions from natural gas distribution facilities. Please see the response to EPA-HQ-OAR-2009-0923-0049-3.

Comment Number: EPA-HQ-OAR-2009-0923-1156-2

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Conflict/overlap of EPA jurisdiction with Pipeline and Hazardous Materials Safety Administration (PHMSA) Pipeline Safety Regulations under the Department of Transportation (DOT):

PHMSA/DOT pipeline safety regulations in 49 CFR 192 applicable to LDCs require routine natural gas leak detection inspections and that natural gas for distribution be odorized. These regulations produce a stringent and effective method of locating and eliminating fugitive emissions. It is not only unnecessary but also extremely inefficient and costly for EPA to essentially duplicate those regulations by means of EPA's proposed Leak Detection and Repair (LDAR) requirements and other measures contemplated in subpart W. In other industries, an LDAR program may be a necessary requirement to ensure that leakage from process equipment is minimized and addressed, but this is certainly not the case for LDC operations.

By the measures proposed in subpart W, EPA is infringing on PHMSA/DOT regulatory jurisdiction and adding unneeded costs to LDCs. Some of the measures are a direct duplication of effort, such as reporting of miles of each type of pipe and number of service lines.

Please refer to 49 CFR 192.723 as one of many examples demonstrating how fugitive emissions from LDC gas distribution systems are already being rigorously addressed. These regulations require gas leak inspections at specified time intervals. Sensitive methane detection instruments, such as the flame ionization detector (FID) and combustible gas indicator (CGI), are utilized by gas utility personnel every day to regularly patrol for and detect gas leaks, even leaks too small to be detected by the human sense of smell. Leaks so identified are scheduled for appropriate and timely repair.

Laclede incorporates by reference at the following web link, a complete copy of Missouri's pipeline safety regulations, which are found at Missouri 4 CSR 240-40.030, Safety Standards – Transportation of Gas by Pipeline, which are modeled after, but are in numerous respects more stringent than, the corresponding Federal pipeline safety regulations. Please see:

<http://sos.mo.gov/adrules/csr/current/4csr/4c240-40.pdf>

Response: EPA disagrees that the rule is duplicative of DOT regulations. Please see “Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements” in EPA-HQ-OAR-2009-0923.

EPA also disagrees that EPA is infringing on PHMSA/DOT regulatory jurisdiction as EPA has authority to collect economy-wide greenhouse gas emissions data. Please see Section I.C of the preamble for details on EPA's authority to develop and implement today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1156-3

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

In addition, Laclede has provided a summary matrix of the Federal and Missouri's pipeline safety regulations most directly applicable to gas leak detection and repair, and consequently, the most duplicative and/or in conflict with the proposed requirements of subpart W. Please see attached, Appendix A – Laclede Gas Company Leak Related Gas Safety Inspection/Maintenance Programs. From these exhibits, and the citations given above, it should be obvious to the EPA that extraordinary measures are already undertaken and great expense incurred to minimize gas leakage. Compliance with these requirements is paid for by utility ratepayers. The additional regulatory burden of increased inspections, measurement, accounting and reporting contemplated in subpart W will add considerable expense to utility operations, with no demonstrable benefit to ratepayers or the environment. Also, the data generated will not be of any greater accuracy than that presently available to EPA through other means.

Response: EPA disagrees that subpart W will place unreasonable burden on natural gas distribution facilities, for more information, please see the Economic Impact Analysis (EIA) in the rule making docket (EPA-HQ-OAR-2009-0923). For the benefits to society, please see Section III.E of the preamble. EPA disagrees that the rule is duplicative of DOT regulations. Please see “Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements” in EPA-HQ-OAR-2009-0923. EPA did not consider incorporating individual state-level regulations to the rule as they are all unique and not applicable to nation-wide reporting requirements. Please see the Economic Impact Analysis Section 2, and The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98) preamble Section II.O.

Comment Number: EPA-HQ-OAR-2009-0923-1156-4

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment Excerpt Text:

Precedent for DOT taking jurisdiction ahead of EPA regulations:

Laclede wishes to cite the well established record of DOT regulations taking precedence over EPA regulations. For instance, please refer to the EPA Spill Prevention Control and Countermeasure (SPCC) and the Risk Management Plan (RMP) regulations.

At 40 CFR 112, Appendix A (DOT/EPA Memorandum of Understanding), it is acknowledged that pipeline facilities regulated by DOT are not subject to SPCC regulations.

Furthermore, at 40 CFR 68.3, in the definition of a stationary source, facilities subject to the DOT are exempted per the following excerpt:

“The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the

provisions of this part. A stationary source includes transportation containers used for storage not incident to transportation and transportation containers connected to equipment at a stationary source for loading or unloading. Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 CFR parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to DOT under 49 USC section 60105.”

From these examples, Laclede submits that EPA regulation of LDC fugitive emissions is redundant because these matters are under the jurisdiction of DOT.

Response: EPA disagrees with the comment. Please see Section I.C of the preamble for details on EPA’s authority to develop and implement today’s final rule. Further, Department of Transportation (DOT) regulations do not preempt EPA’s authority to collect information under section 114 of the Clean Air Act (CAA) nor is the Agency regulating GHG emissions in the MRR or in this revision.

As discussed in detail in Sections I.C and II.Q of the preamble to the 2009 final rule (74 FR 56260, October 30, 2009), EPA is promulgating 40 CFR Part 98, Subpart W under CAA Section 114, which vests the EPA with broad authority to carry out any provision of the CAA, including requiring emissions sources, persons subject to the CAA, manufacturers of process or control equipment, or persons whom the Administrator thinks may have information, to monitor emissions and report such information to the Administrator. EPA may gather such information for a variety of purposes. For example, CAA Section 103 authorizes EPA to establish a national research and development program for the prevention and control of air pollution, including GHG emissions. See *Massachusetts v. EPA*, 549 U.S. 497, 528-29 (2007) (holding that GHGs fit within the definition of air pollutant in the CAA). As discussed in the proposal (75 FR 18608, April 12, 2010), among other things, data collected from petroleum and natural gas systems will provide useful information to assist EPA in determining (1) the need for possible emissions reduction regulations in the oil and gas industry and (2) implementation of CAA Section 103(g) regarding improvements in sector based nonregulatory strategies and technologies for preventing or reducing air pollutants.

Furthermore, DOT regulations do not preempt EPA’s authority to collect information under CAA Section 114. Indeed, EPA already collects emissions information from offshore petroleum and natural gas platforms in the Gulf of Mexico. See CAA § 328(b). And, Subpart W does not “regulate” GHG emissions, but only gathers information on the emissions. More to the point, EPA’s purpose in requiring monitoring and reporting of equipment leak GHG emissions from natural gas local distribution companies (LDCs) differs from their regulation by DOT and is not redundant. The regulations of DOT’s Pipeline and Hazardous Materials Safety Administration (PHMSA) focus on safety. See 49 CFR Part 192 (transportation of natural gas and other gas by pipeline: minimum federal safety standards); *id.* § 192.1 (“This part prescribes minimum **safety** requirements for pipeline facilities and the transportation of gas”) (emphasis

added). In stark contrast, the Subpart W regulations simply finalize implementation, for petroleum and natural gas systems, a monitoring and reporting program for GHG emissions. Please see "Understanding the Substance of the DOT Regulation and Comparing Them to the Subpart W Requirements" in EPA-HQ-OAR-2009-0923.

Comment Number: EPA-HQ-OAR-2009-0923-1168-6

Organization: Delmarva Power a PHI Company

Commenter: Wesley L. McNealy

Comment Excerpt Text:

Under Subpart W, EPA is proposing to require LDCs to conduct annual leak surveys despite the fact that LDCs are already required to conduct routine leak detection surveys for both the US DOT and appropriate state public utility commission. Such duplication and/or increased frequency of additional leak surveys unnecessarily places additional strain on LDC manpower availability and labor expenses.

Response: EPA disagrees that subpart W places unreasonable burden on reporters due to duplicative reporting requirements with DOT. Subpart W does not duplicate DOT regulatory efforts, please see the response to EPA-HQ-OAR-2009-0923-1156-23. Regarding cost issues and the reporting burden, please see the discussion in Section III.B.2 of the preamble to today's final rule. For clarification on reporting requirements that explain some of the lesser burden estimated by EPA, see Section II.F of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1197-10

Organization: NiSource, Inc.

Commenter: Kelly Carmichael

Comment Excerpt Text:

EPA does not need to collect most or all of the information required in this proposed rule. The information is already available and accessible to EPA.

i Distribution Mains and Service Lines - The proposed rule requires natural gas local distribution companies (LDCs) to report fugitive and vented GHG emissions. LDCs already report their miles of natural gas distribution mains and service lines annually to the Department of Transportation. EPA calculates GHG emissions for purposes of its annual GHG Inventory by multiplying the pipe mileage reported to DOT by the emission factors. There is no need to require LDCs to file a duplicative report.

II. Leak Surveys Duplicate current federal requirements - Federal agencies already require LDCs to perform regular leak surveys. EPA's proposal would duplicate and potentially conflict these federal leak detection requirements.

Response: With regard to distribution pipelines, EPA disagrees that there is any additional burden to natural gas distribution facilities, please see the response to EPA-HQ-OAR-2009-0923-0049-3.

With regard to DOT required leak surveys, EPA disagrees that they are tailored appropriately to inform future greenhouse gas policy, please see the response to EPA-HQ-OAR-2009-0923-1156-23.

Comment Number: EPA-HQ-OAR-2009-0923-1299-6

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment Excerpt Text:

Potential Double-Counting of Emissions

Reported fugitives from Subpart W should be deducted from Subpart NN reporting requirements. We are very concerned that otherwise there would likely be a “double count” of emissions on the distribution system, resulting from an overlap of transmission company emissions within the LDC system data.

Response: EPA disagrees with the commenter. There is no overlap or double counting of emissions reporting between Subparts W and NN. Subpart W requires the reporting of equipment leaks and vented emissions from LDCs prior to the end use supply of natural gas. Subpart NN requires the reporting of end use supply of natural gas.

6.4 INVENTORY OF U.S. GHG EMISSIONS AND SINKS

Comment Number: EPA-HQ-OAR-2009-0923-1097-5

Organization: San Juan Citizens Alliance

Commenter: Josh Joswick

Comment Excerpt Text:

Conclusions and Next Steps

With the inclusion of local data provided by the natural gas industry, the accuracy of the inventory estimates has improved for the categories addressed. We recognize a degree of uncertainty still surrounds these corrected values and an estimated uncertainty of + 15% is still reasonable. The highest individual sector uncertainty resides in the “vented Methane” sector which industry did not address. New Environmental Protection Agency (EPA) regulations are currently proposed for GHG emissions and industry will be required in 2011 to report GHG emissions for calendar year 2010. The drafted EPA - GHG Reporting regulation will allow for much more accuracy in reporting GHG emissions from larger emissions sources. It may also include an approved method for quantifying fugitive emissions allowing for greater accuracy in overall nation-wide emissions inventories. The WRAP may also release fugitive reporting guidelines later this year. The venting of methane will decline with the evolution of “green”

completions and the use of “low-bleed” pneumatic devices. Accordingly, the inventory methodology for this sector is expected to evolve. Industry will be engaged and even consumed in a detailed inventory of GHG emissions beginning in 2010 and sees no need to revise or update the County inventory in subsequent years. The EPA - GHG report should serve as the Industry emissions inventory from this point forward. Updates to the other source categories (Segment C) should be undertaken in the next few years as better information on state and federal regulations, activity and growth data, and emission estimation methods become available – including data from the 2010 census.

Response: EPA reviewed the “La Plata County Draft Emissions Inventory Revisions Report” submitted by the commenter. In response to the conclusions noted in the comment above, EPA agrees that the results of Mandatory Reporting Rule may lead to improvements in the “U.S. Inventory of Greenhouse Gas Emissions and Sinks.” Subpart W has coverage of approximately 80% of emissions covered under the rule. The remaining 20% of emissions from those sources, and the remaining sources that are not covered under subpart W will still be need to be estimated in order to have a complete inventory of emissions from the petroleum and natural gas industry for the entire U.S. EPA will integrate the data it receives from reporting under subpart W into the U.S. Inventory in order to reduce uncertainty and also to more appropriately extrapolate emissions to the remainder of facilities that did not trigger reporting under subpart W.

6.5 HOW WILL THIS RULE AFFECT EPA’S VOLUNTARY GHG REPORTING PROGRAMS

No comments received.

FOREWORD FOR VOLUME 7

EPA received a large number of unique comments in this Volume. A number of comments relate directly to the proposed rule and each of these is identified and responses are presented. EPA also received an extraordinary high number of comments (over 51,000) from individuals expressing support for the rule, many of which were part of three mass-mailing campaigns and are listed below. There were two mass-mailing campaigns from unknown organizations.

VOLUME 7: THE RULE DEVELOPMENT PROCESS, STATUTORY AND EXECUTIVE ORDER REVIEWS, AND OTHER MISCELLANEOUS COMMENTS

7.0 THE RULE DEVELOPMENT PROCESS, STATUTORY AND EXECUTIVE ORDER REVIEWS, AND OTHER MISCELLANEOUS COMMENTS

No Comments Received.

7.1 GENERAL RULE DEVELOPMENT PROCESS

Comment Number: EPA-HQ-OAR-2009-0923-0050-2

Organization: Southwest Gas Corporation

Commenter: Jim Wunderlin

Comment: Exceptionally Short Comment Period

Southwest has serious concerns over how this proposed rule meets minimum federal administrative procedures. Southwest notes that the official Federal Register notice was only issued on April 12, 2010.⁷⁶ The one and only workshop to discuss this rule was held a scant seven days later on April 19, 2010 in Arlington, Virginia.

During a Technical Pipeline Safety Standards Committee (TPSSC) meeting held December 10, 2009, information on “Climate Change” was presented by representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Environmental Protection Agency (EPA) to the combined advisory committees. Following that meeting, Southwest expressed its concerns about the nature of the presentation, especially in regards to any possible assumption that the presentation somehow implied TPSSC acquiescence to EPA’s focus and direction.

Response: The time provided for comments is consistent with the time provided for all other subparts in the Mandatory Reporting Rule process in both 2009 and 2010 and meet all applicable Federal laws, Executive Orders and guidelines regarding public comment. Please see the

⁷⁶ Federal Register/Vol. 75, No. 69/Monday, April 12, 2010, pg. 18608.

response to comment EPA-HQ-OAR-2008-0508-0433.1, excerpt 1 in the responses to 2009's Mandatory Reporting Rule for a description of EPA's rationale for the comment period for the Mandatory Reporting Rule.

EPA recognizes that there is no implied TPSSC acquiescence to EPA's rule.

Comment Number: EPA-HQ-OAR-2009-0923-1016-41

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment: Technical Support Document Corrections

AGA would like to offer information that should help EPA provide a more accurate description of LNG facilities in the TSD. The current TSD contains several errors in LNG facility process descriptions, equipment levels, as well as listing the number of LNG facilities in the US well above the actual number and type of facilities. Based on DOE EIA data, there are 121 LNG facilities nationwide, and the majority of these LNG facilities are located in the Northeastern U.S. Eleven of the 121 LNG facilities are large LNG import terminals, 8 onshore and 3 offshore. Of the remaining 110 LNG facilities, approximately 50% are peak shaving facilities with liquefaction, and 50% are storage and vaporization facilities of varying sizes, including the smaller satellite LNG facilities. In addition, contrary to the description in the TSD, only a few of the 11 terminals re-liquefy their boil-off and no LNG storage facilities re-liquefy boil-off. In contrast, the TSD erroneously states that 50% of LNG facilities re-liquefy boil-off. In addition, LNG facilities -- both storage and import facilities -- use their LNG pumps to generate sufficient pressure to vaporize natural gas into the transmission or gas distribution systems and do not use compressors to pressurize and move the vaporized gas into the system as described in the TSD. See attached Exhibit C, Figures 1A, 2 and 3 .

Response: EPA obtained the LNG storage facility data from a Gas Technology Institute (GTI) Publication, *The World Energy Source Book – Fourth Edition, An Encyclopedia of the World LNG Industry*, GTI 07/0002. This study provides a listing and characteristics of most of the individual LNG facilities across the country. EPA did not undertake a comparative analysis on the TSD on why the numbers are different from the DOE estimates cited by the commenter for two reasons: 1) EPA has determined that since only 33 of the large LNG storage facilities will have to report to today's final rule, the count of total facilities in the country is not critical in determining either burden or coverage of emissions; 2) The GTI publication is reputable and provides activity information needed to allocate emissions and cost. Regarding LNG import terminals, EPA obtained the data on 4 onshore and 1 offshore import terminals from FERC. EPA did not take into account any import terminals that are not currently operating. In the case of boil-off and LNG pumps, while this is the best data available, EPA does not contest the commenter claims either because the information that EPA has is based on assumptions and is over a decade old. In fact, EPA one of the primary reasons for gathering data from LNG facilities is to provide reasonable quality and up-to-date data and information that the EPA does not currently have for effective policy making.

Comment Number: EPA-HQ-OAR-2009-0923-1059-24

Organization: Montana-Dakota Utilities Co.

Commenter: Abbie Krebsbach

Comment: We recommend that EPA continue to work with the natural gas industry to develop more accurate, but economical methods to quantify fugitive GHG emissions from distribution systems and operations before finalizing a GHG reporting rule that involves these sources.

Response: EPA concluded that the methodologies in the rule will provide credible information to inform national policy. As new data becomes available and EPA determines that resulting information can improve the quality of the Rule, EPA will consider rule methodology modifications as appropriate. EPA has also modified today's final rule to allow use of alternative leak detection equipment other than IR cameras to reduce potential burden (see Section II.E of the preamble)

7.1.1 RULE DEVELOPMENT

Comment Number: EPA-HQ-OAR-2009-0923-0061-1

Organization:

Commenter: A. Potts

Comment: I can only assume that the intent of the EPA is to ultimately phase in businesses with levels lower than 25,000 metric tons of CO2 output per year and regulate these businesses over time. If this is the case then I applaud the EPA for their effort and see the EPA as working within its defined purpose.

Response: As discussed in Section III.B.1 of the preamble (Table W-7), EPA estimates that today's final rule will capture about 85% of greenhouse gas emissions from the petroleum and natural gas industry at a 25,000 metric tonnes/year threshold. EPA has determined that this is adequate for the purpose of the mandatory reporting rule at this time. As one of the purposes of The Final Mandatory GHG Reporting Rule ("Final MRR"), (40 CFR part 98) is to inform future policy, EPA has the option of adjusting thresholds in future rulemakings as necessary or appropriate.

7.1.2 PUBLIC PARTICIPATION

No Comments Received.

7.1.3 REQUESTS FOR EXTENSION OF COMMENT PERIOD

Comment Number: EPA-HQ-OAR-2009-0923-1196-8

Organization: Independent Petroleum Association of New Mexico

Commenter: Karin V. Foster

Comment: EPA seeks comment on the proposal not to allow use of best available monitoring methods for part or all of the first year of data collection. IPANM is concerned by the extraordinarily short timeline this rule offers in order to come into compliance. If the rule becomes finalized as early as September, that leaves only the last quarter of 2010 to implement monitoring and direct measurement strategies (where necessary), with no “Best Available Monitoring Method” allowed. Furthermore, there are direct calibration requirements required PRIOR to the reporting year – it will be nearly impossible to find enough staff or qualified contractors to perform those calibrations prior to January 1, 2011.

The rule will require direct monitoring and measurement requirements for sites with miniscule emissions. As required in 98.234(b) – Monitoring and QA/QC requirements, “All flow meters, composition analyzers, and pressure gauges that are used to provide data for the GHG emissions calculations shall use measurement methods, maintenance practices, and calibration methods, prior to the first reporting year and in each subsequent reporting year ...” Calibrating all meters, composition analyzers and pressure gauges prior to the reporting year will be nearly impossible given the number of components to be calibrated. Acid gas removal stacks will require the installation of not one, but two meters that must meet these requirements. Three months is simply not enough time to implement the requirements outlined in the rule as written.

Response: EPA will allow the use of best available monitoring methods for specified emissions sources for certain industry segments. Please see Section II.F of the preamble for details on the process and rationale. EPA considered each source and the reporting compliance requirements and determined for which monitoring requirements it is appropriate to allow the use of best available monitoring methods, for how long the use of best available monitoring methods will be applicable, and under what circumstances these methods are reasonable.

In addition, the requirement to complete calibration prior to January 1, 2011 has been removed from today’s final rule.

In regards to acid gas removal meters, EPA has modified today’s final rule to reduce burden by requiring only one meter. See Section III.B.2 of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1196-10

Organization: Independent Petroleum Association of New Mexico

Commenter: Karin V. Foster

Comment: IPANM recommends a complete review of the proposed rule as the very onerous implementation time frame of the rule will cause unnecessary burdens on industry, particularly in high energy development, low per capita consultant states like New Mexico. We believe that our smallest producers, especially those who operate marginal wells, will be most severely impacted by this rule and respectfully request a review of this issue. We thank you for the opportunity to comment on this very important rule and look forward to working with the Department on this issue.

Response: EPA has reviewed the comment and does not agree that today’s final rule will cause unnecessary burdens on the industry. EPA has determined that for specified emissions sources

for certain industry segments, some reporters may need more time to comply with the monitoring and QA/QC requirements by January 1, 2011. As such, EPA is allowing the use of best available monitoring methods for certain categories. For information regarding the timing for allowing application of best available monitoring methods and other details, please see the response to EPA-HQ-OAR-2009-0923-1196-8. EPA has also made a number of rule modifications that would reduce burden while sustaining the necessary quality of data. For further details, please see Section II.E of the preamble.

Finally, EPA has examined the impact of the rule on small businesses. Information on this can be located in the Economic Impact Analysis (EIA) document in the docket, Section 5.2, or reference comment EPA-HQ-OAR-2009-0923-1151-14.

7.2 STATUTORY AND EXECUTIVE ORDER REVIEWS

7.2.1 PAPERWORK REDUCTION ACT

Comment Number: EPA-HQ-OAR-2009-0923-1151-13

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment: EPA Failed to Fully Account for the Burdensome Impacts to Onshore and Offshore Petroleum and Natural Gas Facilities in its Economic Impact Analysis

As discussed in detail under Section I.B. above, API calculations demonstrate that EPA significantly underestimated the burdens imposed on reporting entities, by a factor of approximately 66 times. EPA's failure to estimate the full cost of proposed Subpart W by dramatically undercounting both the monetary and resource demands imposed by the rule violates statutes and an executive order that require analysis and public review of regulatory burdens. Specifically, EPA's proposal fails to comply with the Paperwork Reduction Act ("PRA"), the Regulatory Flexibility Act ("RFA"), and Executive Order ("EO") 12866. This failure deprives persons potentially impacted by the rule of a meaningful opportunity to comment on the rule in violation of CAA Section 307(d) and the Administrative Procedure Act. In order to fulfill its legal obligations under the PRA, RFA, and EO 12866, EPA must re-do the Economic Impact Analysis taking into account the full impacts of the rule and use the updated cost data to perform the required analysis.

i. Paperwork Reduction Act (PRA)

The PRA requires the Agency to seek approval from the Office of Management and Budget ("OMB") prior to engaging in rulemaking that will involve information collection requirements.⁷⁷ EPA may not "conduct or sponsor the collection of information unless in

⁷⁷ See 44 U.S.C. Sections 3501-3521.

advance of the adoption or revision of the collection of information . . . the Director [of OMB] has approved the proposed collection of information.”⁷⁸ As explained in Section I.B above, EPA underestimated the economic impact of proposed Subpart W by a factor of approximately 66. Therefore, EPA’s submission to OMB under the PRA was deficient for failure to include the costs of these additional information collection requirements on newly regulated entities. The Agency should resubmit the information collection approval request to OMB with a proper and fully inclusive analysis. Otherwise, the Agency will lack authority to collect the GHG emissions reporting data from regulated entities.

Response: EPA disagrees that it has failed to comply with the Paperwork Reduction Act (PRA), the Regulatory Flexibility Act (RFA), and Executive Order (EO) 12866. In accordance with the PRA, 44 U.S.C. 3501 et seq., EPA submitted *ICR 2376.01 – Regulation to Establish Mandatory Reporting of Greenhouse Gases (Subpart W, Petroleum and Natural Gas- Proposed Rule)* and *ICR 2376.02 – Regulation to Establish Mandatory Reporting of Greenhouse Gases (Subpart W, Petroleum and Natural Gas- Final Rule)* to OMB. OMB filed the ICR and approved it before the effective date of The Final Mandatory GHG Reporting Rule (“Final MRR”), (40 CFR part 98). Regarding EPA’s compliance with the RFA, see the response to comment EPA-HQ-OAR-2009-0923-1151-14, Section IV of the preamble, and Sections 5.2 and 6.3 of the Economic Impact Analysis (EIA). Regarding EPA’s compliance with EO 12866, see Section IV of the preamble and Section 6.1 of the EIA. Today’s final rule is compliant with PRA, RFA, and EO 12866. Please refer to it for further details.

Moreover, EPA disagrees that the agency’s cost estimates should be higher by a factor of 66. EPA has reviewed the commenter’s statements about the costs carefully and weighed that input against its EIA. EPA has concluded that while some adjustments were necessary, the Agency’s methodology and assumptions were sound and relied on best available data. In sum, the analyses that EPA conducted pursuant to the PRA, RFA, and EO 12866 are based on best available data and provide an accurate representation of the compliance and implementation costs of today’s final rule. See Section 10.3 of the Response to Comments document for EPA’s detailed response to comments about the cost estimates, in particular comments EPA-HQ-OAR-2009-0923-1151-89 through EPA-HQ-OAR-2009-0923-1151-105. For more information about changes EPA made to the EIA, see response to comment EPA-HQ-OAR-2009-0923-1151-15.

⁷⁸ *Saco River Cellular, Inc. v. Fed. Comm’n Comm’n*, 133 F.3d 25, 28-29 (D.C. Cir. 1998) (quoting 44 U.S.C. Section 3507(a)).

7.2.2 UNFUNDED MANDATES REFORM ACT (UMRA)

Comment Number: EPA-HQ-OAR-2009-0923-0050-7

Organization: Southwest Gas Corporation

Commenter: Jim Wunderlin

Comment: Unfunded Mandate

EPA's proposal to implement this information gathering effort amounts to an unfunded mandate in all of Southwest's rate jurisdictions. This is unfair because it places a significant personnel resource and cost burden on Southwest to gather information in the time frame specified. Recovery of such cost burdens must be approved by our respective state Public Utility Commissions, as mandated by state law and federal regulation.

Response: EPA has reviewed the comment and disagrees that the information gathering effort pursuant to today's final rule amounts to an unfunded mandate. The Unfunded Mandates Reform Act (UMRA) was enacted to avoid imposing unfunded federal mandates on state, local, and tribal governments, or the private sector. The UMRA provisions relevant to the commenter's statement apply to proposed and final rules that include a Federal mandate that may result in the expenditure of funds by state, local, or tribal governments, in the aggregate, or by the private sector of \$100 million or more in any one year. As discussed in Section IV of the preamble to today's final rule, this rule does not contain a federal mandate that may result in expenditures of \$100 million or more for state, local, and tribal governments, in the aggregate, or the private sector in any one year. EPA estimated the cost to individual facilities that may have to report to today's final rule using actual facility characteristics such as throughput and size. EPA also determined the costs to non-reporters for determination to report. The sum of these costs for the entire industry has been estimated to be less than \$100 million. Thus, today's final rule is not subject to the requirements of Sections 202 or 205 of the Unfunded Mandates Reform Act (UMRA).

This rule is also not subject to the requirements of Section 203 of UMRA because it contains no regulatory requirements that might significantly or uniquely affect small governments. Based on EPA's analysis of the rule's impact on small entities (see the Economic Impact Analysis document in today's final rule, Section 5.2), the Agency determined that natural gas distribution is the only industry segment that would potentially have small governments affected by the rule. In this segment, however, the facilities owned or operated by small governments are expected to be too small to trigger the 25,000 metric tons CO₂e reporting threshold. This was also noted in the proposal Economic Impact Analysis of today's final rule.

7.3 MISCELLANEOUS COMMENTS DIRECTLY RELEVANT TO THE GHG REPORTING RULE

Comment Number: EPA-HQ-OAR-2009-0923-1098-1

Organization: Southern Union Company

Commenter: Charles Wait

Comment: Southern Union Company (SU) whose natural gas transmission pipelines include Panhandle Eastern Pipe Line Company, Trunkline Gas Company, Florida Gas Transmission and Sea Robin Pipeline Company offers this letter supporting the comments from its industry organization, the Interstate Natural Gas Association of America (INGAA). As INGAA does, SU applauds EPA's improvements to original Subpart W during the year delay in implementation. However, SU has concerns around the implementation of the rule as currently proposed.

Response: EPA has considered the concerns and, while this particular excerpt does not specify the commenter's specific issues with implementation, has made modifications to the rule to allow the use of Best Available Monitoring Methods (BAMM) in year one under certain circumstances, and will be providing an applicability screening tool to assist potential reporters in determining whether or not they may meet the reporting threshold. Please see Section II of the preamble in today's final rule for more information. In addition, EPA's responses to comments from INGAA can be located throughout the response to comment documents.

Comment Number: EPA-HQ-OAR-2009-0923-1168-1

Organization: Delmarva Power a PHI Company

Commenter: Wesley L. McNealy

Comment: As a supporting member of the American Gas Association (AGA), DPL endorses in full the proposed Subpart W comments filed by the AGA on this docket.

Pepco Holdings, Inc., the parent of DPL, is also a member of the Clean Energy Group and DPL endorses the comments filed by the Clean Energy Group on this docket

Response: EPA reviewed the commenter's statement as supportive to AGA's and the Clean Energy Group comments on the proposed rule. In addition, EPA's responses to comments from AGA and the Clean Energy Group can be located throughout the response to comment documents.

Comment Number: EPA-HQ-OAR-2009-0923-1299-1

Organization: Northeast Gas Association

Commenter: Thomas M. Kiley

Comment: We also express our support for the comments of the American Gas Association (AGA), submitted separately, which address a wide range of issues relating to the design of the reporting process and the details of the proposed regulatory requirements. In our comments, we will highlight some of these same issues, which are consistent with the more extensive AGA comments. We hope that you will take our comments under advisement, to help establish a final set of regulations that are well-designed, reasonable, practical, cost-effective, and efficient. NGA and its member companies are committed to helping improve the environment.

Response: EPA considers this comment as supportive to AGA's comments on the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002). In addition, EPA's responses to comments from AGA can be located throughout the response to comment documents.

Comment Number: EPA-HQ-OAR-2009-0923-1306-1

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment: DTE Energy is a member of the American Gas Association (AGA) and Interstate Natural Gas Association of America (INGAA) and endorses the comments filed by each in this docket. In June 2009, DTE Energy, AGA, and INGAA provided comments on the April 2009 proposed version of Subpart W. We support many of the changes that EPA made to the proposed rule based on comments submitted in 2009. These changes include the list of petroleum and natural gas industry segments in Sec. 98.232, the increased use of engineering estimates and emission factors instead of direct measurement to calculate emissions, and clearer definitions of fugitive and vented emissions.

Response: EPA considers the commenter's views as supportive to AGA's and INGAA's comments on the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002) proposed rule and the commenter's support of the changes made to the April 2009 proposed rule. In addition, EPA's responses to comments from AGA and INGAA can be located throughout the response to comment documents.

7.3.1 GENERAL SUPPORT FOR THE RULE

Comment Number: EPA-HQ-OAR-2009-0923-0040-1

Organization:

Commenter: Anonymous

Comment: The EPA's proposed rule, "Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems," is a step in the right direction.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-0051-2

Organization:

Commenter: Z. Carpenter

Comment: Finally, I think the arguments put forth in opposition of more expansive regulation, namely the parade of horrors recently outlined by the president of the National Association of Manufacturers, John Engler, "If EPA moves forward and begins regulating stationary sources, it will open the door for them to regulate everything from industrial facilities to farms to even American homes . . . [s]uch a move would further complicate a permitting process that EPA is not equipped to handle, while increasing costs to the manufacturing sector. These costly burdens and uncertainty will stifle job creation and harm our competitiveness in a global economy," are not valid concerns given the sophistication and revenue stream of oil producing industries, and the pressing need to "rapidly return to below 350 ppm this century." This is exactly the industry

in which regulation should be most stringent. While I commend the agency's effort to pursue climate control, and acknowledge the formidable opposition posed against expansive regulation of such an influential industry, I think that more needs to be done, and done now, and that the agency should pursue a more expansive and more aggressive regulation agenda than it has

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-0059 -1

Organization:

Commenter: J. Mulcare

Comment: This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-0060 -2

Organization:

Commenter: M. McDonnell

Comment: I agree with this rule to monitor and report emissions.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-0063-1

Organization:

Commenter: T. Trampling

Comment: This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-0582-1

Organization: Western Climate Initiative (WCI)

Commenter: Michael Gibbs

Comment: Oil and gas production, natural gas processing, and gas transmission are significant sources of greenhouse gas emissions in some of the WCI jurisdictions. Unfortunately, due to lack of industry data, the accuracy of emission estimates from some sources in this sector is poor. Accurate quantification and reporting of emissions is critical to better understanding GHG

emission sources, the magnitude of emissions, and the opportunities for reductions. It is for these reasons that we support EPA's proposal to require the reporting of GHG emissions in the oil and gas sector.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-0719-1

Organization: Environmental Defense Fund (EDF) Form Letter Campaign

Commenter:

Comment: Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

EPA has finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action.

We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability and would:

1. Provide policymakers with critical information in the fight against global warming;
2. Ensure transparency for all Americans -- letting us know the largest emitters in our neighborhoods and across the country; and
3. Help hold large emitters accountable for their emissions.

I appreciate your leadership in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.

We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-1016-3

Organization: American Gas Association

Commenter: Pamela A. Lacey

Comment: In our April 2009 comments, AGA also shared and supported the concerns raised by the Interstate Natural Gas Association of America (INGAA) about the impacts of the April 2009 version of Subpart W on natural gas transmission and underground storage facilities, and we urged EPA to withdraw that proposal to allow time to revise it to make it more workable.

EPA has now proposed a revised version of Subpart W that addresses several of the concerns raised by AGA and INGAA, and we thank the agency for making those changes. Although further revision is needed to provide greater clarity to facilitate implementation and enforcement, AGA generally supports the following changes in the 2010 proposed Subpart W:

- Section 98.232 provides a list of specific Subpart W petroleum and natural gas segments and attempts to focus the reporting burden on primary GHG emission sources for each segment;
- Direct measurement requirements have been reduced in favor of using engineering estimates and emission factors to better balance data quality and measurement burdens; and
- Fugitive and vented emissions are now more clearly defined.

Response: EPA thanks the commenter for their remarks. For a comprehensive list of revisions made in today's final rule, please review the content under Sections II.E and II.F of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1029-1

Organization: Western Business Roundtable

Commenter: Holly Propst

Comment: The Roundtable supports the general intention of Congress and EPA in establishing a reporting regime for significant sources of GHG emissions. Certainly, having mechanisms designed and implemented to collect accurate data on major U.S. GHG emissions sources is a reasonable step. In fact, collection of such data seems to us a necessary predicate to the efficient design of any reasonable and effective federal regulatory regime relating to GHG emissions.

EPA's MRR is intended to build off of the CAA Acid Rain program. That makes sense to us as a general point of reference. We also appreciate that EPA's overall approach in the rule seems to be to strike a balance between the need to develop accurate pictures of various sectors' GHG footprints and the cost and resources for individual facilities within sectors to compile and report the data. Certainly, striking that balance is difficult when it comes to the nation's petroleum and natural gas exploration and production sectors.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-1155-1

Organization: Clean Air Task Force et. al.

Commenter: Pamela Campos

Comment: Excellent climate change policy requires excellent data. We stand behind EPA's efforts to secure more detailed data in order to make fact-based policy decisions for petroleum and natural gas systems. In general, we support EPA's proposed rule for mandatory reporting of greenhouse gases (GHG) for petroleum and natural gas systems, set out at Fed. Reg. Vol. 75, No.

69, 18,608 (April 12, 2010); nevertheless, we offer a number of comments and recommendations to strengthen the proposed rule.

Response: EPA thanks the commenter for their remarks. For a list of changes made, please review the content under Sections II.E and II.F, in the preamble of today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1171-2

Organization: Western Resource Advocates

Commenter: Robert Harris

Comment: We commend EPA for recognizing that onshore petroleum and natural gas production and processing activities are a significant source of greenhouse gas ("GHG") emissions.

Generally, WRA believes that the Proposed Rule provides a strong foundation for monitoring and reporting GHG emissions from onshore petroleum and natural gas systems. Specifically, we strongly support requiring reporting of 2011 emissions in 2012. Additionally, we agree that the reporting threshold should be no higher than 25,000 metric tons CO₂e per year. However, even though the Proposed Rule is for reporting and monitoring only, it should be improved to further promote the reduction or elimination of GHG pollutants emitted by oil and gas facilities, consistent with the goals of the Clean Air Act, 42 U.S.C. § 7401.

Response: EPA thanks the commenter for their remarks. In regard to improving the rule to further promote the reduction or elimination of GHG pollutants, this rulemaking is only related to the collection of emissions data and therefore emissions reduction technologies and practices are beyond the scope of today's final rule. Please see Section I.B of the preamble for additional information on the background for today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1197-1

Organization: NiSource, Inc.

Commenter: Kelly Carmichael

Comment: Overall, NiSource supports gathering accurate emissions data, while minimizing administrative burden, to ensure an accurate accounting of each sector's emissions, as well as to serve as the base for future legislative and regulatory program development. NiSource further believes that the effort and resources required collecting greenhouse gas emission data should be commensurate with the magnitude of the emissions level and the associated value derived by collecting the data in contributing towards the overall program management of greenhouse gases.

Response: EPA has made revisions to the monitoring, measurement, and estimation of GHG emissions in today's final rule so as to assure that good data is collected while minimizing burden.

Comment Number: EPA-HQ-OAR-2009-0923-1201-1

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment: This proposed mandatory greenhouse gas reporting rule for the oil and gas sector is a critical addition to the reporting requirements already finalized in 2009. These mandatory reporting requirements (MRR) are an essential first step towards what we hope is EPA's commitment to developing comprehensive climate policy and regulation. We urge EPA to finalize these reporting requirements for the oil and gas sector as expeditiously as possible and in time to allow for data collection to begin in 2011. This sector already, in effect, received a one-year extension on the mandatory reporting requirements when EPA did not finalize reporting requirements for this sector along with the final MRR issued on October 30, 2009 (74 FR 56260).

Response: EPA thanks the commenter and notes that today's final rule requires data collection in 2011.

Comment Number: EPA-HQ-OAR-2009-0923-3568.2-1

Organization: Clean Air Task Force

Commenter: Bruce Hill

Comment: We are also pleased that EPA has issued the supplemental proposal to EPA's Subpart W Rule governing monitoring and reporting of fugitive, vented and flared greenhouse gas emissions from the oil and gas industry.

We believe the inclusion of oil and gas facilities is well within the authority provided by Section 114 of the Clean Air Act. Accurate accounting for these emissions is important in establishing comprehensive greenhouse gas inventories and for developing reduction strategies.

In particular, we believe quantifying sources of methane emissions is critical in pinpointing areas where reductions and climate forcing can be expeditiously achieved. Because methane is a short-lived pollutant with a global warming potential many times greater than carbon dioxide, a methane emissions reduction strategy informed by this data could have significant near term benefits.

Finally, we applaud EPA's proposed reporting for onshore petroleum and natural gas production and distribution facilities. Taken together, the fugitive, vented and flared methane and CO₂ emissions represent one of the largest sources of greenhouse gas emissions from the industry.

Thank you for the opportunity to comment and we'll be providing detailed written comments by the deadline.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-3568.3-1

Organization: Sierra Club

Commenter: Anne Harvey

Comment: Regarding oil and gas systems, EPA's expanded oil and gas monitoring programs is a major – systems category is a major step forward. Tracking emissions from well to pump for this industry is critical. We are particularly pleased that EPA is moving toward comprehensive reporting for the entire life cycle of onshore oil and gas. This is particularly important because onshore gas development and shale gas is being touted as a way to replace coal fired power plants, with natural gas. Accurately measuring the emissions from these fields including fugitive emissions of high global warming potential methane, provides a way to critically assess these claims and to constrain the greenhouse gas impacts of this potential transitional fuel.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-3568.5-1

Organization: Environmental Defense Fund

Commenter: Peter Zalzal

Comment: As to Subpart W, the U.S. petroleum and natural gas industry is sizeable encompassing hundreds of thousands of wells, hundreds of processing facilities and over a million miles of transmission and distribution pipelines. Collectively, these facilities produce significant greenhouse gas emissions which EPA estimated 351 million metric tons of CO₂ equivalent or roughly 11 percent of all emissions covered by EPA's final mandatory greenhouse gas reporting rule. Given the considerable scope of these emissions, collecting facility level greenhouse gas emissions data from this sector is essential. Moreover, to maximize the benefits of the reporting rule, the rule must reinforce the two pillars of any well-designed reporting scheme. The rule must capture the proper scope of emissions and it must produce accurate data.

Response: EPA thanks the commenter for their remarks. To review the scope of emissions and methods for measuring and calculating GHG emissions under today's final rule, please refer to Sections II.C through II.F of the preamble, as well as Section 98.233 in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-3568.5-5

Organization: Environmental Defense Fund

Commenter: Peter Zalzal

Comment: In all, EPA's proposed oil and gas reporting rule is an important step in providing policymakers and the public with data from the oil and gas sector facilitating sound greenhouse gas policy decisions.

Response: EPA thanks the commenter for their remarks.

Comment Number: EPA-HQ-OAR-2009-0923-1032-1

Organization: State of New Mexico

Commenter: Jim Norton

Comment: The New Mexico Environment Department supports EPA's proposal to include emissions from leased, rented or contracted equipment in the emissions required to be reported by onshore petroleum and natural gas production reporting entities. As described in detail below, we support this proposal for the following reasons:

- 1) Contractor emissions account for a significant fraction of emissions from the onshore oil and gas production segment;
- 2) Defining contractors as reporting entities would create problems with compliance and coverage of emissions; and
- 3) Owners and operators can control relevant aspects of the contractor's performance through terms of the contract.

Response: EPA agrees with the comments. Please refer to the preamble, Section II.F in today's final rule which discusses the need for collecting emissions data from contractor sources such as portable equipment.

Comment Number: EPA-HQ-OAR-2009-0923-1018-11

Organization: Canadian Association of Petroleum Producers

Commenter: Rick Hyndman

Comment: Pre-ample-page 52, "Also due to the unique nature of the industry, EPA believes that it may be possible that onshore petroleum and natural gas production equipment from onshore petroleum and natural gas production facilities may be co-located with other manufacturing facilities already covered under other subparts of the rule (e.g., cement manufacturing facilities or glass manufacturing facilities). It is not EPA's intent to have these manufacturing facilities include emissions from onshore petroleum and natural gas production equipment in their threshold determination. EPA seeks comment on this approach".

- CAPP agrees with this approach.

Response: EPA agrees with the comment and has retained the threshold approach discussed in this comment.

7.3.1.1 GENERAL SUPPORT – DOES NOT REQUIRE A RESPONSE

Summary Response:

EPA received a substantial number of comments through organized form letter campaigns and from private citizens with the solicitation of comments on today's final rule. In some cases commenters express specific support for the rule and the objectives of the mandatory reporting rule. There are also a number of comments which support EPA overall but do not specifically support the rule. The list of comments below are being published here to recognize all input

received by the EPA, but they are not being responded to individually since they do not make specific recommendations which may influence the content or methodologies in today's final rule.

EPA appreciates the participation of these commenters in the rule making process. To the extent that other commenters provided more extensive input on the rule itself, those comments are addressed elsewhere in this and other volumes of the Response to Comments.

Sierra Club Form Letter Comment:

If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

Environmental Defense Fund Form Letter Comment:

Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

EPA has finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action.

We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability and would:

1. Provide policymakers with critical information in the fight against global warming;
2. Ensure transparency for all Americans -- letting us know the largest emitters in our neighborhoods and across the country; and
3. Help hold large emitters accountable for their emissions.

I appreciate your leadership in cutting harmful air pollution, reducing our dependence on

destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.

We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.

Credo Form Letter Comment:

I am writing to urge you to apply the EPA's new methane regulations to all polluters, including oil and gas companies.

When solutions to global warming are discussed, methane usually gets far less attention than carbon dioxide. But any effort to tackle climate change must also address the problem of methane emissions.

Though less abundant than CO₂, methane traps 25 times more heat. That's the bad news. The good news is that, while CO₂ persists in the atmosphere for 100 years, methane dissipates after only 10. That means reducing methane gas now should bring solid results in the near term.

Landfills, industrial farms, coal mines, and producers of oil and natural gas are all major methane contributors. In September the EPA took a step toward mitigating these sources by establishing rules requiring them to report their methane emissions. But the EPA exempted oil and gas companies from the rules.

This is a significant loophole. The EPA should act to reduce methane emissions by all industries, including oil and gas. Please tell me how you intend to address this issue.

Other Unique Comments:

Comment:

“We desperately need help here in Texas with our air quality issues. The state is unable or unwilling to regulate natural gas and oil production and development in Texas.

I personally live 5 blocks from gas well in production in Denton Texas and have called the Texas Railroad Commission about a toxic drilling mud spill and TCEQ about excessive emission. The field inspectors noted plumes coming from the site and odor but did not test the air quality. The Texas Railroad Commission called the toolpusher on the drilling site and ask them if they spilled and informed the drillers they would be out in the morning to inspect site and we have video of Pioneer drilling covering up the spill site overnight before the state showed up. We are doomed

unless intervention is taken to regulate, enforce, and protect our environment.” (EPA-HQ-OAR-2009-0923-3482-1)

Comment:

“On oil and gas they can drill in urban areas using power from the power grid cutting down diesel exhaust which is toxic the drilling can be done with a green completion as well as any and all vapor recovery.

This is important to me since I have had drilling by my home over 2 1/2 years and had no say in this process. Their fumes would set off my carbon monoxide detector in the middle of the night many times and I have no gas in my home and the outside air at those times smelled like I was in the middle of an oil refinery, while I am in the heart of Arlington, TX

No one has the right to almost kill me over Greed and that is what this drilling in urban settings is all about since the university whose property this is on has received over \$5.5 million dollars to date and all our neighborhood has received is abuse. Do not go and make a complaint in person because to harrass they file a complaint with their police.

I made health complaints in person and the police were at my door within 2 hours. Even after that I had their UTA police just sit in front of my home. The City of Arlington stated they could not help because the university of Texas Arlington claimed state entity. Please listen to my cry for help since the TCEQ has not helped always denying any problem.”(EPA-HQ-OAR-2009-0923-2877-1)

Comment:

“I am someone who live 5 blocks from an urban well in Denton Tx. I have contacted the TCEQ at least 7 times regarding excessive exhaust causing coughing, headaches, nausea, and every time the TCEQ has found nothing to be concerned about. Our neighborhood was so concerned about our air quality we paid for our own air study which showed elevated levels of Toluene, Methane, Carbon Disulfides, and Benzene. Ironically the TCEQ tested on the same day at the same time and found nothing. I was even told by a field agent "we never find anything". On one complaint I have documented evidence of a field agent responding to a complaint observing a plume rising from the drilling site, smelling an odor. When she went on to the site to do testing she was told by an employee for the drilling company they were to "busy" to answer her questions and she could not test on the site. She left without testing.

We have observed dumping of raw sewage and a toxic mud spill. We call the TEXAS Railroad Commission and our local emergency responders. I watched our emergency responders standing around and watching Range Resources bulldozing the spill into a culvert on the neighboring

property. The TRRC called the tool pusher to inquire about the spill and tell Range they would be out in the A.M. to investigate. Needless to say Range Resources worked on a bulldozer pushing dirt from one side of the property to another. Of course the TRRC went out the next morning and could find no evidence of a spill. We have the employees on the site admitting on our blog to dumping the sewage from their black water holding tanks on to an adjacent property because "everyone does it" The city responded to the complaint 4 weeks later and after calling Range to ask them if they were dumping raw sewage the day of the complaint. Of course by 4 weeks all the evidence I video was gone. This is just on gas well in town imagine what is going on in the rural area where no one is watching! We need help in Texas!"(EPA-HQ-OAR-2009-0923-3482-1)

Comment:

THE OIL AND GAS INDUSTRY MUST BE HELD ACCOUNTABLE FOR WATER, AIR AND SOIL POLLUTIONS FROM HYDROFRACKING NATURAL GAS DRILLING OPERATIONS. MONITORING AND REPORTING SYSTEMS MUST BE ACCURATE AND EVALUATED BY ALL APPROPRIATE FEDERAL AGENCIES, EPA AND INCLUDING CDC AND ATSDR. PUBLIC HEALTH AND ENVIRONMENTAL HEALTH MUST BE PROTECTED. INDUSTRY WON'T DO IT, SO THE GOVERNMENT MUST!

Comment:

"We appreciate your strong leadership in reducing harmful air pollution and ensuring full disclosure and transparency of green house gas emissions from the oil and gas industry." (EPA-HQ-OAR-2009-0923-3166-4)

Comment:

"The public has the right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.

I appreciate your leadership in cutting harmful air pollution, reducing our dependence on oil, and creating new job opportunities. Thank you." (EPA-HQ-OAR-2009-0923-3549-1)

Comment:

“Have I entered a time warp? I feel like we've done this before, around 40 years ago. Please ensure that these corporations so intent on destroying our environment are required to post their data on greenhouse gas emissions. We deserve to know what we are breathing and what the particulates are in our air as they relate to the warming of the earth.

I hope you will provide strong leadership on this and demand that these polluters tell us what they are poisoning us and the planet with.”(EPA-HQ-OAR-2009-0923-3548-1)

Comment:

“Thank you/ EPA for finalizing global warming pollution disclosure requirements. Now, I urge you to make every effort to over-ride attempts by the oil and gas industry to delay protective EPA action and implementation of full disclosure of their pollutants based upon actual emissions data. They must be held transparently accountable!” (EPA-HQ-OAR-2009-0923-3552-1)

Comment:

“With all that has happened this week with both oil and gas disasters, we need strong leadership from the EPA and all government agencies more than ever. These mega-corporations who treat our planet so cavalierly must be held to account. Their obscene profits should be used to clean up their depredations before distribution to their shareholders and top management.

Disclosure of emissions is but one step. Don't let these clean air thieves stop you from taking it. Thank you.” (EPA-HQ-OAR-2009-0923-3367-1)

Comment:

“Dear Administrator Lisa Jackson,

We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.” (EPA-HQ-OAR-2009-0923-2414-1)

Comment:

“As citizens of the State of Florida, we have the right to know all about the pollution being emitted by thousands of facilities in the oil and gas industry.

We Please finalize comprehensive, rigorous requirements for the oil and gas industry to fully disclose the pollution being emitted by the catastrophe in the Gulf and the entire oil and gas industry. We clearly cannot rely on data from the industry.”(EPA-HQ-OAR-2009-0923-2955-1)

Comment:

“Some people believe human-caused global warming exists and others do not. One thing is certain. Countless facilities run by the oil and gas corporations definitely emit air pollution that kills people.

EPA has finalized air pollution disclosure requirements that most corporations must comply with. The oil and gas corporations know the disclosure requirements will reduce their profits a little. I don't know how it happened, but corporate oil has convinced EPA management to delay the implementation of these regulations.

I am aware that large corporations control America. There's a point when they overstep their bounds. This is one of them. Please start enforcing these important regulations ASAP. The health of American citizens depends on it.”(EPA-HQ-OAR-2009-0923-0668-1)

Comment:

“Dear Administrator Lisa Jackson,

Of course polluters should be required to disclose fully the extent of their pollution. We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.”(EPA-HQ-OAR-2009-0923-3404-1)

Comment:

“While EPA has outlined pollution disclosure requirements for big pollution emitters, the oil and gas industry has been spared. Now with the Gulf of Mexico oil spill disaster looming large and long on the American public, the question is: why doesn't the EPA impose disclosure requirements of pollution data for the oil and gas industry?

It is most important that the EPA rein in the oil and gas sector on pollution in order to address global warming. No more coddling the oil and gas sector.”(EPA-HQ-OAR-2009-0923-2493-1)

Comment:

“Dear Administrator Lisa Jackson,

Please go ahead with efforts to establish comprehensive pollution disclosure requirements for large greenhouse gas emitters in the oil and gas industry. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.”
(EPA-HQ-OAR-2009-0923-3387-1)

Comment:

“Please make sure the public is informed about pollution associated with the danger of global warming by a lot of facilities in the oil and gas industry. We need your leadership to enforce disclosure of information these facilities have not made available or may not even gather. What we need is comprehensive, quantified assessments of emissions, not just estimates (an example is the seeming reluctance of BP to accurately assess the number of barrels/day of crude oil their out-of-control well is currently producing).

I appreciate your leadership in reducing harmful air pollution. Thank you.” (EPA-HQ-OAR-2009-0923-3315-1)

Comment:

“I have just watched my daughter graduate from Southwest High School here in Minneapolis, MN, and as I watched her cross the stage to receive her diploma I didn't know whether to feel hopeful or pessimistic about her future. I DO believe that your actions in the EPA can make a difference in her quality of life. I urge you to require the oil and gas industry to be accountable for their share of the pollution of our air and water, and that you require them to disclose their emissions data. It is a good step in the direction of responsibility and accountability---the same qualities I ask of my graduating daughter.” (EPA-HQ-OAR-2009-0923-2938-1)

Comment:

“This is the perfect moment to require the oil and gas industry to disclose its global warming pollution--its actual measured emissions data. I can only imagine that most American citizens would approve, given the continuing horrific situation in the Gulf of Mexico. There is no reason to exempt this industry from a requirement that applies to other big emitters. (And I have gotten a little money from the oil and gas industry--full disclosure.)

With the required information, we could make better public policy, keep our citizens informed about sources of pollution, and hold emitters accountable.

Please take the lead in this area and help reduce our American carbon footprint! Thank you.” (EPA-HQ-OAR-2009-0923-3137-1)

Comment:

“I am writing to urgently request that the EPA establish global warming pollution disclosure requirements for the oil & gas industry. This is imperative in order to provide the public with

necessary information and to ensure transparency and accountability necessary to ensure the protection of our environment. It is intolerable to allow the oil & gas industry to continue to push to delay this protective action.

Thank you for your consideration of this matter. We would greatly appreciate your continued leadership to ensure that strong and comprehensive disclosure requirements become our new standard.”(EPA-HQ-OAR-2009-0923-2635-1)

Comment:

“I also believe we need full disclosure of all global warming pollution emitted by the oil and gas companies.”(EPA-HQ-OAR-2009-0923-2871-1)

Comment:

“We need for the EPA to be taking a much stronger stand to protect our environment. You should be requiring BP to disclose every ingredient in the dispersants used and standing over them to make sure they are doing everything possible to clean up the environmental disaster they have caused. Our citizenry is counting on you to reign in the oil and gas industries.”(EPA-HQ-OAR-2009-0923-2590-1)

Comment:

“Enough is enough! This is the country of "we the people", not "we the corporations who do anything to make a profit regardless of what is good for the people".

I am writing you to implore you to do your part to ensure a livable future for us and our children's children. The lack of accountability for these corporate polluters is unconscionable and criminal. You can play a critical role in stopping the looting and destruction of resources that are the inheritance of ALL of us.”(EPA-HQ-OAR-2009-0923-2850-1)

Comment:

“With our rapidly dwindling o-zone layer, we cannot wait any long for regulation. And yet vital regulations have been delayed. This is unacceptable, because we are running low on time as it is. We must act now before it is too late. I urge you to establish comprehensive pollution disclosure requirements for large greenhouse gas emitters in the oil and gas industry. For our children and our planet, please do so.”(EPA-HQ-OAR-2009-0923-3302-1)

Comment:

“BP and the oil spill is hurting our one and only planet. We need to fix this problem before the oil continues to spread and pollute the ocean. If we don't do something about it soon, it will take over the entire ocean and it will be too late. All marine life is at risk here, thus endangering the livelihoods of millions. This could lead to worldwide famine within a year or two, thus spreading disease and threatening all of humankind. We need to stop this horrible chain before it continues. The government should declare this an emergency and call upon thousands of engineers and scientists to all work on fixing this problem and stopping the oil spill. BP needs to be held 100% accountable for their mistake that is causing pain to our beautiful planet and its inhabitants. They deserve to go bankrupt after all that has happened, and all the money that they currently have should go to fixing this issue. If we don't stop it now, it will impact the way we live forever.”(EPA-HQ-OAR-2009-0923-2755-1)

Comment:

“Please correct the loophole that allows the oil and gas industry freedom from accountability for their pollution through emissions.”(EPA-HQ-OAR-2009-0923-2421-1)

Comment:

“Please hold the Oil and Gas Industry, as well as, the other big businesses (domestic and abroad) accountable for their mistakes and misfortunes as far as the environment is concerned.”(EPA-HQ-OAR-2009-0923-1853-1)

Comment:

“Like many citizens, I strongly support the EPA's proposal to include the oil and gas industries in [your] reporting system. Transparency and accountability is A MUST in this regard, as pollution affects us ALL.”(EPA-HQ-OAR-2009-0923-2763-1)

Comment:

“I believe that the oil and gas industry must follow the same rules that others follow if we are to achieve the goal of protecting our water supply and our planet. I understand that the EPA is proposing to include these industries in the system - and I support this decision.

We can and should use our natural resources but ONLY if we do so fairly and safely. Thank you for your work.”(EPA-HQ-OAR-2009-0923-1917-1)

Comment:

“Don't let the oil companies make out with all the profits without assuming the risks. Don't make taxpayers foot the bill for their greed. Require better safety measures be in place....better yet, end offshore drilling entirely and require investment into renewable energy research.

Whatever you don't, get the heck away from the status quo.”(EPA-HQ-OAR-2009-0923-1932-1)

Comment:

“Enough is exactly that, enough. So sick of the big oil companies continue to get away with everything. Not only off-shore but on-shore too. Leak after leak.

There is no excuse for what is happening in the Gulf of Mexico. Prior to getting any kind of permit BP should have had remedies in place, ready at a moments notice to stop any situation. Here we are almost 2 months post explosion with no cure in sight. NOT ACCEPTABLE.”(EPA-HQ-OAR-2009-0923-2769-1)

Comment:

“There is no reason that the oil and gas industry should be exempt from reporting their emissions. Please hold them accountable.”(EPA-HQ-OAR-2009-0923-2804-1)

Comment:

“No more off shore drilling - Make BP compensate for damage stricter regulations - % of oil profits go to relief fund for damages.”(EPA-HQ-OAR-2009-0923-2373-1)

Comment:

“The BP disaster has sent clear message.

I urge you to support the EPA proposal to require the offshore, as well as onshore, oil and gas industries to report their greenhouse gas emissions. The strong lobby of the gas and oil industries should not be allowed to exempt them from their global responsibilities!”(EPA-HQ-OAR-2009-0923-2385-1)

Comment:

“Everyone I know is shocked by the massive oil spill (gusher, rather) that is STILL GOING in the gulf. And we are very angry at BP for it's negligence and priority to escape any blame. This company must pay for the damage.

BP and the rest of the oil companies must be included in the greenhouse gas reporting rule, and the EPA must stand firm in making the industry do so.”(EPA-HQ-OAR-2009-0923-1557-1)

Comment:

“Start protecting us and the environment. That is your job.”(EPA-HQ-OAR-2009-0923-2274-1)

Comment:

“I have great faith in the current administration and your capability to get things done. What this disaster amplifies is the need to change our ways. By all means, hold BP, TransOcean and Halliburton accountable.

PLEASE also voice the need to mobilize every American against the dangerous reliance on oil. Use this tragedy to call for a better awareness and a concerted effort to change our habits. WE caused this problem. All of us. If consumers don't feel the full price of their actions, they won't change, and neither will the corporations.”(EPA-HQ-OAR-2009-0923-2258-1)

Comment:

“I support your inclusion of the oil and gas industries in the mandatory greenhouse gas reporting rule.

I urge the EPA to do everything in its power to rein in these industries, reduce greenhouse gas pollution, and support the transition to a green economy.”(EPA-HQ-OAR-2009-0923-2384-1)

Comment:

“It's way beyond the time to hold big business accountable for their actions. Big oil has been lobbying for years to influence decision makers to turn a blind eye to their shenanigans...and to top it off, they get big subsidies to continue their raping of the planet's resources. AND, furthermore they don't even have to pay TAXES with their off-shore havens and figurehead out-of-country corporations. They have gained an "untouchable" status and considered "too big to fail". It has gone TOO FAR and TOO LONG. It is time for accountability. If I were to drag one (1) barrel of oil to the nearest pier, an drop it into the ocean...I would be arrested, thrown in jail and fined heavily. BP has dumped millions of barrels into the ocean, contaminated hundreds of miles of shoreline, killed eleven people so far, ruined the fishing industry, bungled a lame attempt to "clean-up", devastated natural animal habitats, destroyed the beaches, and generally devalued the quality of life for hundred of thousands of citizens. This disaster that BP has created, all for their giant profits, has GOT TO BE STOPPED. If it takes all the money they

have, this suffering area has got to be returned to it's former condition. Furthermore, BP has proved that there are NO safeguards to drilling at sea, and there is NO proven containment technology currently available. therefore, there should be NO OFF-SHORE DRILLING ALLOWED...period.”(EPA-HQ-OAR-2009-0923-2275-1)

Comment:

“The behavior of BP is appalling, and the rest of the oil and gas industry is no better. I strongly support the EPA's proposal to require greenhouse gas reporting for the entire oil and gas industry, onshore and offshore. I realize that such measures, and the resulting pressure to reduce emissions, may raise the cost of gasoline and other consumer products, in the short run. But the long term gains from a healthier environment in which our children and grandchildren will live makes this a cost I will gladly take on.”(EPA-HQ-OAR-2009-0923-3554-1)

Comment:

“I support the EPA decision to hold the oil and gas industry accountable for their pollution and global warming emissions. I would like to see a total ban on drilling in the ocean. Short of that, I urge you to ensure the industry's emissions are included in the reporting system as soon as possible. The oil and gas industry MUST be held accountable. Thank you.”(EPA-HQ-OAR-2009-0923-1566-1)

Comment:

“Big Oil and Gas must be held accountable. The EPA has decided to put the oil & gas industries within the mandatory greenhouse gas reporting rule. I strongly support that decision and urge you to do this as soon as possible, employing rigorous and detailed measurements.” (EPA-HQ-OAR-2009-0923-2521-1)

Comment:

“It is time to make some real changes to protect our environment. This oil spill is the trigger to help motivate us to finally make that happen. These spills are nothing new and the failed tactics BP is using to try and stop the leak have also been done in the past. This is unacceptable and BP should be held accountable as well as law-maker and the negligent regulators. Stop off-shore drilling and put into place wind, solar and other alternative fuel infrastructures. Use Denmark as a model that we in the U.S can use and even improve upon. Do not let this opportunity slip by. We have failed with effective healthcare, financial regulation, education and our toxic food supply and to fail again will sink us deeper into a pit we can't get out of. Enough is enough, I am tired and weak and need you to lift me and our society up.”(EPA-HQ-OAR-2009-0923-1496-1)

Comment:

“Please, for once, protect the public interest and natural resources over corporation profits.”
(EPA-HQ-OAR-2009-0923-1693-1)

Comment:

“We cannot continue to let the oil industry skate along without making changes that are necessary to protect the environment. They have proven that while they are masters of making profits, they are extremely poor stewards of the planet. They have grown technologically in their ability to find oil and to cut their costs, but their ability to deal with the catastrophes that they cause is medieval and lackadaisical whether it deals with their exploration, spills or refining. Please do not let them weasel their way out of being held accountable for their emissions. Please make certain that rigorous emissions accountability is imposed on the oil and gas industry.”(EPA-HQ-OAR-2009-0923-3553-1)

Comment:

“Much has been said about this current oil spill, and the talk will continue for the next decade. The EPA needs to remember what its primary function is: protection of the environment.” (EPA-HQ-OAR-2009-0923-1753-1)

Comment:

“Just like the financial meltdown on Wall Street demonstrated, the environmental disaster in the Gulf of Mexico shows that government regulation is lax to the point of nonexistence. We need across the board strengthening of regulations for all industries: energy, banking, agriculture, insurance and more. Not only is the government not protecting the American public and environment, it's clear that government has been a willing participant in the fleecing of the citizenry. This is most apparent with the cozy relationship between big oil and the Minerals Management Agency. The oil industry must be held accountable for its destruction and ALL drilling must come with appropriate environmental impact reports, redundant safety procedures and criminal prosecution of those that foul our environment due to negligence, greed or stupidity. All offshore drilling must be stopped until big oil can prove that it can prevent the sort of disaster that is now unfolding in the Gulf.”(EPA-HQ-OAR-2009-0923-2536-1)

Comment:

“Do you remember the Republican Chant before the 2008 election.... DRILL DRILL DRILL DRILL..... I firmly believe that all the oil and gas companies that are drilling should be held accountable for their potentila proplems. Since they are making record profits, the obviously

have the money to clean up (or at least be prepared to clean up) disasters they cause. It is amazing to me that more is not being done to help protect the environment.

These large oil companies have lobbied out of the greenhouse gas laws that are mandatory for everyone else,

This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.

YES WE CAN!!! Coroporations SHOULD NOT run this country.” (EPA-HQ-OAR-2009-0923-1470-1)

Comment:

“This earth has been here for a long time. I'm of the impression she knows what she's about. You men are breaking things that can't be fixed. You are a cancer.

You need to play by the rules, or the whole ship sinks, not, unfortunately, just you.”(EPA-HQ-OAR-2009-0923-2197-1)

Comment:

“We cannot afford to have additional oil spills such as the one with BP. Please hold the oil & gas industry accountable by ensuring that they measure and report levels of pollution and emissions.” (EPA-HQ-OAR-2009-0923-1638-1)

Comment:

“I strongly support the EPA decision to require the oil and gas industry to track and report its massive global warming pollution emissions under the mandatory greenhouse gas reporting rule. It makes me sick that BP had profits in the range of \$6 Billion a quarter, and yet cut corners on safety (not to mention their crazy idea of drilling at the bottom of the gulf in the first place! Who approved that?!). No doubt BP probably expects the federal government to pay for their clean up. BP needs to spend every last dime they have cleaning up their mess, and if that's not enough, the other oil companies should pitch in. It's time to make big oil accountable for destroying our planet. Forcing them to report on their global warming pollution emissions is part of that.”(EPA-HQ-OAR-2009-0923-2173-1)

Comment:

“The oil and gas industry must be held accountable for their polllution emissions. I understand the industry lobbied its way out of the mandatory greenhouse gas reporting rule. Why do they fear tracking their pollution emissions? It doesn't take long to figure out why. This year, the EPA

is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system.

It is my hope you will support that decision. It is important that the oil and gas industry's emissions are included in the reporting system as soon as possible.”(EPA-HQ-OAR-2009-0923-1595-1)

Comment:

“What are you doing to stand in the gap for your country? The individuals in public office have a responsibility to our country to be sure WE ARE ALL held accountable for what we do and that includes the gas and oil industry. I know they are very powerful and have deep pockets and great influence, but here is where you have a choice that will effect the outcome of this country in this area of industry. Where do you stand?”(EPA-HQ-OAR-2009-0923-1903-1)

Comment:

“I urge you to include ALL of the oil industry's emissions, off shore or otherwise, in the mandatory greenhouse gas reporting rule. It looks suspicious that this part of their business was excluded up until now. The EPA needs to close this loophole completely, enforcing honest and complete reporting of greenhouse gases.”(EPA-HQ-OAR-2009-0923-1354-1)

Comment:

“Please hold BP accountable for the Gulf disaster. Don't cave in to lobbyists but make the oil and gas industries report their pollution emissions.”(EPA-HQ-OAR-2009-0923-1827-1)

Comment:

“I am sick and tired of watching the petrochemical industry have free access to public lands and seas and despoiling them at the cost of taxpayers. Superfund cleanups, toxification of our lands and restricted public access are just some of the inequitable practices to which extraction industry advocates have tethered our energy policy. If we wanted more corrupt government-oil industry policies, we would all be hollering for Dick Cheney to head the MMS. To grant more leases for offshore and onshore oil drilling only benefits a limited segment of our nation; it sure as hell isn't going to alleviate our dependence on oil by drilling in North American waters. It does keep oil executives rich along with the politicians that accept lobbyist dollars to secure their offices. As for drilling the sea floor at the astronomical pressures in deep water exploration, I wouldn't even trust Bob Ballard and his expertise to work on the sea floor at those depths. It's patently absurd and equally as arrogant to believe we have adequate technology to circumvent disasters; we have more expertise getting to the moon so tell those jerks from BP, Shell, Exxon

Mobile and the rest, to go drill on the damn moon and leave what remains of an intact biosphere to those of us who rely on it more than oil and money.”(EPA-HQ-OAR-2009-0923-2008-1)

Comment:

“The heartrending devastation in the Gulf - wrought by carelessness, greed and BP's outright criminal negligence clearly illustrates the need for corporate accountability. Shamefully, just last year, the industry was able to lobby its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. Currently, the EPA has proposed setting things right - finally including both offshore and onshore oil/gas industry in the system. All thinking, caring, people strongly support that decision. Please ensure the system uses stringent, detailed/definitive, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. Adequate regulation may help prevent future environmental catastrophe. Profit motivated, "penny-wise pound-foolish" corporate ideology must be prevented from repeatedly wrecking havoc in our nation - the EPA must help protect us. Thank you.”(EPA-HQ-OAR-2009-0923-1937-1)

Comment:

“In this era of Big Oil-Big Bucks, we are either a have or have not====the have nots are at the mercy of the haves.

When a major company such as BP is awarded the big job it got, but somehow messed up along the way. and is now saying that the leak will not be stopped until late August, they have questions to answer. That work was their responsibility and I am certain are going to be paid handsomely for it. Our wildlife and our human life are at risk, as is our land. They refuse to be accountable for this humongous mishap? I think that disgraceful behavior on the part of a world renowned prestigious organization. I am furious!! What they "broke", they must fix!! They should stand behind the work they do--honorable people/agencies do. They are accountable -- and whatever it takes for the situation to be righted, the EPA should enforce. One Katrina was enough.

This country should stand behind our President as he moves forward in the proper direction in this matter....full support. And, we must demand FULL BP accountability....”(EPA-HQ-OAR-2009-0923-3558-1)

Comment:

“Either you are in bed with the oil and gas industry or you are on the side of the people. This is not debatable.”(EPA-HQ-OAR-2009-0923-3562-1)

Comment:

“The American people are angry about business as usual in Washington, which includes special favors and exemptions for moneyed interests. This is corruption, and it has to stop! Our world is falling apart, and if there are to be any solutions, we need to start with honesty and a level playing field.

Please don't allow any exemptions to the greenhouse gas reporting rule - for BP or for any other major source of pollution.”(EPA-HQ-OAR-2009-0923-2157-1)

Comment:

“Wake up and smell the oil! One thing is crystal clear from the BP disaster (and it sure isn't the water!!) - the Oil Corporations must be held accountable. To consistently ignore and subvert the policies that are meant to protect the Whole Earth is beyond reprehensible.

When the oceans die, we all die. There won't be any more oxygen in the gated communities of Connecticut and Georgetown than in the slums of Detroit and New Delhi.”(EPA-HQ-OAR-2009-0923-2083-1)

Comment:

“It only makes sense- scientifically and ethically- to track all emissions so that we know our effect on global warming. Thank you for requiring all emissions from oil and gas including of and off-shore to be reported. We only have one home let us never forget.”(EPA-HQ-OAR-2009-0923-3555-1)

Comment:

“This is just the disaster we all feared: A bold, arrogant venture into such deep depths without adequate safeguards. And then, they (oil companies) want a cap on costs of damages. What should happen to them? They, of course, think that it is the price of doing the business of oil. It is not and all Americans need to suffer the consequences of this spill as well as oil companies. Increase the federal tax on all oil to pay for this cleanup. The enemy is us and we should pay.” (EPA-HQ-OAR-2009-0923-3559-1)

Comment:

“Whatever the oil, gas and coal industries do effects my environment. For that reason I have every right to know everything they they do. They must be held 100% accountable for every action taken with no loopholes in which to hide.”(EPA-HQ-OAR-2009-0923-3560-1)

Comment:

“The oil and gas industry must be held accountable. I support the EPA proposal to include the offshore and onshore oil and gas industry in the system and to ensure that the rigorous pollution measurements are included in the reporting system as soon as possible.”(EPA-HQ-OAR-2009-0923-2857-1)

Comment:

“HOLD BP ACCOUNTABLE!!!!”(EPA-HQ-OAR-2009-0923-3557-1)

Comment:

“As far as I'm concerned, the entire fossil fuel industry is a similarly slow but much greater pollution disaster destroying my city. This recent event in the Gulf is not at all unusual in a generic sense.

For once in my life we have a president who has the political leaning and should have the political will AND OPPORTUNITY to really put a stop to the local and global disaster of fossil fuel use. Please take any and all steps to stop and/or slow down the entire fossil fuel industry.”(EPA-HQ-OAR-2009-0923-2577-1)

Comment:

“We must hold the oil and gas industry accountable. We are seeing daily reports and videos of the tragic damages caused when it is not held accountable. It is our air, water and land that they are polluting with tragic consequences for all--people plants, animals, jobs, health, our children's future. We must know how much pollution and where and in what form before we can rein it in. Last year, the industry successfully fought the mandatory reporting of greenhouse gases. That must not happen this year. Tthe EPA is proposing to include both the offshore and onshore oil and gas industry in the reporting system. We must ensure that the system accurately measures the pollution from the oil and gas industry. This improvement in reporting must happen quickly. The current BP spill is dramatic and highly visible. Long term damage from ongoing pollution is not so visible, but it is just as insidious.”(EPA-HQ-OAR-2009-0923-2779-1)

Comment:

“The BP oil spill is more evidence that the oil and gas industry cannot be trusted to be environmentally responsible or even to follow laws and regulations. And the results have been disastrous, both to our environment and to our economy.

It is therefore imperative that the EPA include both the offshore and the onshore oil and gas

industry in its system of mandatory reporting on greenhouse gas emissions (and any other regulations the EPA determines necessary to achieve its goals).

Please ensure that clear and firm rules are set so that the oil and gas industry cannot circumvent providing the measurement information needed to help the EPA set measures to curb greenhouse gases.”(EPA-HQ-OAR-2009-0923-1384-1)

Comment:

“We are devastated by the seemingly unstoppable flood of BP oil into the Gulf. The impact of industry carelessness and wishful thinking on our southern coastline, its fragile ecosystems, fisheries and citizens is tragic.

It is our understanding that the EPA is revisiting the need to require mandatory tracking and reporting by the gas & oil industries of their dangerous, polluting emissions. Please do not allow yourselves to be again bullied (aka lobbied) out of including these industries (both of-shore and on-) under your rules of oversight.

We strongly urge the EPA to hurriedly adopt a stringent regulation industry-wide system requiring impeccable and direct pollution measurements and reporting. Clearly these industries must be managed and held accountable for ALL their pollutions--inclusive of green house gas emissions into the atmosphere.”(EPA-HQ-OAR-2009-0923-3507-1)

Comment:

“Not to put pressure on you or anything, but . . . all of life of Earth is depending on you to DO THE RIGHT THING. You know what needs to be done; now you just have to find the resources within to do it.”(EPA-HQ-OAR-2009-0923-2342-1)

Comment:

“BP gives us now a good example of how Big Oil is unaccountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas-reporting rule. This year, the EPA is proposing to set things right and finally include the oil and gas industry in the system. I strongly support that decision and urge you to ensure that the system uses accurate, direct pollution measurements.”(EPA-HQ-OAR-2009-0923-3276-1)

Comment:

“The BP disaster in the Gulf of Mexico is enough data to support better regulation of oil and gas drilling.

Please make it so.”(EPA-HQ-OAR-2009-0923-3004-1)

Comment:

“BP and other companies that attempt or propose to explore for oil in the deep ocean must have a rock solid plan for spill containment and other disasters, as is now happening in the Gulf of Mexico.

Apparently BP had no "Plan B" for rapid containment of spills or related emergencies. The only thing they apparently relied on was hope and prayers that nothing would go wrong. Well things did go terrible wrong and BP had no real plan of action to seal the leak.

Such incompetency must cease. The Minerals management Service must perform in depth environmental analysis on all deep water exploration activities prior to issuing any permits to drill.

There must be no waivers of environmental or other safety requirements.”(EPA-HQ-OAR-2009-0923-2429-1)

Comment:

“BP's actions in the Gulf simply typify how the oil and gas industry operates. That industry MUST be held accountable. EPA proposes to include oil and gas in its mandatory greenhouse gas reporting rule, a rule that would have tracked the industry's global warming pollution emissions.

I strongly support EPA on this issue. I urge you to ensure that the system uses rigorous direct pollution measurement and includes the industry's emissions in the reporting system.”(EPA-HQ-OAR-2009-0923-3340-1)

Comment:

“Please require the oil and gas industry to be part of the pollution emission reporting system. We always hear that "oil" is a dirty business." Let's be brave enough to see if this is true and if so, how true - so the country can properly address the issue.

We're all in this together. Let's act like it.” (EPA-HQ-OAR-2009-0923-2221-1)

Comment:

“I’m writing to you as a human being... a resident of this magnificent earth. And how frustrating - and frightening -- to know that the earth on which we rely for our very lives is being polluted and slowly killed. What will we do when we realize we've finally reached the point beyond which there is no return. I understand that is a strong statement, but just how much can we pollute our air, land, fresh water lakes and streams, and oceans before we are unable to correct the damage we've done?”

The BP oil disaster should be a wake-up call and an urgent reminder of the need for committed and aggressive alternative and renewable energy resource development.

Under no circumstances should any similar drilling permits be issued or allowed to proceed (if already issued) until: 1) a thorough independent investigation into the cause of this devastating event is performed; 2) an independent inspection of all existing wells and rigs is performed; and until the industry can demonstrate exactly how they would be able to successfully stop a leak should (God forbid!) a similar event take place in the future.”(EPA-HQ-OAR-2009-0923-2186-1)

Comment:

“I strongly support the decision to set things right and finally include the offshore and onshore oil and gas industry in the reporting system as soon as possible.”(EPA-HQ-OAR-2009-0923-2414-1)

Comment:

“The oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive emissions. This year, the EPA can set things right and include the oil and gas industry in the system. I support that decision. I urge you to ensure that the system uses rigorous and direct pollution measurements and that the industry's emissions are included in the reporting system soon.”(EPA-HQ-OAR-2009-0923-2486-1)

Comment:

“The EPA's proposal to include the offshore -- and onshore -- oil and gas industry in the system is RIGHT. Please oppose any expansion of offshore drilling and limiting oil company liability for spills and focus on clean energy instead. They need to pay their own bills.

Sen. Murkowski's amendment and other such proposals mean even LESS regulation for companies like BP and Transocean. We're already paying for fat-cat bankers to have bonuses, for

politicians to have excellent healthcare policies while the rest of the country is held to a different standard, and now the idea of us taxpayers paying for oil corps' cleanups is CRAZY and immoral. This is not capitalism; it's not free market; it's corporate socialism and corporate welfare. It's cheating, and it's infuriating.

It's time to build a clean-energy economy that means more jobs, less pollution and real energy independence -- thus getting us out of costly WARS.

We look forward to your reply and plan of action to not stick us taxpayers again with a corporate bill. BP -- you broke it, you bought it. Sadly, because of this disaster, we are all going to pay with our own lives (the loss of life from animals and our own species).”(EPA-HQ-OAR-2009-0923-2976-1)

Comment:

“It is not exactly rocket science that oil corporations should pay for their own mistakes/spills/problems. They will not own up to their terrible, irretrievable, irreparable error here -- and are not fixing it immediately. We must make an impact for ALL corporations, and we taxpayers are tired of a Congress -- and particularly "conservative" "anti-welfare" Republicans -- voting for us to pay the bill that Corporations successfully "outsource" from their own billing dockets. Do not give them a free pass. This will not only help right now with the US economy (do NOT put more debt on us taxpayers), but will send a message to all corporations that they will pay the piper if they don't act responsibly.”(EPA-HQ-OAR-2009-0923-3061-1)

Comment:

“The oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule. This year the EPA is proposing to include the offshore and onshore oil and gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-2705-1)

Comment:

“If it shows nothing else, the Deepwater Horizon disaster shows that there are no easy ways to seal an oil well at this depth, and all the information released so far show that BP was flat out lying when it told MMS that there was a disaster response already planned out and ready to go. it also shows how irresponsible the industry and the government have been in advancing new methods to deal with type of event. thirty some years ago the exact same thing happened in Mexico, but in only 200 feet of water, and it took many months to plug that well. the technology used now is exactly the same as it was thirty years ago. nothing new in thirty years.

They have the same kind of track record on air pollution/global warming, no research, despite

billions and billions of \$\$'s in record profits. all they are doing is spinning the lie that BP is a green corporation in a green industry. nothing could farther from the truth this year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.”(EPA-HQ-OAR-2009-0923-3326-1)

Comment:

“Even as we watch the daily murder of the Gulf of Mexico and the human and wild life that are intricately tied to that body of water, more exploration is taking place in dangerous costal waters, without ANY oversight or ANY regulation. This has to stop TODAY. I hear all the talking heads and PR stooges blather about how it's all so safe, and know that as I watch the "live feed" from the undersea gusher, there is no scale attached to the image, so no true way to measure the escaping oil. The citizens of the United States are being lied to every minute. And no one, not one single person connected with the three companies involved in this brutal attack on my country, is being held responsible. At the very least, ALL offshore exploration must be hated immediately, regardless of the financial losses. And ALL regulations of existing wells MUST be enforced. NOW. Before another disaster, no matter how large or small, occurs. The "status quo" has now murdered another 11 human beings and will continue to murder until my government steps up to stop them. BP, Exxon, Chevron, Shell and every other oil company must begin ethical and responsible behavior starting TODAY.”(EPA-HQ-OAR-2009-0923-2775-1)

Comment:

“I don't mind paying higher prices for energy if it's clean/safe energy! And, yes, I live on a very tight budget already. Please take away the power of the mega corporations with their deep pockets and put it where it belongs - with the agencies charged with representing citizens who can't afford to bribe you!” (EPA-HQ-OAR-2009-0923-2609-1)

Comment:

“Dear Administrator Jackson,

I know you have heard this message from many others and it is true...it is time to hold people accountable. This oil mess could have been prevented if NEPA had been followed. NEPA was passed in 1969 and signed into law in 1970 for a very good reason. Companies cannot be trusted to do the "right thing" It is time to help them do the "right thing" by closing all loopholes and following the rules that were put in place many, many years ago.”(EPA-HQ-OAR-2009-0923-3551-1)

Comment:

“Please ensure that the oil and gas industry is required to participate in the mandatory greenhouse gas reporting rule to track their pollution emissions, and hold them accountable not only when things like the BP disaster happen, but also before these problems arise.”(EPA-HQ-OAR-2009-0923-1888-1)

Comment:

“Yes BP cut corners, and caused the most devastating spill in U.S. History, if not the worlds. Yes, they should be punished.. But let's look at it another way, it's time to employ our renewable and clean energy alternatives, plenty of them are out there and by cutting our subsidies to inept and dangerous companies like BP etc. We can bring about a new age of clean energy to the States and the World, now is the time.”(EPA-HQ-OAR-2009-0923-2249-1)

Comment:

“We need to learn from this current BP disaster - don't let the oil and gas industries lobby their way out of greenhouse gas reporting again. They did it last year, but now the EPA has a chance to right the wrong and track the massive global warming emissions from these industries. I urge you to make the pollution measurements strong and detailed and include the emissions from the oil and gas giants as soon as possible.”(EPA-HQ-OAR-2009-0923-2189-1)

Comment:

“Please, no more favors for big oil companies, or big corporations at all for that matter. They are ruining our country!! Our economy, our oil, and it seems like the only recourse we have are these little letters.”(EPA-HQ-OAR-2009-0923-1821-1)

Comment:

“I support the effort to include the oil and gas industry in the mandatory greenhouse gas reporting proposal.

They should not be excluded. We need to know the full impact of that industry on our planet, so we can be as fully informed as possible in determining what we can do to address the challenges presented by climate change.”(EPA-HQ-OAR-2009-0923-2900-1)

Comment:

“Please close the loophole that allows oil companies to avoid reporting green house gas emissions. Oil companies should be held accountable for their emissions under very strict reporting standards. I urge you to implement these rules as soon as possible.”(EPA-HQ-OAR-2009-0923-2898-1)

Comment:

“This oil spill will affect both the habitat and the economy of costal tourist areas (beaches) for years to come.”(EPA-HQ-OAR-2009-0923-3056-1)

Comment:

“Please: Ms. Administrator Jackson: "No more Offshore!"”(EPA-HQ-OAR-2009-0923-0799-1)

Comment:

“Global Warming is everyone's problem, and we need to honestly measure and monitor the release of all CO2 and other greenhouse gases in order to assess whether or not particular steps towards a solution are working.

The issue goes beyond any particular person, country or company, even a behemoth like BP. All sources of greenhouse gases must be tracked, specifically including the petroleum industry, in all of its phases (exploration, development, production, refining, transportation etc.) anywhere it operates.

Please make a decision to insist that the oil and gas industry be mandated to report all greenhouse gas emissions.”(EPA-HQ-OAR-2009-0923-1296-1)

Comment:

“Even as we watch the daily murder of the Gulf of Mexico and the human and wild life that are intricately tied to that body of water, more exploration is taking place in dangerous costal waters, without ANY oversight or ANY regulation. This has to stop TODAY. I hear all the talking heads and PR stooges blather about how it's all so safe, and know that as I watch the "live feed" from the undersea gusher, there is no scale attached to the image, so no true way to measure the escaping oil. The citizens of the United States are being lied to every minute. And no one, not one single person connected with the three companies involved in this brutal attack on my country, is being held responsible. At the very least, ALL offshore exploration must be hated immediately, regardless of the financial losses. And ALL regulations of existing wells MUST be enforced. NOW. Before another disaster, no matter how large or small, occurs. The "status quo" has now murdered another 11 human beings and will continue to murder until my government steps up to stop them. BP, Exxon, Chevron, Shell and every other oil company must begin ethical and responsible behavior starting TODAY.”(EPA-HQ-OAR-2009-0923-0721-1)

Comment:

“It is time to hold BP, as well as other oil and gas industries accountable. I support closing the loopholes that the oil and gas industries have utilized. We must have mandatory greenhouse gas reporting which includes the onshore & offshore gas and oil industry. Thank you for your consideration.” (EPA-HQ-OAR-2009-0923-1393-1)

Comment:

“IN THIS MOMENT - AS WE WATCH HELPLESSLY IN DESPAIR & DISBELIEF - THE HORRIFIC UNFOLDING OF AN UNCONTROLLABLE DISASTER - THE EPA MUST, MUST ACT RESPONSIBLY. THE EPA CANNOT LET OIL COMPANIES SET THE RULES! THE OIL COMPANIES ACT ONLY IN THEIR OWN INTERESTS. THOSE INTERESTS ARE IN DIRECT CONFLICT WITH SUSTAINABLE LIFE ON THIS PLANET. YOU, AS THE ENVIRONMENTAL PROTECTION AGENCY, NEED TO DO EXACTLY THAT - PROTECT THROUGH COMPLETE, TOTAL, TRANSPARENT, VERIFIABLE ACCOUNTABILITY.” (EPA-HQ-OAR-2009-0923-0701-1)

Comment:

“Hold all corporations accountable! Put a stop to the cozy relationship between regulators and perpetrators of "for-profit" entities! They are guilty of negligent homicide.

Massey in West Virginia murdered 29 men. BP in the Gulf of Mexico murdered 11 men. Send the CEO's to prison, where they belong.” (EPA-HQ-OAR-2009-0923-1453-1)

Comment:

“Last year, the oil and gas industry exempted itself from the mandatory greenhouse gas reporting rule, as if hiding its harm would make it go away. This year, the EPA is proposing to finally make sure that both offshore and onshore drilling are to report their emissions. This should indeed be mandatory and enforced by law.

The horrible BP disaster in the Gulf shows, without a shadow of a doubt, that the oil and gas industry HAS TO be held accountable for how they affect our environment, and thus, all of us. Please make sure that the system uses direct pollution measurements, detailed and accurate, and that the industry's emissions are included in the reporting system as soon as possible.

Technology and oil profits are worthless when countless living things, humans included, are at stake.” (EPA-HQ-OAR-2009-0923-1140-1)

Comment:

“The offshore gas and oil should be accountable in the greenhouse emission count. The interest of the citizens should be primary to the tremendous money clout of the oil industry. Be there for us.

Kathleen Mulligan” (EPA-HQ-OAR-2009-0923-1432-1)

Comment:

“If we've learned anything from the BP disaster, it's: "The oil and gas industry must be closely watched and held accountable for the environmental damage it causes."

Last year, the industry finagled its way out of the mandatory greenhouse gas reporting rule. This year, the EPA is proposing to set things right and include the oil and gas industry in the system. I strongly support that decision.

I urge you to ensure that the system uses rigorous, direct pollution measurements and that the petroleum industry's emissions are included.”(EPA-HQ-OAR-2009-0923-1627 -1)

Comment:

I strongly support the EPA in their effort to require the oil and gas industry to report all pollution emissions in a direct, detailed, immediate form.” (EPA-HQ-OAR-2009-0923-0762-1)

Comment:

“This is the era of transparency. The citizens of the world insist on knowing the true costs of drilling oil and gas. Let's close the loop hole that hides the industries greenhouse gas emissions.”(EPA-HQ-OAR-2009-0923-0952-1)

Comment:

“It is time to include offshore oil and gas along with onshore in our measurements of industry emissions. This industry can no longer be granted any loopholes like the one that enabled it to escape from mandatory greenhouse gas reporting.” (EPA-HQ-OAR-2009-0923-1182-1)

Comment:

“The oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.”(EPA-HQ-OAR-2009-0923-0902-1)

Comment:

We appreciate your efforts in the BP oil disaster, but I hope you begin exercising some muscle to stop BP from using toxic dispersants, which are only intended to cover up their mistake. Those dispersants are likely to be much more toxic to the ocean than the oil, and will make it tough to clean up the oil because it makes it less visible. Most of us know a self-serving action when we see it.

Please institute any all legal efforts to stop BP from exacerbating the growing problem.”(EPA-HQ-OAR-2009-0923-0906-1)

Comment:

“ENOUGH of allowing these mega-billion dollar corporations to pillage and destroy the world we ALL inhabit. And this isn't even to mention the earth we're passing onto our grandchildren and great grandchildren. The immunity of the gas and oil corporations is abominable. Time for the game to be up, and to serve all the little people who are the ones who really keep this country afloat.” (EPA-HQ-OAR-2009-0923-0910-1)

Comment:

“The gas and oil industry must be held accountable. There has been great corruption in the practice of allowing industry lobbyists to influence our supposed protection agencies. This can no longer be permitted.”(EPA-HQ-OAR-2009-0923-1158-1)

Comment:

“As a nation, we have not done enough rigorous thinking about fossil fuel energy, CO2 emissions, the accumulation of atmospheric CO2, rising temperatures, and damaging climate change.

What we sense is that rising temperatures will be proportionate to accumulating CO2. What we fail to realize is that climate change behaves very differently from temperature change. A small change in temperature can trigger a dangerous qualitative shift in how climate behaves. Climates once friendly to agriculture can turn into climates where agriculture is nearly impossible. Temperatures once low enough to preserve the ice sheets on Greenland and West Antarctica can rise to a point where those ice sheets will no longer survive.

Because we haven't thought this through, we don't realize how much extra climate danger we create by being careless about total CO2 emissions.

I urge you to include offshore oil in the CO2 emission reporting requirements that EPA supervises.

And I urge you to speak out for the necessity to create a post-fossil fuel energy economy in the U.S. at the soonest feasible date. Dangerous climate change won't come to an end till temperature change ends; temperature change won't end till emissions stop; emissions won't stop till we have a post-fossil fuel, clean energy economy.”(EPA-HQ-OAR-2009-0923-1187-1)

Comment:

“It is high time for the government to make sure this reporting system includes offshore and onshore oil and gas in the system, now! Please, we need and deserve this information! thank you.”(EPA-HQ-OAR-2009-0923-0953-1)

Comment:

“Our quasi-capitalism would suggest that we understand the full cost for every product we consume. How much is each gallon of gasoline when we add the cost of this eco-disaster? This, on top of the cost of our invading a sovereign nation that possessed the oil we demanded. It makes the cost of clean and renewable energy sources a true value.”(EPA-HQ-OAR-2009-0923-1165-1)

Comment:

“JAIL THE BASTARDS OF BP,,, IN FACT THE ONE CASE WHERE THIS LIBERAL IS OK WITH THE DEATH PENALTY, IS IN THE CASE OF CORPORATE OR GOVERNMENT OFFICIALS HAVE MADE DECISIONS THAT THEY KNOW WILL KILL PEOPLE, BUT THAT WILL MAKE PROFIT”(EPA-HQ-OAR-2009-0923-0996-1)

Comment:

“The oil and gas industry has a powerful hold on us. We can break free of that hold by releasing with held information that our government has about "FREE ENERGY"! YES- the technology has been with held from us so that we will be dependent on oil. Let's break the chains of this dependence.”(EPA-HQ-OAR-2009-0923-0868-1)

Comment:

“Please change the laws to make Big Oil accountable for pollution and negligence. The BP oil disaster is just the reminder we need that if we ruin the ocean, we destroy ourselves. Please change now before it is too late.”(EPA-HQ-OAR-2009-0923-0849-1)

Comment:

“Stop Big Oil. Who Killed the Electric Car?????????????” (EPA-HQ-OAR-2009-0923-3260-1)

Comment:

“Privatize BP” (EPA-HQ-OAR-2009-0923-0883-1)

Comment:

The oil and gas corporations must take responsibility for their tragic, conscious assaults on America's precious natural resources. The gulf oil spill was not an accident. BP was cutting safety measures to increase profits.

After 20 years, we have not received full payment for the clean-up from the Exxon-Valdez spill. The marine ecosystem of the area still suffers!

BP has resisted the United States government calls for full payment for the damage. Just the loss of commerce and jobs resulting from the spill should cost BP billions \$\$\$\$\$. The government must DEMAND that it is paid.

Why has the EPA not stopped BP from spreading dispersants? The chemicals are very toxic and are killing our fish and wildlife. The dispersants are ineffective. They are a ruse. BP uses them to try to show the American public that BP cares and is trying to right their wrong doings.

The top management of BP (especially the CEO) must be charged by the Justice Department and face those charges in an American court of law. Any American citizen that knowingly did what BP has done would be charged with a felony.

Just because BP is one of the largest corporations in the world, is no reason for the US government to look the other way when they violate the law.

Hundreds of millions American citizens expect more from their government.

Instead of changing US law to reduce the regulatory oversight of big oil, the EPA MUST strengthen the monitoring and write more stringent rules. Each violation of safety rules MUST cost these corporations dearly. The US government must shut down all operations on American soil and in American waters when a violation of safety regulations is found and it is proven that the corporation was aware of the violation.”(EPA-HQ-OAR-2009-0923-0668-1)

Comment:

“Please stop kicking the can down the road. Act with wisdom, human decency and responsibility for the benefit of ALL sentient beings.”(EPA-HQ-OAR-2009-0923-0878-1)

Comment:

“Just clean up the mess, and send them the bill later.”(EPA-HQ-OAR-2009-0923-0829-1)

Comment:

“Without proper reporting and so information, we can't even fully assess the problem much less strategize solutions. Thank you for working to close the loop hole that allows oil and gas companies to not report greenhouse emissions (what a terrible breach of proper reporting and accountability that was). Our welfare depends on your excellent service in the public interest now.

Thank you for your keenest effort now to protect our welfare and the the welfare and security of future generations.”(EPA-HQ-OAR-2009-0923-3556-1)

Comment:

“This in regard to the EPA including the oil and gas industry in pollution accounting and reporting. I strongly support that decision.”(EPA-HQ-OAR-2009-0923-3563-1)

Comment:

“Hold BP accountable, even if it results in closing them down from operating in the US. Please do not authorize the four uranium mine leases on the Navajo Reservation. And put all of our dollars into renewable and sustainable energy.”(EPA-HQ-OAR-2009-0923-3466-1)

Comment:

“Hold Big Oil and Big Gas accountable!”(EPA-HQ-OAR-2009-0923-0749-1)

Comment:

“I strongly support the decision to include offshore and onshore oil and gas industry in the mandatory greenhouse gas reporting rule. All sources need to be accounted for if we are to address the very serious global warming problem. We are working very hard at the grassroots

level to do our part, but our efforts will be for not if the really big contributors are not held accountable to address their emissions.

Please do all you can to ensure the oil and gas industry is held accountable for their greenhouse gas emissions.”(EPA-HQ-OAR-2009-0923-3550-1)

Comment:

“PLEASE DON'T ALLOW BP, OR ANY OTHER OIL COMPANIES, TO DICTATE OR TO HIDE THEIR FAILURES PRIOR TO PUBLIC INVESTIGATION.

Yes, we need oil currently but we cannot pay for it today by ransoming our future. You know that the oil industry will try to buy its way out of legislation that it perceives as blocking its efforts. Don't let them succeed as they so often do.

They have a goal of profit, only, no matter the expense to the taxpayer. You are a taxpayer too. And will you allow your children to pay for your mistake of letting BP, or any other of the many oil mongers out there, to hide information from public scrutiny?

That's exactly what Big Oil wants to do today. They will use a current loophole in the law to hide its pollution just as it did in 2009 when it lobbied its way out of mandatory greenhouse gas reporting.

NO MORE EXEMPTIONS FOR BIG OIL.

As a consumer you can add my name to your growing list of people who will back the EPA and you to the hilt.

Thanks for listening. Now go out there and pass that legislation. Remember, you now have me, us, the public-at-large, watching and listening as we line up in support of common sense.” (EPA-HQ-OAR-2009-0923-3561-1)

Comment:

“I'm all for having mandatory greenhouse gas reporting rule by the oil and gas industry. Americans need to be aware the massive global warming pollution associated by emissions its products, think fossil fuels. So, stick with your proposal to require such reporting, including those from their offshore operations!”(EPA-HQ-OAR-2009-0923-3418-1)

Comment:

“Strive for justice!” (EPA-HQ-OAR-2009-0923-1003-1)

Comment:

“Strive for justice!”(EPA-HQ-OAR-2009-0923-0725-1)

Comment:

“Please include the offshore and onshore oil and gas industry in pollution emissions including greenhouse gasses.”(EPA-HQ-OAR-2009-0923-0516-1)

Comment:

“The grim, ongoing BP catastrophe in the Gulf makes it imperative that the oil and gas industry be held accountable for the human and environmental havoc their activities can wreak. Last year, the industry evaded the mandatory greenhouse gas reporting rule through extensive lobbying that kept the public in the dark about their emissions. The rule would have tracked the industry's massive global warming pollution.

The EPA now proposes to include the offshore and onshore oil and gas industry in the measuring and reporting system. I support this crucial decision. Please make sure that the system includes industry emissions in the reporting system, using direct and detailed pollution measurements, as soon as possible.”(EPA-HQ-OAR-2009-0923-0414-1)

Comment:

“It is good news that the EPA is planning to hold the oil and gas industry accountable, onshore and off. Their complicity with the Minerals Management Service has been disgusting, and the devastation speaks for itself. For the future's sake, time to act!” (EPA-HQ-OAR-2009-0923-0214-1)

Comment:

“I think it's time to try something different regarding the oil and gas industries: instead of listening to lobbyists, listen to scientists and environmental experts in your own organization when making decisions that will affect our environment forever.” (EPA-HQ-OAR-2009-0923-0362-1)

Comment:

“The Exxon V. and recent BP oil disasters point to a huge wrong being perpetrated on American citizens and small businesses. The wrong is in the caps that have been placed on industry payments and liabilities without proper review and approval by federal agencies. Given: 1.) the

horrendous consequences being revealed daily in the BP incident; and 2.) the corrupt, even salacious relationship now evident between government agencies and corporate entities; it is now painfully obvious that the entire regulatory structure must be thoroughly reviewed and revised to meet the requirements of a safe, environmentally sound program of qualification, regulation and comprehensive compensation.

It is fundamentally unfair and should be made a criminal offense to practice "cost externalization" at the expense of an unsuspecting, intentionally miss-informed citizenry. That practice must be terminated -along with those who make a living by inflicting externalized costs of doing business on the rest of us. All losses and damages suffered by small businesses and private citizens must be fairly and promptly compensated.

This is one more glaring example of why our elections must be 100% publicly funded. We must no longer tolerate the costs of corporate entities buying and subsidizing our elected officials and the kind of legislation that serves us ill at every turn.

We The People demand the strongest possible legislation to protect us and our environment from destructive mineral extraction and to ensure our well-being and prosperity now, and for future generations!" (EPA-HQ-OAR-2009-0923-0327-1)

Comment:

"The way oil executives [and, at times, those who work in the Environmental Protection Agency act, one would think they, their children and their grandchildren do not inhabit the same planet the rest of us do." (EPA-HQ-OAR-2009-0923-0147-1)

Comment:

"Please hold the oil and gas industry responsible for all the environmental damage that it causes by closing the legal loopholes and not allowing more to happen. The EPA is the only hope for the individual voter ." (EPA-HQ-OAR-2009-0923-0165-1)

Comment:

"Dear Administrator Jackson,

At this point, why don't we all focus our efforts on getting the leak in the Gulf stopped? Once we have addressed that serious problem, then we can work on the extensive clean-up to follow. All along the way, we all need to take a good, hard look at the oil industry, and what can be done to make drilling for oil completely safe for all life on this planet, even if that means ending drilling altogether."(EPA-HQ-OAR-2009-0923-0164-1)

Comment:

“I support EPA's proposal to require reporting of greenhouse-gas emissions from the offshore and onshore oil and gas industry” (EPA-HQ-OAR-2009-0923-0233-1)

Comment:

“The latest disaster in the Gulf of Mexico has made very clear that we need strong oversight of the fossil fuel industries as well as a shift towards cleaner sources of energy. I am continually disappointed to hear about the massive lobbying efforts that result in laws that suit the big corporations at the expense of the citizens and our environment. I strongly urge the EPA to continue on its track of requiring the industry to submit mandatory greenhouse gas reporting and hope that you also include the other pollution byproducts produced.”(EPA-HQ-OAR-2009-0923-0101-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.”(EPA-HQ-OAR-2009-0923-0067-1)

Comment:

“Piece by piece we destroy the earth. At this very moment a very large piece is being devastated. It is insane to allow this to continue” (EPA-HQ-OAR-2009-0923-0071-1)

Comment:

“Please protect our world. I think that is in your job description. We count on you to take a stand.” (EPA-HQ-OAR-2009-0923-0072-1)

Comment:

“Develop inexpensive cars that run on fuels other than oil based products” (EPA-HQ-OAR-2009-0923-0073-1)

Comment:

“I am hoping that we have learned a lesson from this horrific catastrophe - even BP now admits that it is a catastrophe” (EPA-HQ-OAR-2009-0923-0074-1)

Comment:

“It sickens me that gas and oil companies continue to make huge profits while OUR environment is destroyed. It is time to invest in clean, renewable energy” (EPA-HQ-OAR-2009-0923-0075-1)

Comment:

“If we have learned anything watching the the outrageous HORRIFYING BP disaster, ARISING FROM FRAUD, INCOMPETENCE, and CORRUPTION, both on the part of BP and the Bush/Cheney destroyed and corrupt MMS, unfolding in the Gulf, it's that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-0076-1)

Comment:

“The need for balance has never been greater. Your role in finding it is critical” (EPA-HQ-OAR-2009-0923-0077-1)

Comment:

“This is horrible! The oil companies have been basically running the country for a decade now, and it seems it won't stop until they've destroyed it.” (EPA-HQ-OAR-2009-0923-0078-1)

Comment:

“The oil spill in the gulf has been a disaster, we must do all we can to ensure this does not happen again” (EPA-HQ-OAR-2009-0923-0079-1)

Comment:

“The uncontrolled exploration of declining resources has driven corporations into extreme measures for obtaining greater wealth. They have lost their values over the greed for money and this will bring about our earths destruction. One cannot sit quietly and wait for these individuals to see the light” (EPA-HQ-OAR-2009-0923-0080-1)

Comment:

“Greed and irresponsibility will surely end civilization as we know it” (EPA-HQ-OAR-2009-0923-0081-1)

Comment:

“It's time for Big Business to develop some sort of moral and ethical compass, backed up by law” (EPA-HQ-OAR-2009-0923-0082-1)

Comment:

“I've watched the promise-and-spill cycle of the Oil Industry ever since I was a child and I'm frustrated and angry that we let this cycle keep repeating itself generation after generation” (EPA-HQ-OAR-2009-0923-0083-1)

Comment:

“These steps are just stop-gaps, however, and the real solution is to press ahead toward truly renewable energy sources starting NOW. Set energy independence as a target just like making it to the moon was years ago. Achieving this goal won't happen overnight and we simply can't wait until another oil disaster occurs, or until we've wrung out the last of the oil available to us” (EPA-HQ-OAR-2009-0923-0083-2)

Comment:

“You must know that Americans are outraged and frustrated by this enormous oil disaster and want much, much stronger restrictions and accounting requirements on oil companies! Please respond by enacting them--we await your response!” (EPA-HQ-OAR-2009-0923-0084-1)

Comment:

“The time has come for the public to stand up against all the giants! The time for looking the other way is over!” (EPA-HQ-OAR-2009-0923-0085-1)

Comment:

“The EPA's function is to protect the environment. Do your job!” (EPA-HQ-OAR-2009-0923-0087-1)

Comment:

“Por favor, dejen ya de llenar sus arcas con el oro negro. Su vanidad y ansias de poder estan acabando con la humanidad y con todo su entorno. Acabaron con los arboles, contaminaron el agua, secaron la tierra.

BASTA YA. DEJEN DE DESTRUIR. COMPARTAN DE LO QUE TIENEN, QUE TANTOLES SOBRA. NO SEAN TAN CODICIOSOS, ACASO SON CIEGOS QUE NO QUIEREN VER. SON MALOS ADMINISTRADORES DE LO QUE DIOS NOS DIO. SON EGOISTAS, SIUSTEDES, LOS RICOS Y PODEROSOS. DIOS LOS PERDONE” (EPA-HQ-OAR-2009-0923-0088-1)

Comment:

“Continuing the failed regulatory policies - or the lack there of - of past administrations is NOT the Change that I voted for!” (EPA-HQ-OAR-2009-0923-0089-1)

Comment:

“This MUST be done NOW!!! Enough is enough! I want action for the earth and the environment, and I am demanding it NOW, as a citizen and a voter! I want clean energy and I want the government and policymakers to take saving the planet we all share seriously, once and for all!!!

Do the right thing!!! It must be done!!!” (EPA-HQ-OAR-2009-0923-0090-1)

Comment:

“We need to make efforts to develop energy alternatives that are safe for the environment which will all live. In the meantime, those who have benefited GREATLY from our dependence on oil need to be responsible for its production.

Please do the right thing and begin to make a difference. We can change the world for the better one step at a time” (EPA-HQ-OAR-2009-0923-0091-1)

Comment:

“NO MORE EXCEPTIONS on GREENHOUSE GAS REPORTING. I DON" T CARE WHO YOU ARE” (EPA-HQ-OAR-2009-0923-0092-1)

Comment:

“I am concerned about Congress's history of giving the costs of risks to the taxpayer. Even Congress people who talk about reducing government spending will then vote to reduce the liability of big oil companies. This is nothing more than socialism of the costs. They want taxpayers to pay for cleanups and pay for subsidies while the big oil companies reap huge profits” (EPA-HQ-OAR-2009-0923-0093-1)

Comment:

“Clearly, the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-0094-1)

Comment:

“Big oil has gotten away with way too much for way too long. They have been irresponsible about the environment--the only one we have--while raking in absolutely obscene profits for these many years.

Hold them accountable!!” (EPA-HQ-OAR-2009-0923-0095-1)

Comment:

“We need very strict regulations and enforcement. Then fines and jail terms if necessary. Living things before inanimate corporations and their stupid, greedy leaders” (EPA-HQ-OAR-2009-0923-0096-1)

Comment:

“It is time for the oil and gas industry to become a part of greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-0097-1)

Comment:

“It's about time that our legislators stop playing money games with the gas and oil industry and fight for the American public!!” (EPA-HQ-OAR-2009-0923-0098-1)

Comment:

“As someone who worked as a Senior Financial Analyst in the Oil Industry and a long-time Mineral Rights owner I feel there is no incentive for the oil industry to spend even one dime on protecting people or the environment.” (EPA-HQ-OAR-2009-0923-0099 -1)

Comment:

“We must cut down on CO2 emissions! Please help!” (EPA-HQ-OAR-2009-0923-0100-2)

Comment:

“I strongly urge the EPA to continue on its track of requiring the industry to submit mandatory greenhouse gas reporting and hope that you also include the other pollution by-products produced.” (EPA-HQ-OAR-2009-0923-0101-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-0103-1)

Comment:

“You made the choice to drill, now you pay for it. No bailout.” (EPA-HQ-OAR-2009-0923-0104-1)

Comment:

“Pollution of all types from the oil and gas industry must stop” (EPA-HQ-OAR-2009-0923-0105-1)

Comment:

“Let's not make JUST the oil and gas INDUSTRY responsible in general, but also the particular companies who are only too ready to take full credit and PROFITS when things go well also stand the FULL LOSSES when things go awry. BP, take this one like a man!” (EPA-HQ-OAR-2009-0923-0106-1)

Comment:

“I am really sotired of subsidies to companies who make profits, and no real oversights to what they are doing. This disaster is not the first, but the biggest” (EPA-HQ-OAR-2009-0923-0107-1)

Comment:

“I also ask that the EPA require that all currently functioning offshore oil rigs be fitted with a remote-control off switch to shut down the flow of oil in a dire situation such as the disaster in the Gulf. It is my understanding that this technology is currently available at the cost of

approximately \$500,000 per rig, and that oil companies simply opted to avoid this extra cost. The EPA must require that oil companies include all safety features in existence in all oil rigs” (EPA-HQ-OAR-2009-0923-0108-1)

Comment:

“This is just the start - BP isn't alone and Deep Horizons isn't the only one. Please act now!” (EPA-HQ-OAR-2009-0923-0109-1)

Comment:

“Please protect our world. I think that is in your job description. We count on you to take a stand.” (EPA-HQ-OAR-2009-0923-0110-1)

Comment:

“We have been reaping the benefits and deceiving ourselves about the costs of fossil fuels for a long time now. A shamefully long time. It is time to grow up and demand an honest accounting. The simplest and best form this could take would be to:

1. Write the precautionary principle into law.
2. To put the legal burden of proof on industry and finance to prove safety rather than on individuals and the communities to prove danger” (EPA-HQ-OAR-2009-0923-0111-1)

Comment:

“This is another clean up for your administration. You have a lot of support because people realize that you did not create this mess. Be loud and aggressive about your efforts--that is what people want to hear.

Go after Limbaugh and Beck every time they open up their mouths with their insane stupidity--they are making making millions off your silence and sucking in the naive citizens. If enough people complain about their attempts to derail our government, may they will be fired.

Rachel Maddow is doing a phenomenal reserach and reporting job of keeping us informed about the corruption in the industries. We need more people like her and the staff of MSNBC” (EPA-HQ-OAR-2009-0923-0112-1)

Comment:

“Don't let the oil and gas industry run this country. Don't let the oil and gas industry ruin this country or any country” (EPA-HQ-OAR-2009-0923-0113-1)

Comment:

“Please do the right thing for our country. We have, and continue to be held hostage by the big oil people. It is time for a complete change in the way we use and produce energy!” (EPA-HQ-OAR-2009-0923-0114-1)

Comment:

“As the world watches the Gulf of Mexico BP disaster continuing to increase in magnitude, clearly the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-0115-1)

Comment:

“It's time for the oil/gas industry to come clean....in many ways. Let's get on the case and close the loopholes and dishonesty.....NOW!” (EPA-HQ-OAR-2009-0923-0117-1)

Comment:

“To be accountable will probably cost them money. But rather than charging the consumer more they need to cut their own profits and absorb the loss. The top echelon of the industry should be the ones who sacrifice. Enough of the attitude that the working middle class will pay to clean up their mistakes and oversites due to insufficient reporting of the way things really are in the industry.” (EPA-HQ-OAR-2009-0923-0118-1)

Comment:

“Please do not let any legislation be watered down. This makes us feel (and know) that you are all looking out for your own interests, not the public good” (EPA-HQ-OAR-2009-0923-0119-1)

Comment:

“There couldn't be a more critical or opportune moment for the health and life of our planet and all who dwell on it. We're counting on you. Thank you in advance” (EPA-HQ-OAR-2009-0923-0120-1)

Comment:

“This is important to our environment as well as our children's children” (EPA-HQ-OAR-2009-0923-0121-1)

Comment:

“Finally, as willfully negligent murderers, BP, TransOcean & Halliburton, need to be held to full accountability under US law. Their inhumane & utterly corrupt abuse of the survivors; coercion, denial of medical treatment are further facts that demonstrate criminality. WE need full accountability for corrupt criminal corporations, BP, TransOcean, Halliburton and their criminal CEO's” (EPA-HQ-OAR-2009-0923-0122-1)

Comment:

“BP's history of noncompliance demands that they be barred from further government contracts and fined under the clean water act for every gallon of oil spilled. If they are bankrupted, so be it. Others will buy the assets and be more responsible” (EPA-HQ-OAR-2009-0923-0123-1)

Comment:

“This a no-brainer! As Americans along with our government not so long ago we sent men to the moon. What has happened to that spirit of sacrifice and bringing out the best in all of us. Let this be a new beginning as we end our dependence on the oil and gas industry! It's too late for the wildlife, environment and sea food industry for our Gulf coast region, let us hope it's not too late for America!” (EPA-HQ-OAR-2009-0923-0124-1)

Comment:

“BP has been lying about it's abilities to drill in deep water. They are capable of drilling, all right, just not capable of drilling safely, and totally incapable of plugging the hole they drilled when things go wrong as they inevitably do!” (EPA-HQ-OAR-2009-0923-0125-1)

Comment:

“Have some courage. Do the right thing NOW. It might already be too late” (EPA-HQ-OAR-2009-0923-0126-1)

Comment:

“My family requests that you consider tighter guidelines for all oil and mining operations in the United States” (EPA-HQ-OAR-2009-0923-0127-1)

Comment:

“Our shorelines, land and marine environments need stricter protections for the welfare of all living things.” (EPA-HQ-OAR-2009-0923-0127-2)

Comment:

“Strengthen the EPA to control big oil & others.” (EPA-HQ-OAR-2009-0923-0129-1)

Comment:

“OIL IS RUINING THE PLANET--EARTH, WATER & SKY.” (EPA-HQ-OAR-2009-0923-0131-1)

Comment:

“We here in the Florida Keys are especially vulnerable and our way of life is immensely threatened.” (EPA-HQ-OAR-2009-0923-0134-1)

Comment:

“Please don't let the oil and gas industry continue to get a free ride.” (EPA-HQ-OAR-2009-0923-0135-1)

Comment:

“We are a government of the people, by the people, and FOR the people, not of, by and for the corporations, please, act now, before it's too late.” (EPA-HQ-OAR-2009-0923-0136-1)

Comment:

“It is hard to believe that there were regulations put in place and yet BP was allowed locally and at Federal level to by pass them all. Shameon the American government! This all could have been avoided. Simply firing someone is not enough, take action and put the laws and regulations back in place.” (EPA-HQ-OAR-2009-0923-0137-1)

Comment:

“In the most recent disaster BP ignored safety issues as time was critical. Time means money, so profit was the over-riding concern. These companies have to realize that protective actions are more important than money. Look at what this disaster cot them.” (EPA-HQ-OAR-2009-0923-0138-1)

Comment:

“Let us look to the future with solar, wind, wave, etc energies. The time is now!!!” (EPA-HQ-OAR-2009-0923-0139-1)

Comment:

“If I cause a problem, I am responsible for admitting then fixing the problem. Why should we expect less of a corporation now that corporations have been given the rights of an individual?” (EPA-HQ-OAR-2009-0923-0140-1)

Comment:

“It's time to take charge of the country and the oil companies. They have had it too easy with since the Bush Chaney administration people letting them do anything they want for profits while ignoring the enviroment and the saftey of people.” (EPA-HQ-OAR-2009-0923-0141-1)

Comment:

“I do not want the government to lose one dime in the matter of cleaning up this mess. Before any company drills another drop a law should bemade that the govenment takes over the company involved in the spill and directs all operations reguardless of the cost to the company until it is resolved.” (EPA-HQ-OAR-2009-0923-0142-1)

Comment:

“Some thoughtful americans believe that if the amount of taxpayer wealth spent on the military protection of oil fields and subsidies of oil production, including outrageous tax benefits, were devoted to energy resources that are renewable (and not owned by the corporate monarchy) could forever free us of the grasp of these greedy oppressors. Our taxpayer wealth should be spent on the development of wind, solar and tide energy production. Those greedy and wealthy “free traders" have made us believe that we cannot develop these “green resources ". Just imagine where we would be now if we had listened to President Carter and Reagan hadn't torn the solar panels off theWhite House.

If the oil barons believe it's too costly to “do it right ' then, by all means, we must impose every regulatory measure available. We have ignored the greed and unconcern of the oil people far too long.” (EPA-HQ-OAR-2009-0923-0143-1)

Comment:

“This is long, long past due. Our new energy technology should be much more advanced by now. Continuing to hide the damage caused by current energy sources only tends to keep needed changes on the back burner.” (EPA-HQ-OAR-2009-0923-0144-1)

Comment:

“These irresponsible asses have bent and broken every rule and regulation they can to maximize their profit. This time they have raped the environment because of their filthy greed and lust for money.” (EPA-HQ-OAR-2009-0923-0145-1)

Comment:

“The way oil executives [and, at times, those who work in the Environmental Protection Agency] act, one would think they, their children and their grandchildren do not inhabit the same planet the rest of us do.” (EPA-HQ-OAR-2009-0923-0147-1)

Comment:

“I would also suggest that any technology with such catastrophic potential - especially nuclear power with its so far unsolved deadlywaste problems - not be given clearance for new units until unshakable proof of safety is presented. There may be some things which will always be planet threatening; don't permit them.” (EPA-HQ-OAR-2009-0923-0148-1)

Comment:

“Please do the right thing! Make these people responsible for this horrible disaster that would not have happened had it not been for their greed. Let's not ruin this planet completely.” (EPA-HQ-OAR-2009-0923-0149-1)

Comment:

“I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. Don't let them weasel out of reporting everything!” (EPA-HQ-OAR-2009-0923-0150-1)

Comment:

“Any benefits from these measurements will only be realized if all emitters of green house gases are accounted for. Please join me in support of holding big oil accountable for their actions.” (EPA-HQ-OAR-2009-0923-0151-1)

Comment:

“Also, each well should under go routine inspections by EPA for safety to prevent disasters.” (EPA-HQ-OAR-2009-0923-0152-1)

Comment:

“Lisa and I add that we feel very strongly much tougher environmental standards, vigorous enforcement (private and administrative), and rapid phase-out of fossil fuels.” (EPA-HQ-OAR-2009-0923-0153-1)

Comment:

“Not only should they be held accountable this way, BP should be jailed for its past actions against the people and all living things on this earth.” (EPA-HQ-OAR-2009-0923-0154-1)

Comment:

“Let the public decide who should get oil permits! We are all sick to death of being lied to. I don't believe BP will ever pay a dime for their disaster. They will follow the legal steps of Exxon who STILL HAS NOT PAID!!! and after dragging it out for years and cost the taxpayers millions of dollars they will declare bankruptcy or chapter 11 or anything to avoid their responsibility. The Gov is too entrenched with politics to protect the people. Give us a referendum and we will issue permits where needed. That means all wind, solar, biofuels, wave hydro and geo thermal get all the permists and incentives. What I give the oil company comes from my toilet. I couldn't hate a group of people more than them. Disgusting!” (EPA-HQ-OAR-2009-0923-0155-1)

Comment:

“It is time to close the loophole which has allowed the oil and gas industry to avoid reporting it's greenhouse gas emissions.” (EPA-HQ-OAR-2009-0923-0157-1)

Comment:

“Other corporations involved in the oil and gas industry, such as Halliburton, must be held accountable a well. They are part of the oil and gas extraction and part of the problem of no accountability. The Gov oil and gas regulators need teeth so that they can protect our precious environment. Please give them some power so they can do their job!” (EPA-HQ-OAR-2009-0923-0158-1)

Comment:

“These people have a culture of disregard for safety!” (EPA-HQ-OAR-2009-0923-0159-1)

Comment:

“These people have a culture of disregard for safety!” (EPA-HQ-OAR-2009-0923-0160-1)

Comment:

“It's time to get a conscience & stop letting money ruin this world. When it comes down to it, money isn't what's important.” (EPA-HQ-OAR-2009-0923-0161-1)

Comment:

“The oil industry is responsible fully for this disaster and of course they need to report on its greenhouse gas emissions. This disaster will affect every citizen in the Gulf region for years to come. No easing of reporting requirements on the oil industrys emissions should ever be legislated. This is not a political stance as it is a safety and enviornmental issue that needs everyones attention. It is clear that this country needs to get greener and cleaner in a hurry. Look at this disaster and it is clear that the oil industry is totally unprepared for leaks and explosions from their drilling rigs. They talk about the best scientist in the nation and yet no one has come up with an answer of how to stop this huge leak and no one knows what kind of long-term impact this will have on the Gulf region. Lets stop being ignorant and lets get serious about alternative energy sources.” (EPA-HQ-OAR-2009-0923-0162-1)

Comment:

“The problem is in your hands. Please do not let the responsibility slip through your fingers. Put some bite behind the bark...” (EPA-HQ-OAR-2009-0923-0163-1)

Comment:

“At this point, why don't we all focus out efforts on getting the leak in the Gulf stopped? Once we have addressed that serious problem, then we can work on the extensive clean-up to follow. All along the way, we all need to take a good, hard look at the oil industry, and what can be done to make drilling for oil completely safe for all life on this planet, even if that means ending drilling altogether.” (EPA-HQ-OAR-2009-0923-0164-1)

Comment:

“Please hold the oil and gas industry responsible for all the environmental damage that it causes by closing the legal loopholes and not allowing more to happen. The EPA is the only hope for the individual voter.” (EPA-HQ-OAR-2009-0923-0165-1)

Comment:

“WHAT MORE WILL IT TAKE TO GET YOU TO ACT?” (EPA-HQ-OAR-2009-0923-0166-1)

Comment:

“It is long past time to hold the oil industry responsible for the incredible pollution they have caused to our planet.” (EPA-HQ-OAR-2009-0923-0167-1)

Comment:

“Is this the heritage we will leave our grandchildren--an earth despoiled!!” (EPA-HQ-OAR-2009-0923-0168-1)

Comment:

“It's time to revise the hideous loop holes put in place by the Bush administration for big oil. Clearly, the industry has to safety, security and responsibility.” (EPA-HQ-OAR-2009-0923-0170-1)

Comment:

“Please start protecting the American people over big business.” (EPA-HQ-OAR-2009-0923-0172-1)

Comment:

“BP is an economic and environmental terrorist group. It is the responsibility of the EPA to ensure that our people, birds and fish are protected - as well as our drinking water. These people are killing our environment and making billions doing it. They have killed 11 people in this disaster alone, and the only people in jail are 3 volunteers from Greenpeace. There must be criminal penalties for their crimes.” (EPA-HQ-OAR-2009-0923-0174-1)

Comment:

“What about creating a fund, financed by all the oil and gas companies, that could be accessed whenever an environmental disaster strikes? But in the meantime, PLEASE hold BP financially responsible for the Gulf oil disaster and don't put the bill on the taxpayers.” (EPA-HQ-OAR-2009-0923-0175-1)

Comment:

“Once we do away with LOBBIESTS, then we can settle down to getting our country back too the way it should be.” (EPA-HQ-OAR-2009-0923-0177-2)

Comment:

“It hardly seems possible that this needs to be said -- it is urgent that we look to the future in an effort to save THE UNIVERSE!!!” (EPA-HQ-OAR-2009-0923-0178-1)

Comment:

“We have learned what these popele do just look at BP for the poster child” (EPA-HQ-OAR-2009-0923-0179-1)

Comment:

“It is time, actually past time, to begin the movement from fossil fuels to other sources or we can continue to poison our planet and make our citizens pay.” (EPA-HQ-OAR-2009-0923-0180-1)

Comment:

“The environmentalists knew that the oil and gas industry must be held accountable, but we were ignored by the government's over-fraternalization with the industry. That must stop. We must eliminate our dependence on fossil fuels and for the transtion period promote conservation.” (EPA-HQ-OAR-2009-0923-0181-1)

Comment:

“The time has come to make the oil and gas companies accountable for their pollution of our environment. We can no longer allow them to buy influence and legislation that destroys our natural environment and puts peoples health and livelihoods in jeopardy.” (EPA-HQ-OAR-2009-0923-0182-1)

Comment:

“If this childish games manshjp isn't stopped immediately, concerning pollution, there will be NO BIG oil companies...There will be NOTHING...They Haven't figured that out yet...HUH?? They need to get the thoughts of Huge Profits out of their Heads and think about saving this Planet!!!! Their Riches will mean nothingWHEN....” (EPA-HQ-OAR-2009-0923-0183-1)

Comment:

“I do not want to hear that the oil and gas industry lobbied their way out of regulation, yet again.” (EPA-HQ-OAR-2009-0923-0184-1)

Comment:

“It is time for Big Oil to come out of the closet. The continuation of life on this planet is threatened by the "fossils" who control fossil fuel. Their show is closing. Make them tell the truth.

Make them take their bows now, as they stand in the spotlight of their shame.” (EPA-HQ-OAR-2009-0923-0185-1)

Comment:

“This country is desparate for the kind of leadership that only someone in your position can provide. Please do not let us and future generations down!” (EPA-HQ-OAR-2009-0923-0186-1)

Comment:

“Our environment cannot continue to withstand this onslaught, we must change our policies and the EPA's proposal to mandate greenhouse gas reporting for the oil industry is a first step.” (EPA-HQ-OAR-2009-0923-0187-1)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-0188-1)

Comment:

“No more breaks for these lying crooks!” (EPA-HQ-OAR-2009-0923-0189-1)

Comment:

“I know Governor Perry along with the entire oil and gas industry is crying to you about how EPA actions to establish and hold the industry to emission standards will destroy the economy of Texas, put g'zillions of people out of work, etc. THEY HAVE BEEN PULLING THAT WHINE OUT OF A HAT FOR THE LAST 3 - 4 DECADES! They have held the TCEQ under their thumbs since it has existed. PLEASE stick to your guns! Local groups like GHASP and Mothers for Clean Air and the Sierra Club have been fighting all this time. We truly want your support.” (EPA-HQ-OAR-2009-0923-0190-1)

Comment:

“I hope this system also includes the Coal Industry. The entire fossil fuel industry must be curtailed as much as possible. The Electric Companies have been saying that they cannot add more wind farms because it is too expensive. I am quite certain that no wind farms or solar panels could possibly be as expensive as the coal mine accidents and the oil rig accidents have become. Tell them they MUST invest more in SAFE forms of energy. We are all very proud of what the EPA does now, and are confident you will continue your good work. We are completely fed up with the fossil fuel industries. Bicycles are becoming more attractive than automobiles. We all can walk more, and we are learning to conserve our use of electricity. We do not have to depend on fossil fuels.” (EPA-HQ-OAR-2009-0923-0191-1)

Comment:

“I am absolutely sick of big business buying their way into the legislators decision making. Texas is one of the worst states in the nation with air quality and every other environmental issue under the hot sun. Please crack down - take a stand while we have the best President in history on environmental issues in office. Stop the megabucks going to legislators from dirty energy and the lobby industry making decisions on one of the most important issues in our country.” (EPA-HQ-OAR-2009-0923-0192-1)

Comment:

“No special privileges for the oil and gas industry!!” (EPA-HQ-OAR-2009-0923-0193-1)

Comment:

“This will be a Big Step in the right direction!!” (EPA-HQ-OAR-2009-0923-0194-1)

Comment:

“The industry's refusal to cooperate with measures that affect the survival of all on our planet is similar to the story of one passenger on a full boat who was drilling a hole beneath his

seat."What are you doing?" cried the other passengers. "You will drown us all!" "It is MY seat," he replied; "I paid for it, and I can do what I want..." (EPA-HQ-OAR-2009-0923-0195-1)

Comment:

“At this critical point in history, and in light of the catastrophe that has happened in the Gulf, I can't urge you enough to make sure that theEPA enforce strict, detailed, measurements for pollution and that industry emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0196-1)

Comment:

“Last year, the oil and gas industry was exempted from the mandatory greenhouse gas reporting rule, which would have tracked its greenhouse gas emissions.” (EPA-HQ-OAR-2009-0923-0197-1)

Comment:

“I hope my government is now awake and ready to:

1. ignore industry lobbyists.
2. Put rigid regulation in place and enforce them.
3. Ensure the technologies are proven and in place before allowing evenone more well in ocean waters.
4. Require all in service wells in ocean waters to update their rigs to conform to the new standards.” (EPA-HQ-OAR-2009-0923-0198-1)

Comment:

“Our wildlife will suffer for many years and some will become extinct never more to be. We do not know or will we know for many years to come whether or not it will permanently affect our environment.” (EPA-HQ-OAR-2009-0923-0199-1)

Comment:

“WE CANNOT TRUST THEM - please make them obey the greenhouse gas reporting rules.” (EPA-HQ-OAR-2009-0923-0200-1)

Comment:

“They need to be held accountable for polluting our planet. They have been doing this since they have been drilling for oil. BP is responsible for this disaster in the gulf. They have lied to our government and the American people since day one. There have been 100's of millions of barrels of oil spilled into the gulf and no end in site. Make BP accountable for their mistake not America.” (EPA-HQ-OAR-2009-0923-0202-1)

Comment:

“If you don't hold BP and Halliburton responsible then YOU shall be Responsible.” (EPA-HQ-OAR-2009-0923-0203-1)

Comment:

“We must transition from fossil fuels to renewables as soon as possible. The sooner we hold these energy corporations accountable for their actions in meaningful ways, the better it will be for us and everybody and everything else on this fragile planet.” (EPA-HQ-OAR-2009-0923-0204-1)

Comment:

“Obviously with the current disaster that BP is creating in the Gulf of Mexico, we are seeing the necessity of legislation that will mandate that this industry must be held responsible for ALL the spin out of its activities in every place on the planet. If we do not, the future of all life on this planet is at risk.” (EPA-HQ-OAR-2009-0923-0205-1)

Comment:

“When will Big Oil companies be held accountable for the mess and the payoffs Congress is allowing? They are destroying the habitat for all.

Don't allow it anymore!” (EPA-HQ-OAR-2009-0923-0206-1)

Comment:

“I am a Sunday School teacher and I am teaching children and youth about justice, patience, self restraint and diligence versus pride, greed, envy, lust, and sloth. I am finding it difficult to point to examples in our government and in our business world of the virtues... but easily can point to the vices. Please help me, but pointing BP and other oil industries towards justice and responsibility. Caring for the health and well being of the earth should be their job, as well as making incredible profits.” (EPA-HQ-OAR-2009-0923-0208-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0209-1)

Comment:

“How can we have 4000+ rigs in the gulf and not require them to have contingency plans in the event of a spillage/leak/gusher? BP surely has made the profits to not only implement preventive measures but to have a plan in place that minimizes the impact of a diaster. After 40 days and rediculous sounding 'fixes'. it's clear there was no plan and they're flying by the seat of their pants.

It's shocking to me (and many others) how BP bribed government officials form the bottom to the top to screw the American people. Now we have other dead zones turing the Gulf of Mexico into a lifeless mess!

I'm glad to hear under a new administration, the EPA is going to the offshore -- and onshore -- oil and gas industry in the mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-0211-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0212-1)

Comment:

“I have seen the "they know what they're doing" outlook fail again and again. They become over confident and far too prone to taking foolish chances. It is part of human nature and folly to overlook.” (EPA-HQ-OAR-2009-0923-0212-2)

Comment:

“II used to have a BP card, it was where we bought our gas all the time. Then after the disaster in Alaska caused, from what I could tell, by shoddy safety standards, I tore up my BP card and don't do business with them anymore. The more potential a company has for danger, the more stringent their safety standards need to be. It is quite obvious that BP (and maybe most of the oil companies) don't have very much respect for the environment or the folks who work for and live near their businesses.” (EPA-HQ-OAR-2009-0923-0213-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0213-2)

Comment:

“It is good news that the EPA is planning to hold the oil and gas industry accountable, onshore and off. Their complicity with the Minerals Management Service has been disgusting, and the devastation speaks for itself. For the future's sake, time to act!” (EPA-HQ-OAR-2009-0923-0214-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0215-1)

Comment:

“How seriously can we consider global warming when one of the major greenhouse gas producing industries does not even have to account for its production and release? Please help stop this insanity. We all need to work together to stem the tide of global warming. We all need to work together to preserve our natural world.” (EPA-HQ-OAR-2009-0923-0215-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0216-1)

Comment:

“What good is government oversight if it is in name only!” (EPA-HQ-OAR-2009-0923-0216-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable. It takes tragedy to bring to light the inability of corporations to police themselves...as apparently they have been.” (EPA-HQ-OAR-2009-0923-0217-1)

Comment:

“I live in Missouri but have many friends who are residents of the Gulf Coast. This BP disaster is like a bad dream and you can't wake up. The devastation wreaked by its continuing and enduring horror boggles the mind and breaks the heart. The EPA needs now, more than ever, to hold the oil and gas industry accountable for its pollution of every kind.” (EPA-HQ-OAR-2009-0923-0218-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0218-2)

Comment:

“The grim BP disaster unfolding in the Gulf, shows that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0220-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0222-1)

Comment:

“Until the true and total cost of carbon fuels are known we can not have a rational discussion on an energy policy for this country to move towards alternative energy sources.” (EPA-HQ-OAR-2009-0923-0222-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0225-1)

Comment:

“I urge you also to make sure that reporting by companies is complete, thorough and unbiased, with no hidden oil spills or hidden environmental damage.

I am depending on you to do right by the public, the environment, and the law.” (EPA-HQ-OAR-2009-0923-0225-2)

Comment:

“The BP disaster unfolding in the Gulf - still on-going with no end in sight since the latest effort failed - has already become the nation's worst environmental wreck. The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0226-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0227-1)

Comment:

“Please help preserve our coastline! And while you're at it, please help preserve our rivers, such as the Susquehanna River that's now threatened by gas drilling in the Marcellus Shale.” (EPA-HQ-OAR-2009-0923-0227-2)

Comment:

“WHEN IS TOO MUCH ENOUGH?

As long as I can remember, there have been science fiction stories about people who trashed our beautiful planet for profit - short-term, senseless, greedy profit - obscenely rich industrialists who were able to escape and colonize another planet, leaving the vast majority of ordinary people here in a blackened, excavated, oil-soaked, dying place which would no longer sustain life.

IS THIS WHERE WE HAVE FINALLY COME? MAYBE THERE IS NO ESCAPE FOR THE SHORT-SIGHTED CORPORATION EXECUTIVES, BUT FOR DAMN SURE THERE'S NONE FOR THE REST OF US: THIS IS NO SCI-FI TALE! IT'S REAL LIFE . . . AND REAL DEATH.

STRICTLY-ENFORCED REGULATORY LAWS ARE OUR LAST, BEST HOPE. LET US PRAY THAT IT IS NOT ALREADY TOO LATE! . . . PRAY - THEN ACT!” (EPA-HQ-OAR-2009-0923-0228-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry **MUST BE HELD ACCOUNTABLE**” (EPA-HQ-OAR-2009-0923-0228-3)

Comment:

“THIS IS LONG OVERDUE!

PLEASE UNDERSTAND THAT IT IS UP TO YOU TO ENSURE THAT THE SYSTEM USES RIGOROUS, DETAILED, DIRECT POLLUTION MEASUREMENTS AND THAT THE INDUSTRY'S EMISSIONS ARE INCLUDED IN THE REPORTING SYSTEM NOW!

YOU MUST ACT - FAST AND DECISIVELY - THERE IS NO OTHER OPTION! THE "FUTURE" IS UPON US! WHAT WILL IT TAKE TO MAKE US ALL WAKE UP?" (EPA-HQ-OAR-2009-0923-0228-4)

Comment:

“Living on the Gulf Coast of Florida, I realize, if we have learned anything watching the grim BP disaster unfolding to the West, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0229-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0230-1)

Comment:

“This is a reminder of the careless safety behaviors and overall unpreparedness of big oil. It is time we start to move away from fossil fuels and put a concerted effort towards CLEAN energy, solar, wind, power cells. I urge you to please make this happen for the sake of future generations.” (EPA-HQ-OAR-2009-0923-0230-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0231-1)

Comment:

“***** It never cesses to amaze me at the way a big beautiful country like America allows big money to literally poop down the throats of it's citizens. What has to happen before you WAKE UP????????????????*****” (EPA-HQ-OAR-2009-0923-0231-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0232-1)

Comment:

“Honestly, I am appalled at what the Old Energy industry gets away with in exploiting our air, water, and wildlife both on land and sea. Not to mention their exploitation of labor whose communities often bear a disproportionate share of these costs.

It's long-past time that the free ride for Big Oil ends!” (EPA-HQ-OAR-2009-0923-0232-2)

Comment:

“I support EPA's proposal to require reporting of greenhouse-gas emissions from the offshore and onshore oil and gas industry” (EPA-HQ-OAR-2009-0923-0233-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0234-1)

Comment:

“Enough is enough, take care of the people. not the corporations that pay you!!!” (EPA-HQ-OAR-2009-0923-0234-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, with BP having a history of safety violations that have caused lives as in the Texas City refinery explosion and the more recent disaster in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0235-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0236-1)

Comment:

“Please hold the oil and gas industry accountable for their actions.” (EPA-HQ-OAR-2009-0923-0236-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0237-1)

Comment:

“Please don't let the oil and gas industry slide out from under their responsibilities.” (EPA-HQ-OAR-2009-0923-0237-2)

Comment:

“Oil companies must be held accountable for the horrific disaster that continues to unfold in the Gulf!” (EPA-HQ-OAR-2009-0923-0238-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0239-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable for the significant environmental, economic and social current and long term costs and to require of them a do no harm strategy since the leaders of these organizations are too out of touch with their conscience's to consider do no harm. If we do not bring accountability to this and other businesses we will wipe out our chances for a sustainable future.” (EPA-HQ-OAR-2009-0923-0240-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0241-1)

Comment:

“I believe it only fitting justice to make the oil barons (live, eat, sleep and work) in the disaster areas just as the locals must UNTIL it is proven to be clean and safe once more for all. Safe for the wildlife, safe for the people who work and call those areas home. Make them have to breathe

the toxic air along with the rest of us. Make them have to drink the water like the rest of us. Make them feel the reality of suffering they chose to impose on so many, many living beings for decades to come. Take them out of their gilded castles and yachts and into the sludge riddled beaches without respirators, as they force others to do, and make them clean this mess.” (EPA-HQ-OAR-2009-0923-0241-2)

Comment:

“I was and am from the get-go against the idea of off shore drilling. I feel that in regards to the grim BP disaster unfolding in the Gulf, the oil and gas industry MUST be held accountable.” (EPA-HQ-OAR-2009-0923-0242-1)

Comment:

“This is unforgivable!! As our world, Mother Earth is at its most delicate, this catastrophe happens! In its most fragile state due to many decades of careless abuse, its inhabitants and businesses/Industries all pull together commercially, in the home, as well as individuals themselves on world-wide levels try to save it, by making BIG changes in BIG ways to "Go Green", this masacre inexcusably takes place...and it couldn't be at a worse time!” (EPA-HQ-OAR-2009-0923-0242-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0243-1)

Comment:

“What is happening now is devastating to our wildlife, our economy and our citizens. We need you to be strong and do what's right for our Country and our future. Please, we are counting on you. Can we really survive another one of theses spills? Thank you.” (EPA-HQ-OAR-2009-0923-0243-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0244-1)

Comment:

“The next disaster could be caused by radioactive waste or leaks from nuclear power plants. We need to stop companies from going ahead with their business until they have truly solved the problems which can have long-lasting effects on our environment.” (EPA-HQ-OAR-2009-0923-0244-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0245-1)

Comment:

“The oil and gas industries have been given a free ride for too long and now our planet is in peril. Greed by a few has led to devastation for all. What do I tell my grandchild?” (EPA-HQ-OAR-2009-0923-0245-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0246-1)

Comment:

“It is TIME to evolve past this insanity! Just because the oil corps PAY our public servants to let them destroy the planet that belongs to us ALL (not them) and pay them to manipulate OUR laws and their job description is why we are ready to vote strike, tax strike (class action law suit) and general strike. Nope, you will NOT get violence from us!” (EPA-HQ-OAR-2009-0923-0246-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0247-1)

Comment:

“Above all, stop this coziness between govt employees and big oil (and other corporations, too). This has brought ownership of our country into the hands of international corporations (who do not pay their share of taxes, if any at all and do not have public interest at heart).” (EPA-HQ-OAR-2009-0923-0247-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0248-1)

Comment:

“PLEASE! THIS IS TOO IMPORTANT AND IT IS TIME THE PUBLIC INTEREST STANDS ABOVE ALL ELSE!” (EPA-HQ-OAR-2009-0923-0248-2)

Comment:

“Hello out there !!!! What's it going to take for you to wake up? If you have learned anything watching the grim BP disaster unfolding in the Gulf, it should be that the oil and gas industry has no contingency plans and must be more closely regulated and held accountable for their failures.” (EPA-HQ-OAR-2009-0923-0249-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0250-1)

Comment:

“I am especially concerned about this because Virginia's governor seems determined to go ahead with plans for offshore drilling even though it is opposed not only by environmental activist organizations but also by the US military (Department of Defense) because it would interfere with Navy operations.” (EPA-HQ-OAR-2009-0923-0250-2)

Comment:

“We hould have learned by now that we have sucked all but the dredges out of our dear earth. If we don't want Mother Nature to tear us completely up we will stop now and not plan on going green but do it.

There is no time to waste. Oil and coal are the past. It's time for the future. The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0251-1)

Comment:

“Let's us our backbone for clean energe now.” (EPA-HQ-OAR-2009-0923-0251-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0252-1)

Comment:

“I am amazed that oil companies are allowed to drill off shore at depths at which they are unable to fix any problems that arise. The idea that they can drill so deep that if something goes wrong they can't fix the problem makes no sense to me at all. Why on earth is that allowed? Then to say that the same companies will not have to be accountable for the damage they are causing is unthinkable. A basic human law is that people must be held responsible for their actions. Companies must be held to the same law. Please, please do what is right to save the planet and not worry about how much money oil companies are making. If oil companies are able to foul our planet with little or no consequence, they will continue to do so. The planet cannot afford any more of these oil spills. It can't afford the one that is still spewing oil into the ocean now. The oil companies MUST be held accountable.” (EPA-HQ-OAR-2009-0923-0252-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0254-1)

Comment:

“It is said that the entire contents of the Macondo oil deposit will likely unload into the gulf. It is estimated that this deposit holds 50 million barrells. One barrell is 42 gallons; that is 2,100 Million Gallons.

How do you think the world's oceans can escape being poisoned from this one ongoing spew?

The Gulf is dead. you have killed it. The Gulf Stream travels up the eastern american coast and over to europe. All of the oceans are connected.

What if someone injected just 1/3 cup of crude oil into a "corner" of your cup of water. Just over in the corner of your cup. just on one side. Would you drink that water?

How can you not stop current and future offshore projects?

There is no justification. Not all the money in the world bank, if it was in your pocket (which,

clearly this is about money in private pockets), can un-poison the world's and your food supply..

What have you done?" (EPA-HQ-OAR-2009-0923-0254-2)

Comment:

"If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0255-1)

Comment:

"Regardless of the BP incident, oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0255-2)

Comment:

"If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0256-1)

Comment:

"When will big oil companies ever think about anyone else besides themselves...you do not seem to care much about your own children nor their children and the environment you leave to them." (EPA-HQ-OAR-2009-0923-0256-2)

Comment:

"If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0257-1)

Comment:

"We only have one world, one chance to get this right!" (EPA-HQ-OAR-2009-0923-0257-2)

Comment:

"If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0258-1)

Comment:

“Enough is enough. It is time to hold gas oil accountable, because they still want to do bad things. That has got to stop now. Those people still need to respect the environments and not pollute anymore.” (EPA-HQ-OAR-2009-0923-0258-2)

Comment:

“We need accurate information about the extent of all kinds of pollution if we are to make a difference with the climate change threat.” (EPA-HQ-OAR-2009-0923-0259-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0259-2)

Comment:

“It is shocking to see what is happening to wildlife and the marshes in the area affected by the oil spill. The impact of human greed and error is almost unbelievable but there it is for all to see.” (EPA-HQ-OAR-2009-0923-0260-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0260-2)

Comment:

“YOU KNOW WHAT YOU HAVE TO DO, SO HAVE ENOUGH BALLS TO DO IT! STOP THE MADNESS BEFORE IT'S TOO LATE.” (EPA-HQ-OAR-2009-0923-0261-1)

Comment:

“No more "business as usual" for Big Oil, King Coal, and other polluters!” (EPA-HQ-OAR-2009-0923-0262-1)

Comment:

“The current oil spilling into the Gulf only highlights a long-standing problem of letting big oil companies off the hook.” (EPA-HQ-OAR-2009-0923-0263-1)

Comment:

“The oil and gas industry must be held accountable for its actions. Last year, the industry manouvered its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. It looks like the EPA is proposing to correct this loophole and include the offshore - and onshore - oil and gas industry in the system. I am very much in favor of that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0264-1)

Comment:

“Please, we can find ways to produce clean energy, protecting the air we breathe, the water we drink, the fish we hope to eat, and curbing human-driven climate chaos! I respect your work and sincerely hope for stronger, inclusive emissions reporting and control.” (EPA-HQ-OAR-2009-0923-0265-1)

Comment:

“The oil industry continues to make record profits.....during our recession when so many are losing jobs and income, oil makes more and more money! If leasing the rig in the Gulf cost \$500,000 each day, how much money are they actually making to cover those costs and still make a profit. Their profit comes at the expense of the American people AND our environment. Please hold the oil companies accountable and financially responsible for the damage they are causing!” (EPA-HQ-OAR-2009-0923-0266-1)

Comment:

“We need to know about the greenhouse gases - we can't fix the problem until we know how big the problem is.” (EPA-HQ-OAR-2009-0923-0267-1)

Comment:

“Look up, Look down, and look all around you will see pollution all around. Now are you going to do anything about the pollution your eyes prove it's there. PEACE-DL” (EPA-HQ-OAR-2009-0923-0268-1)

Comment:

“Pleading in the past for accountability was never heard, or if heard was never fully acted on. The American public deserves more. The Gulf Coast States deserve more. It is a bloody shame that an oil leak disaster was the cause of the newest public revolt. We had to have what we knew re-learned by daily watching of the grim BP disaster unfolding in the Gulf. Simply stated -- the

oil and gas industry must be held accountable! If I let an excessive amount of water flow into my sewer system who do you think pays the bill? My utility provider?

Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore - and onshore - oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

I believe it is EPA's responsibility to correct accountability - in all areas.” (EPA-HQ-OAR-2009-0923-0269-1)

Comment:

“The current events are shameful and we need to insure that oil companies are included in tracking their impact on the environment.” (EPA-HQ-OAR-2009-0923-0271-1)

Comment:

“The oil and gas industries have continued to enjoy record or near record profits year after year after year, all at the expense of we consumers, and they have done it by short-cutting safety and the environment. We must stand against this atrocity and hold them accountable, in full, and with severe penalties.” (EPA-HQ-OAR-2009-0923-0272-1)

Comment:

“Time is no longer on our side. The earth is severely stressed, and we must do all in our power to end this period wanton distruction.” (EPA-HQ-OAR-2009-0923-0273-1)

Comment:

“We must be responsible and limit our effect on the environment as much as possible. It's taken the planet tens of thousands of years to evolve and mankind is destroying it in hundreds (pollution, extinction of species, etc.).” (EPA-HQ-OAR-2009-0923-0274-1)

Comment:

“Please hold the oil industry accountable for there actions” (EPA-HQ-OAR-2009-0923-0276-1)

Comment:

“We must do this for our future and for future generations.” (EPA-HQ-OAR-2009-0923-0277-1)

Comment:

“It's time that big oil takes responsibility for their messes. No more offshore drilling until a tested plan is in place in case of disaster, safety procedures and equipment must be in place before any drilling occurs and big oil should be made to pay for any cleanups. They have the money. Their profits have never been higher.” (EPA-HQ-OAR-2009-0923-0278-1)

Comment:

“First the banks, exempted from reaping the just spoils of their greed through the government and tax-payer bail-out. Now BP? The gas and oil industry have to pay their own way here. They made the profits, they need to pay the price of the mess in the Gulf.” (EPA-HQ-OAR-2009-0923-0279-1)

Comment:

“It is time to end the tax payer bail out for companies who profit from Americans but put our country at risk economically and environmentally.” (EPA-HQ-OAR-2009-0923-0280-1)

Comment:

“I fully support the Sierra Club's position on this issue. It is important for government agencies and the public in general to have as much access to this information in order to allow informed decisions to be made.” (EPA-HQ-OAR-2009-0923-0282-2)

Comment:

“The public deserves full disclosure of drilling practices!” (EPA-HQ-OAR-2009-0923-0283-1)

Comment:

“Why is BIG oil and gas industry exempt from the rules others must adhere to? Is this not against our basic principles? Exemptions and subsidies for corporations that make billions in profits while the average citizen is suffering must stop.” (EPA-HQ-OAR-2009-0923-0284-1)

Comment:

“After the events of the last month and a half, this is certainly going to be the most politically expediant time to accomplish something worthwhile.” (EPA-HQ-OAR-2009-0923-0285-1)

Comment:

“We live on a very small island - the Earth. There's no place else we can go to survive. We can't take it for granted and we can't continue the practices that have brought us so perilously close to extinction.” (EPA-HQ-OAR-2009-0923-0286-1)

Comment:

“I have always wondered at the wisdom of drilling for oil in our oceans. Now my predictions have come true. What else has to happen for us to wake up and regulate these industries more closely. They answer to the bottom line, not the public or world good.” (EPA-HQ-OAR-2009-0923-0287-1)

Comment:

“It is time for the EPA, as a government agency, to protect the environment for the American people. If these companies do not have protective actions in place, they need to have them before given permits to drill.” (EPA-HQ-OAR-2009-0923-0288-1)

Comment:

“It's not just the Gulf and offshore drilling that's a problem - it can be wherever drilling takes place. We are facing potential disaster from natural gas drilling in the Catskills and the Marcellus Shale. The EPA needs to have authority over all aspects of drilling. Companies are made to exploit. Regulations are the rules within which companies must live. Without strong regulations we will have more horror stories like the Gulf and Dimock, PA.” (EPA-HQ-OAR-2009-0923-0289-1)

Comment:

“This disaster created by willfull negligence on the part of BP should not go unpunished and this should be a lesson to all of us how oil companies operate.” (EPA-HQ-OAR-2009-0923-0290-1)

Comment:

“The oil companies must be made to adhere to standards that protect the environment and the health of the planet.” (EPA-HQ-OAR-2009-0923-0291-1)

Comment:

“Please do the right thing. Someone with influence and power needs to!!” (EPA-HQ-OAR-2009-0923-0292-1)

Comment:

“Enough is enough! It is time we end this disastrous and disaster prone flirtation with the deep pockets of a relatively few "generous" businessmen. Common citizens are not treated nearly so well when the most minor offense occurs.

We must get off of this dependence on fossil fuels. The first step is by ending this affair with the fossil fuel industry by demanding accountability for their actions to the last detail.” (EPA-HQ-OAR-2009-0923-0293-1)

Comment:

“I don't want my hard earned money and taxes to go to a big cheating oil company that makes such huge profits while I'm struggling to make ends meet!” (EPA-HQ-OAR-2009-0923-0294-1)

Comment:

“Again massive and invasive corporate lobbying severely distorts our representatives' and regulators' view - ordinary citizens who are extraordinarily effected by corporate wrong doing need a way to balance the field.” (EPA-HQ-OAR-2009-0923-0295-1)

Comment:

“The time is now for clear action on the issue of energy and how we pollute our earth.” (EPA-HQ-OAR-2009-0923-0296-1)

Comment:

“There is no way one can watch the damage in the Gulf and not be moved by the destruction.

I trust that you will work for the future and not support Big Polluters.” (EPA-HQ-OAR-2009-0923-0297-1)

Comment:

“I've learned that all you care about is money...not people...you have no conscience..no idea of what risks you are taking, because YOU DON'T CARE...WELL, as the Bible says...if you sew the wind you'll reap the whirlwind...and baby, here it is. Yes, we are all culpable in many ways...because of our addiction to that black gold you drill for. But this is Your and OUR

WAKE UP CALL...it's over, plug that leak and leave all waters alone. We will concentrate on renewable, cleaner energy and you WILL pay for this! (we all are paying)...saddest thing I've ever seen. "At long last, have you no shame?" But for \$500,000 blowout preventer...you said no and now look at what you have done...plus 11 dead, have you no comments on that or are you busy covering your behind from lawsuits! I am sicked by my oil addiction and your skulduggery. I've had enough." (EPA-HQ-OAR-2009-0923-0298-1)

Comment:

"Enough is enough! The oil drawn from the Gulf is inconsequential to the risk. We have alternative energies to adjust for the loss of this one source." (EPA-HQ-OAR-2009-0923-0300-1)

Comment:

"Got Oil? Go to the Gulf!" (EPA-HQ-OAR-2009-0923-0301-1)

Comment:

"For many years we listened to different sides of the "global warming" issue and didn't know what to believe. Now we know that global warming is a fact and that we will all be affected. Why isn't the goal of each government organization to stop the leading companies from make decisions to ignore the consequences of global warming and lobby to keep legislation from curtailing methods that endanger our daily existance?" (EPA-HQ-OAR-2009-0923-0302-1)

Comment:

"Our very planet is at stake if we do not hold EVERYONE and every organization accountable for their pollution." (EPA-HQ-OAR-2009-0923-0303-1)

Comment:

"Hold the oil industry accountable! Regulate it!

This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.

I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible." (EPA-HQ-OAR-2009-0923-0304-1)

Comment:

“tracking the gas and oil industry could have possibly led to exposing the safety of the oil rigs and ruled for them to install safety measures and this would have never happened.. too many secrets due to buying out disinformation with too much money.billions...cathy ,bless this earth.” (EPA-HQ-OAR-2009-0923-0305-1)

Comment:

“It is time that the EPA go above and beyond ways to "FULLY" protect the environment, and not the people.” (EPA-HQ-OAR-2009-0923-0306-1)

Comment:

“Please close this loophole, it is time to recognize that the status quo is no longer good enough and make some serious changes that will hold industries accountable for their actions.” (EPA-HQ-OAR-2009-0923-0307-1)

Comment:

“Lately and not surprisingly, I've been thinking about all that wasted energy: People attending protests, phoning, writing angry letters and sending beseeching emails (like this one) to the various environmental groups, the media, to internet blogs, government agencies and officials, known corporate polluters, to each other, encouraging others to get involved...

And then there's the energy used by the armies of government, media, and corporate people, and private citizens to travel to and fro and investigate and report/spin on the situation...

And THEN there's the energy yet to spend on hearings, prosecution, trials, appeals, etc.

ALL BECAUSE THE CITIZENS OF THIS DEMOCRACY BELIEVE THAT JUSTICE, WHILE BLIND, WILL STILL DETERMINE THE OBVIOUS. ...or should we all just roll over... and save our energy?” (EPA-HQ-OAR-2009-0923-0308-1)

Comment:

“If the federal government cannot control and hold the oil and gas industry accountable for their practices, who can? The EPA needs to be strong.” (EPA-HQ-OAR-2009-0923-0309-1)

Comment:

“PLEASE PLEASE BE STRONG -- AND STOP BIG OIL!” (EPA-HQ-OAR-2009-0923-0310-1)

Comment:

“As a former member of the U.S. Coast Guard and former resident of the Gulf Coast, I have been watching the disaster in the Gulf with deep anguish. Our environment and our citizens need and deserve the support of our government. The oil and gas industry is only a part of the mosaic of American society and should not be given undue advantages.

I wholeheartedly support the Sierra Club's position” (EPA-HQ-OAR-2009-0923-0312-1)

Comment:

“Please take the necessary action to regulate these industries, for the good of the American people and our environment.” (EPA-HQ-OAR-2009-0923-0312-2)

Comment:

“No more. It is time to make sure this does not happen again. The only way forward is to hold the oil and gas industry truly accountable. Not phony accountability. Real and effective regulation.

America is watching. And it is angry.” (EPA-HQ-OAR-2009-0923-0313-1)

Comment:

“Your job is to protect our environment. If you are incapable of doing this, please quit and allow someone to take over who is capable and cares about our country, it's people and wildlife, and the fragile ecosystem that keeps us all alive.” (EPA-HQ-OAR-2009-0923-0314-1)

Comment:

“They should also account for emissions that result from spills and other accidents.

We must immediately support more renewable sources of energy.” (EPA-HQ-OAR-2009-0923-0315-1)

Comment:

“The energy industry makes larger profits than any other, causes more damage than any other and should thus be held accountable more than any other.” (EPA-HQ-OAR-2009-0923-0316-1)

Comment:

“To do anything less would be criminal. Thank you.” (EPA-HQ-OAR-2009-0923-0317-1)

Comment:

“Thank you for giving STRONG support to the citizens of our country who know the oil industry has been running on favors and overlooking of safety rules for too long --- they MUST be held accountable for the ruin such carelessness makes possible -- they MUST put our environment and human lives ABOVE their appetite for PROFITS at any risk!! It is immoral to allow them to ruin our planet earth and that is what they are doing -- the citizens of our country MUST adjust their appetite for the luxuries at any cost -- we MUST fight” (EPA-HQ-OAR-2009-0923-0318-1)

Comment:

“Put their execs in prison, confiscate their wealth, put the stockholders on notice no profits til they compensate the world for their destruction and go back fifty years into their bank accounts til the money equals repairing the ocean to a pristine form.” (EPA-HQ-OAR-2009-0923-0319-1)

Comment:

“I strongly support that decision, and I urge you to ensure that the system switches at the earliest possible time to the use of rigorous, detailed, direct pollution measurements, plus a reporting system that requires regular reports on the industry's emissions.

If we have learned nothing else from watching the grim BP disaster unfolding in the Gulf, it should be that the oil and gas industry will NOT self-regulate, will NOT voluntarily provide accurate or timely data to regulatory and monitoring agencies, will NOT be forthcoming about risk issues, and will NOT hold themselves accountable when things go wrong!

The people of this nation must look to the EPA to protect our country's interests and bring Big Oil under control. Please do not back down on these issues!” (EPA-HQ-OAR-2009-0923-0320-1)

Comment:

“It is time these people are forced to cough up huge, huge sums of money in this current disaster, and are forced to do so in the future if they continue raping the environment. Money is the only

thing they understand, and making them pay huge sums is the way to get to them, finally.” (EPA-HQ-OAR-2009-0923-0321-1)

Comment:

“It's a little like locking the barn door, after the horse got out. Still, it's the only thing that we can do - enact strict environmental safeguards for all our activities that happen outdoors.

It's unconscionable that BP didn't know how to fix this problem, already figured out by their scientists and engineers.” (EPA-HQ-OAR-2009-0923-0323-1)

Comment:

“Wake up and realise we can not live in a world that we are destroying. Stop living in a dream, this is real and something needs to be done about it!

Time to leave the primitive ways behind . . .” (EPA-HQ-OAR-2009-0923-0324-1)

Comment:

“Cleaning up oil Industry emissions and spills costs money. This industry has must be made to pay for it.” (EPA-HQ-OAR-2009-0923-0325-1)

Comment:

“Seems like everyone has forgotten the lessons they could have learned from a similar disaster 30 years ago. We cannot stand by and watch greed ruin our beautiful earth and the lives and livelihoods of those touched by greed's self-made disasters. Please use your power now to prevent this from ever happening again.” (EPA-HQ-OAR-2009-0923-0326-1)

Comment:

“The Exxon V. and recent BP oil disasters point to a huge wrong being perpetrated on American citizens and small businesses. The wrong is in the caps that have been placed on industry payments and liabilities without proper review and approval by federal agencies. Given: 1.) the horrendous consequences being revealed daily in the BP incident; and 2.) the corrupt, even salacious relationship now evident between government agencies and corporate entities; it is now painfully obvious that the entire regulatory structure must be thoroughly reviewed and revised to meet the requirements of a safe, environmentally sound program of qualification, regulation and comprehensive compensation.

It is fundamentally unfair and should be made a criminal offense to practice "cost externalization" at the expense of an unsuspecting, intentionally miss-informed citizenry. That practice must be terminated -along with those who make a living by inflicting externalized costs of doing business on the rest of us. All losses and damages suffered by small businesses and private citizens must be fairly and promptly compensated.

This is one more glaring example of why our elections must be 100 percent publicly funded. We must no longer tolerate the costs of corporate entities buying and subsidizing our elected officials and the kind of legislation that serves us ill at every turn. We The People demand the strongest possible legislation to protect us and our environment from destructive mineral extraction and to ensure our well-being and prosperity now, and for future generations!" (EPA-HQ-OAR-2009-0923-0327-1)

Comment:

"Let this tragedy in the Gulf lead us to better regulation and independent oversight in the future. Surely every single well operating in the ocean should be examined for any weakness, and a system devised and readied to stop a blowout if ever one happens again." (EPA-HQ-OAR-2009-0923-0328-2)

Comment:

"We have to wake up and finally take care of our planet. It is the only place we have to live!" (EPA-HQ-OAR-2009-0923-0329-1)

Comment:

"it should be imperative that all fail systems should always be carefully monitored so that a calamity like this never occurs again." (EPA-HQ-OAR-2009-0923-0331-1)

Comment:

"I live in Texas, near the Gulf Coast, and demand that we hold them accountable." (EPA-HQ-OAR-2009-0923-0332-1)

Comment:

"This is not a question of who has the most money to buy favor. This is a question of the survival of the planet. Ask the animals and the families of the Gulf if big oil should be let off the hook again." (EPA-HQ-OAR-2009-0923-0333-1)

Comment:

“The Gulf Oil Spill is another wake up call, and the public, the taxpayers who are paying your salaries, who you are supposed to be protecting, are asking you to protect us, Mother Nature, before more insults to our environment, before we self destruct.” (EPA-HQ-OAR-2009-0923-0334-1)

Comment:

“Shut down the destructive forces that are robbing the future. Stop the fracking of earth to get at natural gas, the topping of mountains to get at coal and the drilling of oil in the oceans, bays, all other waters and the Artic. Find the ways the Bush Administration f*cked the world for generations to come while lining the pockets of BIG OIL and BIG Business by loosing standards and regulations. Can you fire some of the crooked, incompetent "regulators" who gave safety rewards and certification to Deep Water? Those people are either stupid as all get out or criminals who should be incarcerated.” (EPA-HQ-OAR-2009-0923-0335-1)

Comment:

“It is time to finally stop the corruption!” (EPA-HQ-OAR-2009-0923-0336-1)

Comment:

“We cannot continue to allow the oil and gas industry to (literally) get away with deaths & pollution. It is passed time to crack down on the oil and gas industry regardless of their greedy deep pockets.” (EPA-HQ-OAR-2009-0923-0337-1)

Comment:

“The truth is our path, not only to freedom, but to personal and planetary health.” (EPA-HQ-OAR-2009-0923-0338-1)

Comment:

“It is quite obvious that the Oil, Coal and Gas industry have been ripping the public off for years, while being nearly fully responsible for ruining the environment and driving the poor right into the ground. Gas prices are once again heading for out of controll.

It is unforgivable that these sharks could get away with anything they please and continue to gouge the public, and laugh all the way to the filthy banks with their billions. This is not the way that life should be.

If you do not do something to controll these people (and i use that word loosely, we will no longer have an earth to support us. The old adage, you can't take it with you applies here. PLEASE PLEASE USE THE POWER YOU HAVE TO RECTIFY THIS VERY REAL PROBLEM, AND PLEASE DO NOT LET THE WORD MISTAKE ENTER INTO THIS. THIS IS NO MISTAKE, THIS IS A CRIME AGAINST NATURE, AND AGAINST THE PEOPLE OF THE U.S. DO SOMETHING, AND DO IT RIGHT. NO LOOPHOLES FOR THESE SCATHING RATS TO TAKE OVER ANY MORE.” (EPA-HQ-OAR-2009-0923-0339-1)

Comment:

“President Obama's election promised a return to government by the people as opposed to government by corporations. It's time to fulfill that promise.” (EPA-HQ-OAR-2009-0923-0340-1)

Comment:

“The U.S. taxpayer is at their collective limit. Although programs that would directly benefit us, like badly needed infrastructure renewal, health and welfare programs for the elderly and the poor (like Medicaid and Medicare) are considered "too expensive", we have lots of money for bank bailouts, and oil company subsidies. It should be apparent to everyone that we won't (will not) absorb any more losses from huge multinationals like Citigroup, Chase, Wells Fargo, Wachovia, the stellar and well-connected Goldman Sachs, British Petroleum, Exxon, Shell. You will soon face a tax revolt...if you don't face an open revolt in the streets. Get on our side...it's after all the side of your own children and grandchildren.” (EPA-HQ-OAR-2009-0923-0341-1)

Comment:

“The BP disaster unfolding in the Gulf shows more than ever that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-0342-1)

Comment:

“Perhaps we can prevent another environmental diaster.” (EPA-HQ-OAR-2009-0923-0343-1)

Comment:

“It is important to get to the truth.” (EPA-HQ-OAR-2009-0923-0344-1)

Comment:

“DO IT NOW. TOMORROW IS NOT SOON ENOUGH. As far as I know, we have only one earth; let us keep it as long as possible in its present state or at least a reasonable facsimile.” (EPA-HQ-OAR-2009-0923-0345-1)

Comment:

“I worry endlessly about our children and the world we are leaving to them.” (EPA-HQ-OAR-2009-0923-0346-1)

Comment:

“When will the government get out of bed with big business and make protecting the people, wildlife and environment more important than profits?

TAKE A STAND!!! And make sure nothing like this nightmare ever happens again!” (EPA-HQ-OAR-2009-0923-0347-1)

Comment:

“The Earth Mother need your help more today than ever.” (EPA-HQ-OAR-2009-0923-0348-1)

Comment:

“In an effort to deal with our energy issues too many sweetheart deals have been accorded to the oil industry. It is time for transparency.” (EPA-HQ-OAR-2009-0923-0349-1)

Comment:

“No industry should be allowed to hide or be exempt from reporting any and all pollution their industry creates.” (EPA-HQ-OAR-2009-0923-0350-1)

Comment:

“The oil and gas industry must be held accountable for disasters such as the one unfolding in the Gulf of Mexico. Unfortunately, the industry lobbied its way out of the mandatory greenhouse gas reporting rule last year, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-0351-1)

Comment:

“Thank you for your excellent work so far in extending and enforcing protection of our environment and air. I hope that a tax on carbon will make big polluters like the oil and gas companies pay the real costs of their operations and send some of their "profits" to build renewable energy alternatives.” (EPA-HQ-OAR-2009-0923-0352-1)

Comment:

“We cannot afford another disaster of this scale. BP has announced that they will take full responsibility for damages. Please help to hold them to their word.” (EPA-HQ-OAR-2009-0923-0353-1)

Comment:

“It just makes sense. Thank you for your consideration.” (EPA-HQ-OAR-2009-0923-0354-1)

Comment:

“As I understand, our mandatory greenhouse gas reporting rule, which we have placed upon all the manufacturers and various industries in this country, does not presently apply to the oil and gas industry. How can we possibly know where the pollution comes from if we don't measure all the possible sources?! The EPA is now proposing to include the off- and on-shore oil and gas industry in the mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-0355-1)

Comment:

“I further recommend that an additional rule be drafted to require pollution reporting from any industry that sells to the United States. It is the height of hypocrisy if we close our eyes to the effects of external manufacturers while at the same time we are largely responsible for their success. They may not be required to act responsibly by their own countries, but we should not be blindly supporting pollution outside our borders.” (EPA-HQ-OAR-2009-0923-0355-2)

Comment:

“We cannot afford to allow lobbying and politics to undermine a system of checks and balances, of regulation which can help to prevent such disasters as this in the future.” (EPA-HQ-OAR-2009-0923-0356-1)

Comment:

“It is time to stop giving the oil companies free reign to do what they want, how they want. They will do whatever they can to better their profits, without thought of how this may affect the environment or people. Please help protect us.” (EPA-HQ-OAR-2009-0923-0357-1)

Comment:

“Please do the right thing for our planet and our children. We only have one Earth to live on and if we destroy it through reckless and carelessness, we all suffer. No amount of money can be worth that outcome!” (EPA-HQ-OAR-2009-0923-0358-1)

Comment:

“I am the founder and newly retired director of Reef Relief that fought for th past twenty-three years to stop dangerous offshore oil and gas development in fragile marine areas such as the Florida Keys. Now that the BP Gulf oil disaster has proven our worst fears possible, and after we can definitely tell you "we told you so." isn't it time to do the right thing and stop destroying the environment through this polluting, short term energy source?” (EPA-HQ-OAR-2009-0923-0359-1)

Comment:

“This is the perfect opportunity to correct this egregious error. Don't let the oil and gas industry off the hook!” (EPA-HQ-OAR-2009-0923-0360-1)

Comment:

“Stop lining your pockets with payoffs from big oil. Do the right thing, for a change!!” (EPA-HQ-OAR-2009-0923-0361-1)

Comment:

“I think it's time to try something different regarding the oil and gas industries: instead of listening to lobbyists, listen to scientists and environmental experts in your own organization when making decisions that will affect our environment forever.” (EPA-HQ-OAR-2009-0923-0362-1)

Comment:

“One thing seems for sure and that is big oil can not be trusted.” (EPA-HQ-OAR-2009-0923-0363-1)

Comment:

“We must protect our environment. Please make sure the big oil companies are held accountable!!” (EPA-HQ-OAR-2009-0923-0364-1)

Comment:

“The Mexican oil disaster in the Gulf of Mexico nearly four decades ago showed that the oil industry was not prepared to deal with blowouts undersea. In the decades since, the industry did not learn how to prevent disasters, and yet they continued to drill and to make huge profits. As it turns out, those profits were made at the public's expense. The oil and gas industry must be held strictly accountable, because their only motive is shareholder profit. the government must regulate the industry or expect more disasters. NO MORE DRILLING UNDERWATER MUST OCCUR UNTIL THE INDUSTRY CAN DEMONSTRATE THEY HAVE THE TECHNOLOGY TO IMMEDIATELY SEAL ANY OIL LEAKS. The nature and purpose of industry is to create shareholder profit. Government must regulate it in the public interest. Yet government is heavily influenced by the oil industry by lobbying.” (EPA-HQ-OAR-2009-0923-0365-1)

Comment:

“I know I can't get my yearly vehicle sticker if I don't first pass a vehicle emissions test. Why should it be any different for a corporation. They should be held to even higher standards than anyone else. If they had been properly monitored, the Gulf Coast wouldn't be in the predicament it's in now. They would have gone over every scenario and had a backup plan for it. We need to fix this problem now, so we can sustain our earth into the future.” (EPA-HQ-OAR-2009-0923-0366-1)

Comment:

“Please stop giving polluting industries a free pass!!!” (EPA-HQ-OAR-2009-0923-0367-1)

Comment:

“We, the people, need to see the government being proactive. Reactive responses have not proven to be very effective during the last few disasters, either natural or man made.” (EPA-HQ-OAR-2009-0923-0368-1)

Comment:

“Our tax dollars from our paychecks help big business become billion dollar people. They give us pollution, illness and death to all living creators. Government don't you think it is time to put this madness to a stop?” (EPA-HQ-OAR-2009-0923-0369-1)

Comment:

“If anything has been made abundantly clear in watching the horrific BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-0370-1)

Comment:

“When I worked at Shell, our CEO even stated that governments must make the industry more accountable with regard to curbing GHG emissions, and thus, I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0370-2)

Comment:

“am no spring-chicken as I am going to be 69 on my next birthday. But I also have three grandchildren in college. I worry for them and for ALL the young people.” (EPA-HQ-OAR-2009-0923-0371-1)

Comment:

“I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that it include the industry's emissions in the reporting system as soon as possible.

Public opinion is finally turning very firmly against the long-standing practice of letting corporate polluters get away with dumping and spilling toxic materials at the taxpayers' expense. They have to cleanup their act, and the EPA has to enforce it.” (EPA-HQ-OAR-2009-0923-0372-1)

Comment:

“We are so disheartened watching the destruction of the Gulf coast.” (EPA-HQ-OAR-2009-0923-0373-1)

Comment:

“I know that to most people it is shocking that this message has to be sent. The government's lack of action to protect the environment against the oil and gas industry is unconscionable. This would be a step in restoring faith on the government.” (EPA-HQ-OAR-2009-0923-0374-1)

Comment:

“We try to do our part. We have driven only hybrid cars for over seven years. Release us from big oil's grip!” (EPA-HQ-OAR-2009-0923-0375-1)

Comment:

“Do not hesitate the time is now!” (EPA-HQ-OAR-2009-0923-0376-1)

Comment:

“The need for overturning the lax regulatory procedures of the last 30 years becomes more obvious everyday.” (EPA-HQ-OAR-2009-0923-0377-1)

Comment:

“I am horrified by the disaster in the Gulf Coast. This would never had happened if we had more careful and conscious surveillance of how our oceans our mined by a credible government agency.” (EPA-HQ-OAR-2009-0923-0378-1)

Comment:

“This horrible BP disaster in the Gulf should teach us that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0379-1)

Comment:

“Thank you for all your hard work at the EPA. The work you do is invaluable to our lives and lives of future generations. Please lead the way in helping our country learn from the current disaster that involves BP in the Gulf coast. The American people understand and I am hopeful that you agree that the oil and gas industry have to be held accountable for their actions” (EPA-HQ-OAR-2009-0923-0381-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it is that oil and gas exploration and extraction are very risky businesses that must, at the very least, be

tightly controlled until that day when we can stop using fossil fuels altogether.” (EPA-HQ-OAR-2009-0923-0382-1)

Comment:

“The time to act is now. Enough is enough. Close this loophole and hold oil and gas industries accountable.” (EPA-HQ-OAR-2009-0923-0383-1)

Comment:

“Enough of the greed that is killing our country and this planet. These oil barons care for nothing other than lining their own pockets with wealth. OUR government must reign in these thieves before they kill again.” (EPA-HQ-OAR-2009-0923-0384-1)

Comment:

“We need to start doing the Right things for our planet and future generations, or we will not have a home. I know we are oil and gas dependent at this time, but we must extract and use these resources in a responsible way as a human race while we develop our technologies to get off of our dependence on these limited resources. Your help in moving us along this path is very much appreciated, thank you.” (EPA-HQ-OAR-2009-0923-0385-1)

Comment:

“It is obvious that the oil and gas industry must be held to the strictest standards. Nothing less will provide the protection we need from their actions that consider profit only.” (EPA-HQ-OAR-2009-0923-0386-1)

Comment:

“It would be unfair for anyone but the oil industry and those involved in this disaster to pay for this fiasco! If the company that made the well, the company running the well or whatever other problems pertain to this disaster, those companies should be held accountable. I have been getting e-mails asking for money regarding this from environmental groups. I do not think the American public should pay for this disaster. The Americans will be paying in the loss of the fishing industry, tourist industry and the ecosystem. Corporations need to be responsible for their actions!” (EPA-HQ-OAR-2009-0923-0387-1)

Comment:

“It is clear the oil, gas and coal industries need to be regulated. They have NO concern for the environmental impacts of their respective businesses. They lie to the public through TV advertisements. They put the almighty dollar before the health and well being of the public and the environment. The Oil and Gas Reporting Rule is a first big step in letting the public know the impacts of their businesses.” (EPA-HQ-OAR-2009-0923-0388-1)

Comment:

“There is a business adage that says "if we can't measure it, we can't manage it. We need to have all emissions reported.” (EPA-HQ-OAR-2009-0923-0389-1)

Comment:

“No one should be exempt from the law. We, the public need to know what is happening with the oil industry. They have shown reckless disregard for the public health, well-being and the environment. The government must be there for its citizens and not for the greedy, uncaring industries. There will be more PB like disasters if we do not apply rigorous environmental regulations to this destructive industry.” (EPA-HQ-OAR-2009-0923-0390-1)

Comment:

“It's not Us against Them, WE are all in this TOGETHER” (EPA-HQ-OAR-2009-0923-0392-1)

Comment:

“They should have to pay for their accidents and be liable for them.” (EPA-HQ-OAR-2009-0923-0393-1)

Comment:

“Enough is ENOUGH Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-0394-1)

Comment:

“The world is watching -- and so are millions of concerned US citizens. Please do what's right!” (EPA-HQ-OAR-2009-0923-0395-1)

Comment:

“We have learned through this bitter experience in the Gulf how urgent this is. Please insist on transparency in the oil, gas, and coal industries.” (EPA-HQ-OAR-2009-0923-0396-1)

Comment:

“This is a serious matter of JUSTICE!” (EPA-HQ-OAR-2009-0923-0397-1)

Comment:

“Of course, if these rules do not apply internationally, then they are not of much value since the U.S. is not a major oil producing country. What about the Middle East, Russia, etc.?” (EPA-HQ-OAR-2009-0923-0399-1)

Comment:

“It is inconceivable to me that the oil and gas industry are not made to account for their GHG emissions and yet the EPA proposes that biomass generation, which is indisputably carbon neutral and could be in some instances carbon negative. I guess the biomass industry needs to hire better lobbyist or make more campaign contributions, i.e. legal bribes.” (EPA-HQ-OAR-2009-0923-0400-1)

Comment:

“Ban BP from any future business in the USA until after they've paid in full to clean up the mess they've made yet again. Also re-regulate the industry and this time make sure people are doing their job and not in cahoots with Big Oil!” (EPA-HQ-OAR-2009-0923-0402-1)

Comment:

“The opposition loves to claim that humans are more important than the environment, but it is time we note that humans can not live without our environment. We must breathe the air, drink the water, and consume all manner of food which comes from fresh water, oceans, air, and soil.” (EPA-HQ-OAR-2009-0923-0403-1)

Comment:

“This almost sounds like a permanent disaster. We must fix it with the best of nature and science and have no more drilling for oil in the oceans. Alternative energy is what we must count on and develop and we will also have to alter our behavior and expectations of our life style.” (EPA-HQ-OAR-2009-0923-0404-1)

Comment:

“It is long overdue that our country and the world switch to renewable electric energy. By imposing a substantial tax on oil this could stimulate private investment to ensure this takes place. The tax money could reduce the debt burden on our country and our children” (EPA-HQ-OAR-2009-0923-0405-1)

Comment:

“The BP disaster is evidence the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0406-1)

Comment:

“In addition, the lobbying the goes on in Washington that allows oil companies to get away with not following the rules on the books MUSTSTOP. It is obvious by now that these companies making obscene profits are only worried about that, their pockets, and not the environment they have so aptly destroyed in the last month, not the communities devastated by this occurrence and not the people who must do the cleanup of this toxic situation.

STOP THE MADNESS and the greed and the absolute strangle hold they have on the American public.” (EPA-HQ-OAR-2009-0923-0407-1)

Comment:

“We must hold the oil and gas companies to the EPA standards. It is getting close to the time that we are running out of chances to save our planet from ecological diaster. There is too much damage being done by the oil and gas companies right mnow.” (EPA-HQ-OAR-2009-0923-0408-1)

Comment:

“As far as I'm concerned, the EPA is already too little and too late. You have failed miserably to protect the public.” (EPA-HQ-OAR-2009-0923-0409-1)

Comment:

“As an American, I am totally over this. Enough drilling on or off shore, its now time to implement the known, for years, alternatives which will make us free from dependancy on other country's. This should have been done years ago and now we have the consequences of you not

listening. I am amazed how fast the human can destroy a country.” (EPA-HQ-OAR-2009-0923-0410-1)

Comment:

“Finally the EPA is proposing to set things right and include the offshore -- and onshore -- oil and gas industry in the reporting system.” (EPA-HQ-OAR-2009-0923-0412-1)

Comment:

“We cannot let them continue to get away with making big messes and not being penalized or cleaning them up properly.” (EPA-HQ-OAR-2009-0923-0413-1)

Comment:

“The grim, ongoing BP catastrophe in the Gulf makes it imperative that the oil and gas industry be held accountable for the human and environmental havoc their activities can wreak. Last year, the industry evaded the mandatory greenhouse gas reporting rule through extensive lobbying that kept the public in the dark about their emissions. The rule would have tracked the industry's massive global warming pollution.” (EPA-HQ-OAR-2009-0923-0414-2)

Comment:

“Some Good must come out of the Gulf oil spill disaster. That Good must be strong rules AND STRONG ENFORCEMENT of rules and regulations.

Have we made a big enough mess to now do the right thing for our planet on which we depend for life?” (EPA-HQ-OAR-2009-0923-0415-1)

Comment:

“License to drill must not mean license to pollute.” (EPA-HQ-OAR-2009-0923-0416-1)

Comment:

“It will take federal oversight to correct the abuses committed by the oil and gas industry. This cannot be left up to them to police for themselves: That just doesn't work!

How many more gulf oil spills do want?” (EPA-HQ-OAR-2009-0923-0417-1)

Comment:

“The oil and gas industry (not just BP) must be held accountable.” (EPA-HQ-OAR-2009-0923-0418-1)

Comment:

“Crack down on them as they have been too sloppy ! Hold their "feet the the fire"" (EPA-HQ-OAR-2009-0923-0419-1)

Comment:

“BP is a disaster waiting to happen. PLEASE, rein in the oil companies while we still have a planet. There is no planet B.” (EPA-HQ-OAR-2009-0923-0420-1)

Comment:

“Polluters should not be able to conceal their environment-destroying activities from the public. We have a right to know so we can insist that they stop and discontinue using their products until they do.” (EPA-HQ-OAR-2009-0923-0421-1)

Comment:

“How arrogant to think we can mess with oil extraction under the ocean and not eventually have a royal disaster. Much like nuclear power I'd say. Just a matter of time. And 'clean-ups' are such a misnomer. Not possible!” (EPA-HQ-OAR-2009-0923-0422-1)

Comment:

“We heartily favor EPA's proposal to include offshore and onshore oil and gas operations under the greenhouse gas reporting rules. The o/g industry produces huge quantities of emissions that promote global warming. If anybody should be required to report those emissions, the oil/gas industry should.” (EPA-HQ-OAR-2009-0923-0423-2)

Comment:

“My uncle spent his career as a drilling boss on offshore oil rigs, starting in California and later working around the world. So the oil industry has certainly played its part in our family. But we think they should be subject to the reporting rule the same as other industries.” (EPA-HQ-OAR-2009-0923-0423-3)

Comment:

“Please require rigorous, direct pollution measurements, and bring the oil/gas industry under this reporting system as soon as you can.” (EPA-HQ-OAR-2009-0923-0423-5)

Comment:

“Don't you think it's about time to stop passing the buck?” (EPA-HQ-OAR-2009-0923-0424-1)

Comment:

“IF GOVERNMENT FAILS TO PROTECT US BY PROTECTING THE POLLUTERS THEN GOVERNMENT HAS FAILED US.” (EPA-HQ-OAR-2009-0923-0425-1)

Comment:

“THEY MUST PAY FOR THEIR LACK OF PREPARATION, CUTTING CORNERS, AND TERRIBLY DAMAGING POLLUTING OF THE ENVIRONMENT. GET TRANSPORTATION OFF THE PETROLEUM DIET NOW. USE PETROLEUM ONLY FOR VALUABLE NEEDS, NOT FOR TRANSPORTATION.” (EPA-HQ-OAR-2009-0923-0426-1)

Comment:

“We need to hold all gas and oil companies, no matter where they are based or owned, and hold them totally accountable for all present and possible future damages that they have caused to our environment.” (EPA-HQ-OAR-2009-0923-0427-1)

Comment:

“i am a marine engineer by trade, if i spill just a few hundred gallons of oil while taking on fuel and i am talking about diesel here, a product that is easier on the environment in small quantities and cause a film or emulshion uppon or in the water the water i could very well and rightfully so loose my licence and be wiped out financhally. there are basicley by virtue of the cost of jail and fines and livence removal no limits that i could be punished i am heavley regulated so i dont take chances, because of the regulations the chances of spilling is much less. i for one dont care how much it costs to drill SAFELY in the ocean but NEVER under any conditions should a company like BP or any other company american or multinational with no national home in this world that they pay taxes to be able to pull something that could make the 9-11 attack on the world trade center look like childs play peroud! if it is too expensive to drill SAFELY then dont drill! the supprime court says corporations are people... this one should do time for life plus 30 years it belongs to america now we are going to have to atempt to clean up there fricking mess!” (EPA-HQ-OAR-2009-0923-0428-1)

Comment:

“This is a heartbreaking disaster that impacts all of us, all animals, all plants, all fish, all Gulf industries. It should never have happened - ever.” (EPA-HQ-OAR-2009-0923-0429-1)

Comment:

“I also urge you to ban them from spraying any more dispersant. This has completely ruined the ability to clean it up! It's all underwater now! How can we manage it now?” (EPA-HQ-OAR-2009-0923-0431-2)

Comment:

“Thank you for your time and attention to this matter.” (EPA-HQ-OAR-2009-0923-0432-1)

Comment:

“The EPA is supposed to protect our environment. It hasn't been doing a very good job as we've all seen. It's time to turn things around and give us the change we can believe in that we've heard so much about but have yet to see. Industry should not have any more rights than an individual” (EPA-HQ-OAR-2009-0923-0433-1)

Comment:

“WHEN is this INSANITY going to end??? WHEN are we going to "come to our senses" and PUT THE WELFARE OF OUR PLANET, ITS CITIZENS, AND THEIR FUTURE GENERATIONS, AHEAD OF THE GREED OF THE HUGE, RAPACIOUS CORPORATE INTERESTS??????

WHEN ARE YOU GOING TO PUT AN END TO THIS BEFORE IT PUTS AN END TO US????????????” (EPA-HQ-OAR-2009-0923-0434-1)

Comment:

“As far as I am concerned, equivocation and diddle dalling about fixing responsibility for these incredible environmental disasters is over. The gulf disaster is just one of the dozens of 'blowouts in the gulf. There were dozens of blowouts in the gulf though none as disasterous as this horrendous one. I track individuals and organizations that obfuscate, distroy, and mitigate responsibility for these awful disasters and desiminate them as far and wide as I can.

I would also like you to reinforce the federal discontinuing the vast bailouts and payments to the oil and gas industries in all there nefarious forms. It takes millions of people like me on my level and powerful people like you to make the changes in the world that will save it for our children and grandchildren.

Please, Please, "Do this".” (EPA-HQ-OAR-2009-0923-0435-1)

Comment:

“OK..., NOW maybe y'all will pay-attention and hold 'big-oil' responsible for their pollution. The latest promises to destroy an entire body of sea-water that helps support regions that are NOT United States property. We have NOW become polluters of the entire planet., for all to see. Tighten-up and act-right! DO IT NOW. No more money-lobbying (cause that's what it is) their way out-of trouble any more. THIS SHIT STOPS NOW.” (EPA-HQ-OAR-2009-0923-0436-1)

Comment:

“In light of the environmental disaster int he Gulf, please ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0438-1)

Comment:

“Taxpayers can no longer afford to subsidize oil company profits by assuming the environmental costs associated with their careless practices. It's time that we held these billion dollar corporations accountable for the damage they are doing to our planet. And now our Gulf Coast. As their profits grow, the Earth suffers.” (EPA-HQ-OAR-2009-0923-0439-1)

Comment:

“Clearly we should have learned by now that our government has for too too long given the oil/gas industry excess freedom from oversight and regulation.” (EPA-HQ-OAR-2009-0923-0440-2)

Comment:

“I used to be a faithful BP customer, but I've now changed my ways. Last week I drove an extra 15 miles on a very low tank to find a gas station that was not BP. I get sick to my stomach when I think about the oil industry's failure to have a solutions for such emergencies. There's not one oil company that we can actually feel good about, is there?” (EPA-HQ-OAR-2009-0923-0441-1)

Comment:

“This could also happen again at any time. Just as you cannot leave a two-year old alone, so we cannot leave our super-wealthy alone without them destroying either our economy or the planet. This is the job of government.

I am almost afraid to ask, but has anything been done to check other offshore oil rigs?” (EPA-HQ-OAR-2009-0923-0442-1)

Comment:

“I do not feel however that the EPA is much of a threat to these companys and will not be able to achieve much. I say this because of the current request from the EPA to BP to stop using the chemical spray over the oiled water has fallen on deaf ears. So, it is my assumption that the EPA has no power and no respect or maybe they are in cohorts with the oil company.” (EPA-HQ-OAR-2009-0923-0443-1)

Comment:

“No industry, or individual, should be freed of the responsibility, physical and economic, for monitoring the excesses of their actions and taking proper steps to completely eliminate the problems which they have created.” (EPA-HQ-OAR-2009-0923-0444-2)

Comment:

“Every American citizen is held responsible for his or her actions. Why aren't the big oil corps held responsible for theirs. They have been granted personhood, hold them accountable as persons are.” (EPA-HQ-OAR-2009-0923-0445-1)

Comment:

“How many animals, birds, fish and eco systems need to be destroyed before Big Business is held accountable?? We can not keep destroying our own home.” (EPA-HQ-OAR-2009-0923-0446-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf over the 40 days previous, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0447-1)

Comment:

“I pray urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0447-2)

Comment:

“Every day it becomes more apparent that BP has put profit before purpose. Every day it becomes clearer that BP is in over its head. Every day this obviously avoidable disaster grows exponentially worse. BP clearly has no clue how to stop the disastrous leakage of oil they have wrought. And apparently neither does anyone in the industry. How is it possible in the twenty-first century that such an undertaking could be even imagined without being pretty darn sure that all contingencies were accounted for? BP (as example, not exception) has gone blindly ahead with their extraction technology without even attempting to update forty year old disaster response technology. This latest disaster may signal that it's already too late, but isn't it high time we at least look like we're learning something from this?” (EPA-HQ-OAR-2009-0923-0448-1)

Comment:

“QUICK- DO THE RIGHT THING BEFORE CORP. POWER REARS ITS UGLY HEAD AGAIN IN THE USA- KEEP UP THE GOOD WORK!” (EPA-HQ-OAR-2009-0923-0449-1)

Comment:

“Who are the terrorists?” (EPA-HQ-OAR-2009-0923-0450-1)

Comment:

“Who are the enablers and who are the terrorists?” (EPA-HQ-OAR-2009-0923-0450-3)

Comment:

“The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0451-1)

Comment:

“The EPA is our single best agency to assure that businesses operate in a manner which ensures our safety and complies with environmental regulations.” (EPA-HQ-OAR-2009-0923-0451-2)

Comment:

“In addition, all offshore oil rigs should put in place relief wells, which are mandated in countries such as Canada. This should be required BEFORE new start-ups and construction of relief wells should be required to begin immediately for existing wells!” (EPA-HQ-OAR-2009-0923-0452-1)

Comment:

“Profit is not more important than people. Corporations must be under regulations that require complete transparency of any pollution - and importantly - greenhouse gas pollution. We need to know what poisons and pollution the corporations are spewing into our world. People are more important than profit.” (EPA-HQ-OAR-2009-0923-0453-1)

Comment:

“Stop selling out to this most destructive industry! And insist that we as a nation turn away from old technology that is destroying our planet and towards RENEWABLE sources!!” (EPA-HQ-OAR-2009-0923-0454-1)

Comment:

“We can no longer afford, as a people, to misuse, abuse and neglect our resources, land, and planet. Irreparable conditions will result if changes are not made now. We are all connected thus are responsible for each other. Do your part.” (EPA-HQ-OAR-2009-0923-0455-1)

Comment:

“Our local refineries are required to report emissions within a very short and strict time frame. Big oil should have to meet the same standards that are required for other companies. No more exemptions for big oil, it is time for proper regulation.” (EPA-HQ-OAR-2009-0923-0456-2)

Comment:

“Common sense dictates that the massive oil and gas industries be subject to rigorous global warming pollution emission controls for the sake of all of us.” (EPA-HQ-OAR-2009-0923-0457-1)

Comment:

“Gambling with the Environment is not worth the risk. How dare the big Corporations conduct 'business as usual' without consequences. Since the Supreme court recently ruled that

Corporations have the same rights as individuals, they should be punished as any individual would be for crimes against our children's future,” (EPA-HQ-OAR-2009-0923-0458-1)

Comment:

“Hold the oil and gas industry accountable for all actions, all pollution onshore and offshore.” (EPA-HQ-OAR-2009-0923-0459-1)

Comment:

“It's obvious to me that criminal negligence has become the norm in this industry. Bring these people to justice NOW!” (EPA-HQ-OAR-2009-0923-0460-1)

Comment:

“We strongly support the position of the Sierra Club and other environmental organizations in these efforts.” (EPA-HQ-OAR-2009-0923-0461-1)

Comment:

“The oil and gas industry must be held accountable. Offshore – and onshore -- oil and gas industry need to be included in the EPA mandatory greenhouse gas reporting rules, which would have tracked its massive global warming pollution emissions. I strongly support that decision. Enough is enough, Please make sure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0462-1)

Comment:

“Due to the disaster happening in the Gulf, we have learned everything watching the horrendous BP disaster unfolding in the Gulf, and it's the total responsibility that the oil and gas industry must be held severely accountable now and in the future.” (EPA-HQ-OAR-2009-0923-0463-1)

Comment:

“I demand that you do so and I urge you to ensure that the system uses extremely rigorous, detailed, accurate direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

Furthermore I urge you to strongly support rejection of any decisions to continue drilling in the ocean to never allowing them to happen again so we don't keep up having all these destructive

disasters and then we can save the fishing industry, wildlife and coastal businesses.” (EPA-HQ-OAR-2009-0923-0463-2)

Comment:

“I am so fed up with lobbyists and a congress that bends to their will. This must stop. My elected officials need to do what is best for me not big business.” (EPA-HQ-OAR-2009-0923-0464-1)

Comment:

“This latest catastrophe should also tell us that it is high time we get away from our dependency on oil!” (EPA-HQ-OAR-2009-0923-0465-1)

Comment:

“It is well past time for all the exceptions, special cases, and claims of mitigating circumstance or "Critical industry" to cease making a sham of the rules governing all of the 'normal' population.

Lets enforce the Environmental regulations evenly. If there are to be exceptions, they should be exceptions (applied for and allowed on a case by case basis, with rigorous examination and public review) and not be the norm. An exceptions should also expire with the situation that warranted it and not exist in perpetuity” (EPA-HQ-OAR-2009-0923-0466-1)

Comment:

“Please do everything in your power to protect and preserve our wildlife and resources. Thank you.” (EPA-HQ-OAR-2009-0923-0467-1)

Comment:

“Accountability need first exist with a safety plan, a plan of immediate and successful intervention in the case of failure/disaster. BP never had one, BP was never required to. How is it that technology is allowed to run wild with no checks and balance, no escape plan? Accountability...” (EPA-HQ-OAR-2009-0923-0468-1)

Comment:

“Business gets rich and we pay in every way.” (EPA-HQ-OAR-2009-0923-0469-1)

Comment:

“Steps should be taken to assure this never happens again. Those that vote will weed out the non-believers.

Your children and grandchildren deserve what we got to see without all the tar balls, killing of the seas and that in then that help left us running id slowly bein destroyed by grees and inaction by the companies reaping the profits. and anxiety involved.” (EPA-HQ-OAR-2009-0923-0470-1)

Comment:

“Clearly, this can no longer be a game of hide and seek. Millions of lives and entire ecosystems are at stake. If companies in the oil and coal industries continues to flout the rules and evade regulations and deny science and thwart the will of the people, then THEY DESERVE TO BE OUT OF BUSINESS. The privilege of doing business in a democratic republic where the rule of law is paramount is that people and corporations must live and work according to rules. Laws are rules. Regulations make sure the laws are abided by. When oil and coal companies avoid regulations they are avoiding behavior that is made mandatory by law. This is not their country; they do not set the rules. If they avoid regulations that require proper reporting, they have broke the rule of law, and should no longer be able to hide behind their lobbyist mouthpieces and enablers in Congress.” (EPA-HQ-OAR-2009-0923-0471-1)

Comment:

“The oil and gas industry MUST BE HELD ACCOUNTABLE!” (EPA-HQ-OAR-2009-0923-0472-1)

Comment:

“No more lost lives, environment, sickened person, dead animals birds and fish and reined ocean environment--which are beond price.” (EPA-HQ-OAR-2009-0923-0473-1)

Comment:

“I have a 16 month old daughter, and she has a right to grow up with clean air and water. The right to visit the Gulf region (as I have) and take in its beauty and its bounty and this might not be possible with the ongoing disaster. Please make it possible for her to enjoy other regions of this great country by regulating the Oil and Gas industry, it is obvious that they cannot do it themselves. I expect nothing less from the EPA.” (EPA-HQ-OAR-2009-0923-0474-1)

Comment:

“It should also be clear that the agencies still suffer from Bush attitudes; Enough already--please clean house so we can clean up the county.” (EPA-HQ-OAR-2009-0923-0475-1)

Comment:

“How are we going to solve the global warming crisis if we bury our heads in the sand by ignoring inconvenient truths. I am depending on the EPA to protect the environment and make up for years of past neglect.” (EPA-HQ-OAR-2009-0923-0476-1)

Comment:

“Thank you for your time and attention to this matter.” (EPA-HQ-OAR-2009-0923-0477-1)

Comment:

“This is a good and important start toward a regulatory system that holds the industry accountable and ensures, beyond a shadow of a doubt, that corporate industry will no longer place the health of the planet itself in jeopardy.” (EPA-HQ-OAR-2009-0923-0478-1)

Comment:

“Big Oil's earnings are incredible. Hold them accountable. Let us get to safer ways to produce clean energy.

Why is there not a simpler way to traverse out cities without cars and buses? Let us get out of our cars.” (EPA-HQ-OAR-2009-0923-0479-1)

Comment:

“I am sickened by what I see unfolding in the Gulf of Mexico as an entire ecosystem teeters on the verge of irreversible damage. Recent revelations about safety concerns raised well before the explosion and collapse of the oil rig make it clear that much more rigorous monitoring and regulation of the oil and gas industry is needed.” (EPA-HQ-OAR-2009-0923-0480-1)

Comment:

“This issue is very important to me.” (EPA-HQ-OAR-2009-0923-0481-1)

Comment:

“How can you people NOT let them be held accountable for their actions!!!! All of us that have "meanial" jobs are held responsible for our actions and end up getting fired with no problem! I am in AFC and I can tell you if there was a mistake or if something happens in my care I would be up for punishment and would not be allowed to keep my license! You let people that have MAJOR impact on the world get by with all sorts of things and now look at what has happened!!!! They can't even correct the problem and they should have had a plan in place BEFORE this had even happened!!!! People, it is time you used your heads and hold these and others accountable that have a major impact on this world! They are wrecking MY WORLD through your people's ignorance... 6 weeks and what have they done???? Total ignorance!!!!!!And STUPIDITY!!!!!!! Very disgusting , and they sit with big pocket books and having fun with their \$\$\$\$\$ while we have to sit and watch our beautiful world go to HELL.... THINK PEOPLE ABOUT SOMETHING OTHER THAN \$\$\$\$\$\$\$\$\$!” (EPA-HQ-OAR-2009-0923-0482-1)

Comment:

“It seems that we are crisis orientated, and now we have the crisis to orientate us. Let's do it now.” (EPA-HQ-OAR-2009-0923-0483-1)

Comment:

“The people across this nation are behind you. Please make it right.” (EPA-HQ-OAR-2009-0923-0483-2)

Comment:

“no bail outs for BP make them pay to clean this up...and it's going to cost billions over decades lets not kid ourselves about that.” (EPA-HQ-OAR-2009-0923-0484-1)

Comment:

“BP, Haliburton, Transocean and all those that have manipulated US to keep US dependant on dirty, dangerous, exploitative energy and all those that obstruct green energy solutions and jobs, owe humanity and the environment for generations to come.” (EPA-HQ-OAR-2009-0923-0485-1)

Comment:

“bThe point is not to shut down the oil and gas industry - rather, the point is to hold that industry to the same standards of accountability as other industries are held. This necessary decision is not an anti-oil and gas decision- it is a pro-environment decision. And finally, this decision is really

not discretionary - It is a must! The EPA will either choose TO DO what must be done, or it will choose NOT TO DO what must be done. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0486-1)

Comment:

“As we watch the oil spill tragedy unfolding in the Gulf, how can we think otherwise than to hold BP accountable?” (EPA-HQ-OAR-2009-0923-0487-1)

Comment:

“Big Oil makes billions off our resources and then expects US to pay to clean up THEIR messes: NO WAY!” (EPA-HQ-OAR-2009-0923-0488-1)

Comment:

“The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0489-1)

Comment:

“Letting big business polluters off without maximum penalty would be inexcusable! Their FIRST priority should have been PREVENTION, not clean-up or dispersing the oil or media campaigns.” (EPA-HQ-OAR-2009-0923-0490-1)

Comment:

“As an American, I am tired of bearing the costs of the oil industry without sharing in the benefits, while a few become enormously rich. The latest BP disaster is a perfect example. It should have been obvious this was waiting to happen by the nature of the engineering problems they were confronting in extracting oil from such depths.” (EPA-HQ-OAR-2009-0923-0492-1)

Comment:

“The ongoing BP disaster will have long term effects upon our country and every one of our citizens. The fact that they did NOT have every possible safeguard in place, that they were NOT mandated to do so put us all in danger and now we will pay the price. Their present inability to shut down this disaster clearly shows the potential for incidents like this to happen again.

BP, EVERY oil producer MUST be made to operate under strict regulations, ones that will ensure that they in no way pollute our environment in ANY MANNER. BP and every oil

producer MUST be held accountable and mandated to pay to the very last penny for ANY damage, the clean-up and remediation of situations such as the ongoing catastrophe connected with their operations.” (EPA-HQ-OAR-2009-0923-0493-1)

Comment:

“It is past time to get rid of Bush and Cheney's cronies that are raping this country. Now it is Obama's problem because he didn't take action on day one to remove the industry's people in government. Stop this madness. Stop destroying our world for the benefit of a few CEO's that need to be put in jail.” (EPA-HQ-OAR-2009-0923-0494-1)

Comment:

“The spill will eventually threaten large areas of the Eastern Seaboard. Act before it is too late to stop another such disaster.” (EPA-HQ-OAR-2009-0923-0495-1)

Comment:

“This is a GREAT OPPORTUNITY to gain awesome positive strides in balancing our planet's environment in order to ensure our's and Mother Earth's Health !!!!” (EPA-HQ-OAR-2009-0923-0496-1)

Comment:

“I work in these industries and I know what they do.” (EPA-HQ-OAR-2009-0923-0497-1)

Comment:

“My goal is not to penalize past behavior, although that may happen. My goal is to change behavior for the future. Transparency, education, auditing and enforcement is not anti business.” (EPA-HQ-OAR-2009-0923-0498-1)

Comment:

“I'm so disappointed that our government would allow short-term interests to come before the safety of this country. I'm so embarrassed that the most powerful country in the world allows this kind of incompetence.” (EPA-HQ-OAR-2009-0923-0499-1)

Comment:

“The oil and gas industry has had too many exemptions, they have gotten drilling permits without proper review procedures and do not use environmentally safe methods of extracting gas and oil. They are operating purely on the profit motive and the government has left them do whatever they want without any oversight or restrictions and on public lands. They need to be held accountable and to pay, money is the only thing they understand and we need to hit them where they will notice it and change their practices” (EPA-HQ-OAR-2009-0923-0500-1)

Comment:

“As a resident of Florida and an owner of property in the middle of possible Marcellus Gas Drilling in New York State, I am very concerned about "oil and gas disasters." Both are dangerous and have not been regulated enough to protect not only the environment but the American people.” (EPA-HQ-OAR-2009-0923-0501-1)

Comment:

“The events of the last few weeks are a clear demonstration that industry policing industry results in environmental catastrophe.” (EPA-HQ-OAR-2009-0923-0502-1)

Comment:

“It is your job to protect citizens and the habitat we live in from the corporations. It is not your job to grant corporations immunity from the consequences of their destructive practices. Do your job.” (EPA-HQ-OAR-2009-0923-0503-1)

Comment:

“If we don't make sure that the oil companies are accountable for their actions they will continue to defile the earth. Where will we live?” (EPA-HQ-OAR-2009-0923-0504-1)

Comment:

“It is time to stop coddling Big Oil.” (EPA-HQ-OAR-2009-0923-0505-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0506-1)

Comment:

“In addition, I am just reading this article below, and I am very concerned about this toxic solvent which BP is using. Can something be done to stop their use of this immediately? Thank you for your time and consideration.

Oil spill threatens 'total destruction' <http://www.presstv.ir/detail.aspx?id=128113&ionid=3510203>
The British Petroleum oil spill is threatening the entire eastern half of the North American continent with "total destruction," reports say.

An ominous report by Russia's Ministry of Natural Resources warned of the impending disaster resulting from the British Petroleum (BP) oil and gas leak in the Gulf of Mexico, calling it the worst environmental catastrophe in all of human history, the European Union Times reported.

Russian scientists believe BP is pumping millions of gallons of Corexit 9500, a chemical dispersal agent, under the Gulf of Mexico waters to hide the full extent of the leak, now estimated to be over 2.9 million gallons a day.

Experts say Corexit 9500 is a solvent four times more toxic than oil. The agent, scientists believe, has a 2.61ppm toxicity level, and when mixed with the warm waters of the Gulf of Mexico, its molecules will be able to "phase transition."

This transition involves the change of the liquid into a gaseous state, which can be absorbed by clouds. The gas will then be released as "toxic rain" leading to "unimaginable environmental catastrophe" destroying all life forms from the "bottom of the evolutionary chart to the top," the report said.” (EPA-HQ-OAR-2009-0923-0506-2)

Comment:

“Watching the grim BP disaster unfolding in the Gulf is the clearest message possible that not only must the oil and gas industry be held accountable but that offshore drilling is a catastrophe waiting to happen.” (EPA-HQ-OAR-2009-0923-0507-1)

Comment:

“The Mega oil spill did not just happen! BP already had a record of multiple oil spills in Prudoe Bay in Alaska. I understand that these leaks are still continuing.

They also had a history of multiple inadequate fines for multiple repeated breaches of safety. The latest, more significant at \$85 Million, they are challenging in Court, but even this fine is not enough to phase them with their increased income of 30%.

Thanks to the endemic bribery and corruption of Congress, which reached its peak under the tender care of G.W.B., every Corporate business was given a free ride for abuse, exploitation,

total vacation of safety precautions, unlimited opportunities for evasion of the law and Constitution and multiple donations of taxpayers' money.

The Deep Horizon was just an experiment, not carefully thought out, and with no provision for safety such as the valve employed by Norway. A potential Mega spill was not even contemplated, let alone prepared for.

I have been proposing a potentially successful method for stopping the spill which would reduce the pressure of the spill, rather than increasing it, as the stuffing of the hole with mud or cement would do. Very unsurprisingly this method failed! Such a tactic is like trying to keep the fizz in a champagne bottle by stuffing the neck of the bottle with a rag. Predictably the rag would hit the ceiling!

I have sent my proposal to multiple sites, but so far no one has replied or shown any interest!

It is time to stop trusting congenital profiteers and take the needed steps to protect our people instead of the profiteers!" (EPA-HQ-OAR-2009-0923-0508-1)

Comment:

"No person in his right mind can now support all that random, unsupervised a drilling." (EPA-HQ-OAR-2009-0923-0509-1)

Comment:

"If we Americans learn nothing from the BP disaster in the Gulf of Mexico, we will have to call ourselves "ignoramuses."

Foremost, we should be learning that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0510-1)

Comment:

"As a professional marine biologist watching the grim BP disaster unfolding in the Gulf, it is clear to me that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-0511-1)

Comment:

"It is past time to have laws that protect our environment and BIG OIL cannot lobby its way out of being held accountable for a HUGE disaster they said would never happen, HA..." (EPA-HQ-OAR-2009-0923-0512-1)

Comment:

“Not only should it be accountable for emissions but for their inability to ensure safety in their operations.” (EPA-HQ-OAR-2009-0923-0513-1)

Comment:

“The oil and gas industry must be held accountable for its actions and its inactions.” (EPA-HQ-OAR-2009-0923-0514-1)

Comment:

“Can we, the citizens, please have our government back?” (EPA-HQ-OAR-2009-0923-0515-1)

Comment:

“Please include the offshore and onshore oil and gas industry in pollution emissions including greenhouse gasses.” (EPA-HQ-OAR-2009-0923-0516-1)

Comment:

“It would be criminal not to hold those responsible accountable, we must change our energy policies and stop the greed that dominates our political and business world.” (EPA-HQ-OAR-2009-0923-0517-1)

Comment:

“It is critical that the oil industry through lobbying and payoffs not be granted waivers on the existing laws. If the, environmental laws were strictly enforced and not left up the BP, plus if the people who warned of the possible dangers in 13 well cites were listened to, this would never have happened. Greed and pandering and non enforcement of good laws and regulations are aiding in destroying our country. We do not need more government regulations and more agencies tripping over each other. STOP THE FOX FROM WATCHING THE HEN HOUSE.” (EPA-HQ-OAR-2009-0923-0518-1)

Comment:

“Please do not allow the energy industry to destroy our planet as they pretend to help us live safely on it.” (EPA-HQ-OAR-2009-0923-0519-1)

Comment:

“IT IS DRAMATICALLY CLEAR THAT OIL AND GAS LOOPHOLES HAVE GOT TO GO -NOW!!” (EPA-HQ-OAR-2009-0923-0520-1)

Comment:

“Thanks for your attention to what must be difficult issues.” (EPA-HQ-OAR-2009-0923-0521-1)

Comment:

“Enough is enough. Put the clamps on big oil and stop all the pollution.” (EPA-HQ-OAR-2009-0923-0522-1)

Comment:

“The industry has already received environmental exemptions that have caused harm to the public and the environment and it is time to hold them accountable!” (EPA-HQ-OAR-2009-0923-0523-1)

Comment:

“For far too long we have stood by as big industry ran roughshod over all of us and we have to bail them out and/or clean up their messes: GM, Lehman Bros, Goldman Sachs, AIG, Bear Stern, Tyco, Enron, MCI, EXXON, etc, etc, etc. Now BP. I've had enough of this BS. Big business has demonstrated time and again their only motive is profit, not jobs, the economy, the country; it's all about greed for them. Through their incompetence we all are held back from progress both economic and environmental. Now is the time to tighten the screws on regulation to get U.S. industry back to the tenets of responsibility. Isn't that what all the conservatives always are calling for? Individual responsibility over Gov't programs? Seems their argument is quite hollow these days.” (EPA-HQ-OAR-2009-0923-0524-1)

Comment:

“I want EPA to execute all its power to do the job we created it to do without any political fetters. You have my support to fully ensure the environment is protected and recovers.” (EPA-HQ-OAR-2009-0923-0524-2)

Comment:

“If anything of value can come out of the BP oil spill, it should be to make sure that nothing like this can ever happen again and that all industry practices should be transparent and regulated to protect the American people and the earth.” (EPA-HQ-OAR-2009-0923-0525-1)

Comment:

“How many times do we have to have disasters before we wake up and realize that we have destroyed parts of our earth and nature that cannot be replaced?!” (EPA-HQ-OAR-2009-0923-0527-1)

Comment:

“If not now then when are we going to hold them accountable?” (EPA-HQ-OAR-2009-0923-0528-1)

Comment:

“Thank you for your attention to this most urgent matter.” (EPA-HQ-OAR-2009-0923-0529-1)

Comment:

“This is absolutey appalling! When is the EPA going to do the job it's supposed to be doing. Please stop letting the special interests destroy our environment in the name of their greed.” (EPA-HQ-OAR-2009-0923-0530-1)

Comment:

“Who knows how long the oil will continue to gush out into the gulf. this is the worse disaster ever in the US, and nobody can predict how it will effect the economy and the health of the nation for years to come. There should be the strictest system of oversight and accountability imposed on the oil and gas industries.” (EPA-HQ-OAR-2009-0923-0531-1)

Comment:

“These cubic mile sized underwater "clouds" of dispersed petroleum are a danger whose extent is really unknown. Big oil is hiding that.” (EPA-HQ-OAR-2009-0923-0533-1)

Comment:

“LISA JACKSON: I really do think that you are doing a wonderful job in the face of 8 plus years of the Bush/Cheney rape of America's natural resources. HOWEVER, what the "lobbioffso" (noun: 2010 etymology based on lobbyist and maffia or maffioso) and the incredibly insane climate deniers are doing is analogous to the story of Croesus and the oracle of Delphi. (i.e.) if you stay on the path you are on, a great nation will fall.) This is good advice for all legislators to ruminate on for a while too. IF, Lisa Jackson, you are not able to thwart and pummel these forces

of greed and avarice, through closing of that LOOPHOLE, then I truly do despair, AND the EPA (will forever after) be know as ENVIRONMENTAL POLLUTER ACCOMPLICES!" (EPA-HQ-OAR-2009-0923-0534-1)

Comment:

“Mr. Jackson, the EPA must remain in charge and increase its vigilance. None of us has voted to sale our body and soul to oil corporations, yet they act as if they owned the earth with all its living creatures, and can dispose of them at will. If we care to give a living chance to our children and grand children, these corporations need to be curbed.” (EPA-HQ-OAR-2009-0923-0535-1)

Comment:

“Please do everything you can to insure that BP is held responsible for the disaster in the GOM .. it makes me want to cry every time I read an article about the "spill".” (EPA-HQ-OAR-2009-0923-0536-1)

Comment:

“I support this decision also, because I still believing that " if you are not part of the solution, no doubt that you are part of the problem".” (EPA-HQ-OAR-2009-0923-0537-1)

Comment:

“Stricter enforcement is necessary if we are to have air suitable to breathe. Currently, my state, Texas, has violated every guideline.

This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. Exxon-Mobil alone spends seven times more on deep water off-shore drilling research than it spends on renewable energy sources. This gives you some idea of how concerned the largest U.S. oil company is about the environment.

I strongly support stricter offshore and onshore drilling limits.” (EPA-HQ-OAR-2009-0923-0538-1)

Comment:

“I am someone who has lived in Louisiana and I continue to watch the continuing and unfolding environmental and wildlife effects that are due to the oil spill disaster in the Gulf of Mexico -

which is not stopped yet!” (EPA-HQ-OAR-2009-0923-0539-1)

Comment:

“The effects on wildlife and the environment from this oil spill in the Gulf of Mexico in the state of Louisiana and all along the gulf coast will takes years to correct and recover from, to allow these states to emerge back to vibrant ecosystems.” (EPA-HQ-OAR-2009-0923-0539-2)

Comment:

“Do we want to be known, to future generations, as the generation that facilitated Planet Earth's demise and that of our own species. With our reckless destruction of the oceans, and its inhabitants, with our pollution of the air we breathe, with our depletion of our protective ozone layer - AND FOR WHAT.

This generation, more than any other, has abdicated all responsibility to future generations for an inhabitable planet. Let us reconsider our options before it is too late! ! !” (EPA-HQ-OAR-2009-0923-0540-1)

Comment:

“To address global warming we must address the sources of greenhouse gas pollution and change our energy system from one based on fossil fuels to one that is not. The oil and gas industry resists both of these necessary steps.” (EPA-HQ-OAR-2009-0923-0542-1)

Comment:

“Oil companies should not be allowed to drill anywhere until they develop technology assuring safety of the drill and have a sound and save method to clean oil spills. It is too risky to health of the people, sea creatures and ocean ecosystems to exploit oil without any proven sound and safe methods in preventing and overcoming disasters.” (EPA-HQ-OAR-2009-0923-0543-1)

Comment:

“Hold BP responsible for all damages!” (EPA-HQ-OAR-2009-0923-0544-1)

Comment:

“That is completely wrong and unacceptable. Loopholes like this impede crucial progress towards bringing the Earth to a clean, balanced, and liveable place for all. In this case, lobbyists are unethical and sleazy and should be shown the EXIT sign in the corridors of government.

WHY are our legislators allowed to listen to them? Because.....they too are unethical?" (EPA-HQ-OAR-2009-0923-0545-1)

Comment:

“The EPA exists to protect our environment. Period. Although naturally resilient, our environment cannot withstand the egregious assault by corporations for the purpose of making a profit. Our entire ecosystem is in danger - particularly from the oil and gas industry - and needs your oversight, regulation and control.” (EPA-HQ-OAR-2009-0923-0546-1)

Comment:

“Please begin leveling the playing field between newer, cleaner energy alternatives and the oil industry. Loopholes, subsidies, and information hidden but relative to each alternatives' attributes make the oil and coal industry's 'benefits' seem larger than they really are.” (EPA-HQ-OAR-2009-0923-0547-1)

Comment:

“When will the BP, MMS & Haliburton Execs & Management, and those in the EPA and US Government who have let all these MASS MURDER & MASS ECOCIDE perpetrators continue....over and over and over, all over the PLANET? It is LONG OVERDUE that these criminals be THROWN IN PRISON..... AWAITING A SOLUTION TO THEIR TRIALS....AFTER THIS DISASTER HAS BEEN STOPPED! THE WORLD IS WELL AWARE THAT THERE HAS NEVER BEEN TECHNOLOGY TO FIX A DISASTER LIKE THIS, there has only been PROFIT MARGINS! NO MORE DRILLING in ANY WATERS EVER AGAIN!” (EPA-HQ-OAR-2009-0923-0548-1)

Comment:

“If special interest groups did not control the White House, oil might not be killing all the wildlife in the Gulf right now. Let's put it right and put control of drilling and spilling back in the hands of our government. Hold BP accountable for ALL the damages to the jobs and ecosystem in the Gulf.” (EPA-HQ-OAR-2009-0923-0549-1)

Comment:

“I have to clean up after myself. I teach my children to clean up after themselves. Oil companies must be 'taught' to clean up after themselves.” (EPA-HQ-OAR-2009-0923-0550-2)

Comment:

“For too long the oil and gas industry have been able to manipulate laws and rules so that the extent of the damage they are doing is not measured and publicized. At last there is a chance that we can end this impunity. Please act to protect our environment - at last!” (EPA-HQ-OAR-2009-0923-0551-1)

Comment:

“No loopholes for favored players!” (EPA-HQ-OAR-2009-0923-0552-1)

Comment:

“This is such a tragedy for the environment. Please do all you can to help lead us toward a safer cleaner future.” (EPA-HQ-OAR-2009-0923-0553-1)

Comment:

“This is an opportunity to implement forward thinking policy. There would be a lot of public opinion behind a decision to transition to CLEAN technology and to hold the greedy, energy industry accountable for ALL of the costs of doing business. It is time to STOP corporate welfare.” (EPA-HQ-OAR-2009-0923-0554-1)

Comment:

“Be strong and stand up to the corporate interests. For too long the government has let the fox guard the hen house. We see where that has led us. Stand up for the people.” (EPA-HQ-OAR-2009-0923-0555-1)

Comment:

“Please have the courage to continue to build EPA's honesty, integrity, and strength in the face of the oil industry's dirty tactics.” (EPA-HQ-OAR-2009-0923-0556-1)

Comment:

“Thank you for all your efforts on behalf of Environmental Protection, which is now understood to have truly global implications.” (EPA-HQ-OAR-2009-0923-0557-1)

Comment:

“It has never been more important to know the true costs of every aspect of energy production.”
(EPA-HQ-OAR-2009-0923-0558-1)

Comment:

“It's time to decide who is running this country, the government or big oil. If BP had invested all the money it is going to cost them (assuming you hold them accountable for the disaster in the gulf) in alternative energy sources, we might actually be closer to using wind or solar power. We the people are watching to see how this plays out, if you will hold BP responsible or if you will allow them to weasel their way out of this and attempt to pass this on to the taxpayers.” (EPA-HQ-OAR-2009-0923-0559-1)

Comment:

“The scientific evidence that civilization as we have known it--and indeed, all planetary life--is sustainable ONLY @ 350 PPM is irrefutable and beyond compromise. At our current level of 391 PPM entire species and ecosystems are already collapsing--this is NOT a test. It is imperative that any new legislation further empower the successful Clear Air Act, not gut it as Kerry/Lieberman's bill does. Effectively immediately ALL SUBSIDIES going to Big Oil, Big Gas, and Big Nuclear must be redirected to green, renewable energy sources.

It is unconscionable that BP should have a single iota of control over stopping the hemorrhaging of the spill or the cleanup. It has no clue, is massively criminally complicit, and has worsened the ecocide immeasurably with every botched effort it has attempted. Most critically its massive reliance upon Corexit has irreparably dispersed toxicity throughout the water column. The tragedy of this is while disguising the volume of crude reaching the shorelines it actually serves to decrease the effectiveness of the booms deployed.

Even more alarmingly it assures that strong Gulf stream currents can invisibly carry its lethal effects to the Atlantic coast and beyond. This is happening as we speak and it is intolerable.

BP's assets should be seized, its charter to operate anywhere on land or sea in America terminated through legal debarment. Given the dire threat to our ecosystem BP's executives have knowingly risked for the sake of greed, they should be criminally culpable to the fullest extent of the law. Today.” (EPA-HQ-OAR-2009-0923-0560-1)

Comment:

“Hasn't it become crystal clear that "Big Oil" - and BP in particular - has no credibility and can't be trusted in any way, shape or form? Nothing but lies, deception and every attempt possible to derail any efforts to make a successful transition to safe, clean and efficient alternative forms of

energy.

The Government keeps telling the American people that the parties responsible for the debacle in the Gulf will be held accountable. If so, how and when??? We were also told that the parties responsible for the "Nightmare on Wall Street" and the country's financial meltdown would be held accountable. Well, we're still waiting. Our government also has a credibility problem here. Until the American people see prompt, specific and severe actions taken to hold the responsible parties accountable - as promised - why should we trust and believe the government any more than Big Oil, Big Banks or Wall Street???

What can you do? You can stand up and fight against Big Oil and their very powerful lobby machine. They have been successful time and time again in killing or watering down legislation and/or regulations which are badly needed to insure proper industry oversight, true accountability and strict law and regulation enforcement. PLEASE, Administrator Jackson - No rhetoric, no threats - just swift and forceful action by your agency is what's needed. There are millions and millions of Americans who believe as I do and are counting on President Obama, on you - and many other members of his administration to do the right thing and help us get our country and its government back - and away from the control of Big Business and its powerful special interest influence.

Thank you for time and your careful consideration of my comments and requests.” (EPA-HQ-OAR-2009-0923-0561-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0562-1)

Comment:

“Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-0563-1)

Comment:

“As Alaskan residents, we are the first to see the effects of global warming, the first to see the damage brought by global warming, and we don't want to see our unspoiled wilderness further damaged by pollution.” (EPA-HQ-OAR-2009-0923-0564-1)

Comment:

“If we learned ANYTHING from this disaster presented to us by BP, it is that the culprit will deceive us if they possibly can. We were told 5000 Gallons a day for so long. Today experts are saying it is more like about half a million a day. 1% of the truth was conveyed. The government is no better. Lets have one thing please... Honesty will lead us to a cleaner path more quickly than any policy.” (EPA-HQ-OAR-2009-0923-0565-1)

Comment:

“The oil and gas industry must be held accountable for their environmentally degradable actions.” (EPA-HQ-OAR-2009-0923-0566-1)

Comment:

“The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0567-1)

Comment:

“If there is nothing else to be learned from this, we at least need to learn that it is time for clean energy -- wind, solar, geothermal, etc-- and time to end the petrol era. Time to move forward and not backward.” (EPA-HQ-OAR-2009-0923-0568-1)

Comment:

“Not one more drop of oil should be drawn from the Gulf of Mexico until every well out there has a second well drilled (at owners expense) that will serve as a kill switch for any future blow out like the one that just exploded. This is God's planet, not BP's, not EXXON/Mobil's, not Shell's. Humans caused this disaster, and humans must take responsibility.” (EPA-HQ-OAR-2009-0923-0569-1)

Comment:

“As a resident of Cape Cod where we are already experiencing the effects of climate change on our lifestyles and the natural world around us in the ocean and on land. We need EPA to exhibit leadership on addressing the issue of reducing greenhouse gas emissions and starting to develop regulations to address climate regulation. A number of towns on Cape Cod and the counties of Nantucket/Marthas Vineyard have developed climate action plans and are moving forward on implementation. The same is true for the Commonwealth of Massachusetts which is part of the Northeastern REGGI cap and trade system to reduce greenhouse gas emissions. Unfortunately Congress and federal agencies in Washington, D.C. have been all talk with little action. This has to change !!!” (EPA-HQ-OAR-2009-0923-0570-1)

Comment:

“If there's ever been a "right time" to fix this it is now!” (EPA-HQ-OAR-2009-0923-0571-1)

Comment:

“Please be cognicent of the air, water, and soil polution endured by the inhabitants of the Raton Basin, complements of the CBM gas drillers, Southern Colorado.” (EPA-HQ-OAR-2009-0923-0572-1)

Comment:

“The oil and gas industry must no longer be allowed to keep the public in the dark about their pollution in order to continue their dirty business as usual ways. NO EXEMPTIONS for oil and gas!” (EPA-HQ-OAR-2009-0923-0573-1)

Comment:

“Accoutability is a feedback mechanism telling us whether our systems are working or not; it should be universal.” (EPA-HQ-OAR-2009-0923-0574-1)

Comment:

“The grim BP disaster unfolding in the Gulf shows that the oil and gas industry must be held accountable.

BP must be held accountable.” (EPA-HQ-OAR-2009-0923-0575-1)

Comment:

“This whole situation is deplorable and will have an affect on countless lives, human and other, that cannot even be calculated. This is the worst spill ever and could have been prevented. BP had the fifth highest profits in the WORLD last year! They have the resources and have been trying to get the taxpayer to cover for them all along. ACCOUNTABILITY! The same accountability that is demanded from the poor should be demanded from the rich. They can afford a fleet of ships to contain this spill but instead they chose to ignore it at the people and earth's expense. I am disgusted and will not let up on this issue and will continue to educate others to the outrage.” (EPA-HQ-OAR-2009-0923-0576-1)

Comment:

“So called Free Market concepts that allow businesses to flaunt regulations and not take responsibility for their actions must be curbed. We deserve protection from irresponsible actions by all businesses, whether oil or health insurance or financial services industries.” (EPA-HQ-OAR-2009-0923-0577-1)

Comment:

“Stop the corporate influence of Big Oil. Big Oil has plundered God's Creation, polluted the heavens and the deep sea. This is corrupt business, because Big Oil hasn't paid ALL the costs involved with their product. If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0578-1)

Comment:

“BP MUST pay for the destruction of an American treasure, the rich fish sanctuary of the Gulf coast. It is over for BP and all of Big Oil.” (EPA-HQ-OAR-2009-0923-0578-2)

Comment:

“The clear lesson of BP disaster unfolding in the Gulf is that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0579-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0580-1)

Comment:

“It's clear from the BP disaster in the Gulf of Mexico, that the oil companies are NOT going to voluntarily report the full scope of spills. It would be madness to let the oil industry off the hook for anything less than the full disclosure of environmental pollution.” (EPA-HQ-OAR-2009-0923-0580-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0583-1)

Comment:

“Please, do the right thing. How many more of these disasters will it take before it is too late to do anything. Hopefully, we haven't reached that point yet. Please help us all now.” (EPA-HQ-OAR-2009-0923-0583-2)

Comment:

“they are pumping this stuff into the publics air” (EPA-HQ-OAR-2009-0923-0584-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0584-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0585-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0586-1)

Comment:

“If BP will not own up and take responsibility fro the disaster and get the mess cleaned up, revoke their ability to do business with the United States and freeze their bank accounts until it has been paid fro by BP the U.S. Taxpayer should not have to foot this bill!” (EPA-HQ-OAR-2009-0923-0586-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0587-1)

Comment:

“BP is not the only oil company so take a good look at all of them and instiitute whatever rules and regulations that are needed to protect our environment, no matter what it may cost the companies.” (EPA-HQ-OAR-2009-0923-0587-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0588-1)

Comment:

“Greedy Oil Businesses Are Putting Profits Above The Environment! They Don't Care About The Future Of The Planet!” (EPA-HQ-OAR-2009-0923-0588-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0589-1)

Comment:

“When the results of deregulation become this deadly, it's obvious that big oil, not the government, is out of control. BP must be made to pay for their carelessness and hubris, and the EPA must act to prevent such needless devastation from happening again.” (EPA-HQ-OAR-2009-0923-0589-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0590-1)

Comment:

“This SHOULD be a no-brainer. Are you kidding me? The government is supposed to serve all the people and not just the ones with the most money. It is a shame and a disgrace that this government has allowed itself to be sold to the highest bidder and seems to think that there will be no consequences to its actions. Shape up, people, or we will vote ALL of you out!!!!” (EPA-HQ-OAR-2009-0923-0590-2)

Comment:

“It is clear that from the BP disaster that the oil and gas industry are not responsible world citizens and must be held accountable for the damage they do to the planet in search of profits.” (EPA-HQ-OAR-2009-0923-0591-1)

Comment:

“We must not let the faceless, immoral large corporations continue to have their way with this planet the way they have thus far.” (EPA-HQ-OAR-2009-0923-0591-2)

Comment:

“This is completely unacceptable. I am grateful that at least the Bush Environmental Pollution Agency is gone. Hopefully, we can now begin to hold polluters in the oil and gas industry accountable.

Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.

This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.

We urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0592-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0593-1)

Comment:

“It is easy to point fingers when a disaster occurs, but the truth is that this could have happened to any company on any rig anywhere. The problem is that we need the oil so badly that we permit hazardous operations even when we know what could happen. And now it has. This is OUR fault and this is me taking action. I personally am going to do everything I can to conserve more energy and switch to cleaner earth-friendly energy sources like wind and solar power.” (EPA-HQ-OAR-2009-0923-0594-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0594-2)

Comment:

“As our appointed oversight agency, please take control of this renegade industry and make certain that it stays under control until we can finally shut it down. We only have one earth to live on and this has got to stop.” (EPA-HQ-OAR-2009-0923-0594-3)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0595-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0596-1)

Comment:

“I voted with confidence that Obama's administration was not like Bush's and that we were on our way to renewable clean energy! Please do not buckle under the pressures from the BIG Oil companies! Their views of the environment are not what most American's believe! We want to protect our precious resources for the future generations- perhaps it's time that Americans get to vote on these decisions that seem to get distorted by payoffs and greed! Any company that pollutes should have to pay for the pollution/spills that their company may encounter and should have any and all possible scenerios for clean-up immediately available and the technology for it before it happens!” (EPA-HQ-OAR-2009-0923-0596-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0597-1)

Comment:

“The gas and oil industries are willing to ask us to grant them the privilege to mine and drill. When that privilege is granted, we are not expecting too much for them to make sure of the operations they establish to do this. Back up and emergency plans should be a part of all the efforts. Clearly BP does not have any idea if they can really stop this leak or not. They should not be given any loop holes that will allow them to escape paying for the damage that has been done. The case of the Exxon spill is evidence of how lasting the harm done by a spill will be.

How many other industries and jobs will be hurt by this disaster. Accountability is a MUST!!” (EPA-HQ-OAR-2009-0923-0597-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0598-1)

Comment:

“Please have the government follow our country rule: of the people, by the people and FOR the people. The government holds our future in their hands, do respect how great we are and govern us to continue to do what is best for ALL of us and keep the respect of the rest of the world. Feel more than free to pass this entreaty to our senators and congressman, etc. Let all who lead put the greater good into play and less on their own selfish "wants". Thank you.” (EPA-HQ-OAR-2009-0923-0598-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0599-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0600-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0601-1)

Comment:

“When the Santa Barbara oil spill despoiled an incredibly beautiful Coastline in California, people gave up driving their cars back in the early 1970s. When the Exxon Valdez oil catastrophe occurred up in Alaska, the country was outraged and wanted criminal action to hold these reckless polluters accountable. And now we have the most ecologically damaging disaster in U.S. history caused by a major oil company. They say insanity is when you repeat the same actions and expect different results. We are an addictive society with oil and unless we as a nation begin to go through a twelve step plan to wean ourselves off this non-renewable dirty and

ecologically nasty resource we as a nation are doomed to play out a continuous devastating toll on our future as a nation.” (EPA-HQ-OAR-2009-0923-0601-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0602-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0603-1)

Comment:

“It is time to end the oil and gas companies being in the pockets of all our Congress and Senate. The whole Country is disgusted with Congress and we will attempt to rid ourselves of these corrupt people.” (EPA-HQ-OAR-2009-0923-0603-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0604-1)

Comment:

“Please, I'm finally going to beg. Please make the oil and gas industries own up to the emissions they are polluting this earth with. No longer allow them to hide the truth. Haven't we seen enough. The earth and humanity can take no more. They are going to be responsible for the death of all. Even they will have no where to hide. Make the politicians stand up [for once] for what is right to protect us from the dirty companies and dirty politicians. Don't they realize what they are doing to our grandchildren with these filthy emissions. Greed is all they care about. But they must know they will be living on the same earth and breathing the same air. EPA do your job and require and force these companies to use rigorous pollution measurements and clean up their act. Have we not seen enough with this massive oil leak that is destroying our ocean and shore lines. This oil company knew better but kept pumping for their millions. Money, Money, Money. That's all that counts. EPA you are also responsible. Who is lobbying you and for what purpose. Do your job THE RIGHT WAY. Can you even be trusted. Show the stuff you are made of by holding big oil and gas accountable for their actions or lack of actions. America is fed up.” (EPA-HQ-OAR-2009-0923-0604-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0605-1)

Comment:

“What is happening is criminal and holding people accountable is not enough!” (EPA-HQ-OAR-2009-0923-0605-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0606-1)

Comment:

“The time for strict regulation of these industries to promote safety for the, "general welfare" of the people is long overdue.” (EPA-HQ-OAR-2009-0923-0606-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0607-1)

Comment:

“Can we please just end the era of the oil dynasty? You can friend the leaders of green energy and give them kickbacks and allowances, too. It would probably be wise to embrace this concept now.” (EPA-HQ-OAR-2009-0923-0607-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0608-1)

Comment:

“It's about time to do something about this problem, or do we wait for the next disaster which could result in a greater catastrophe? Please take action now and impose regulations and fines to make the oil industry sit up and listen.” (EPA-HQ-OAR-2009-0923-0608-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0609-1)

Comment:

“Please listen to the people. The oil and gas industry has for too long been a priority over environmental and health and safety concerns. The recent disaster and the current and future changes to our plant should be enough to change the old practices and move to putting our environment, workers, and the community first.” (EPA-HQ-OAR-2009-0923-0609-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0610-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0611-1)

Comment:

“The country is sickened by what's happening in the Gulf. We must begin to hold Big Oil responsible for all the damage they do. Please let life, in all its forms, come before money and power this time.” (EPA-HQ-OAR-2009-0923-0611-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0612-1)

Comment:

“We must save our planet now. We have been thrown at the door of final destruction of our planet, turn our backs now and it will be too late to save. The worst is yet to come and you know I am right.” (EPA-HQ-OAR-2009-0923-0612-2)

Comment:

“Time to hold all up to the greenhouse gas reporting rule! I support the EPA as a citizen of this country in doing just that!” (EPA-HQ-OAR-2009-0923-0613-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0613-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0614-1)

Comment:

“Please ACT LIKE an EPA--make something actually happen for the right- on your watch-it will be a short time- and then the government-will be back in the hands of the other party.” (EPA-HQ-OAR-2009-0923-0614-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0615-1)

Comment:

“Please, I'm finally going to beg. Please make the oil and gas industries own up to the emissions they are polluting this earth with. No longer allow them to hide the truth. Haven't we seen enough. The earth and humanity can take no more. They are going to be responsible for the death of all. Even they will have no where to hide. Make the politicians stand up [for once] for what is right to protect us from the dirty companies and dirty politicians. Don't they realize what they are doing to our grandchildren with these filthy emissions. Greed is all they care about. But they must know they will be living on the same earth and breathing the same air. EPA do your job and require and force these companies to use rigorous pollution measurements and clean up their act. Have we not seen enough with this massive oil leak that is destroying our ocean and shore lines. This oil company knew better but kept pumping for their millions. Money, Money, Money. That's all that counts. EPA you are also responsible. Who is lobbying you and for what purpose. Do your job THE RIGHT WAY. Can you even be trusted. Show the stuff you are made of by holding big oil and gas accountable for their actions or lack of actions. America is fed up.” (EPA-HQ-OAR-2009-0923-0615-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0616-1)

Comment:

“It seems like other problems we have are related to rules and regulations that have not been developed and carried out because the Industries have lobbyists who can get what they want by giving Legislators millions to get what they want.” (EPA-HQ-OAR-2009-0923-0616-2)

Comment:

“I am outraged at the smug self-righteousness of the oil/gas industry (NOT 'energy' industry). I am tired of the unchecked natural gas flares going to waste instead of being captured while land is raped elsewhere for gas drilling; I am tired of the taxpayers subsidizing these companies so they can fake us into thinking gasoline really is this cheap. Close this loophole.” (EPA-HQ-OAR-2009-0923-0617-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0617-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0618-1)

Comment:

“Thank you in advance for considering this important issue.” (EPA-HQ-OAR-2009-0923-0618-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0619-1)

Comment:

“Not only that, but double or triple hulled ships, full recompense to the environment (including all deep sea beds and waters), fishing, tourist industries and to the people who live on the coastal areas.” (EPA-HQ-OAR-2009-0923-0619-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0620-1)

Comment:

“IT IS THE JOB OF THE EPA TO PROTECT THE ENVIRONMENT AND EVERY LIVING BEING...PLEASE, START DOING YOUR JOB!! FOR TOO LONG, THE EPA HAS NOT DONE ITS JOB!!

THANK YOU!!! CHERRY in THE COLORADO MOUNTAINS” (EPA-HQ-OAR-2009-0923-0620-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0621-1)

Comment:

“I further insist that the EPA be given the authority to regulate all hydro-fracturing (hydro-fracking) methods as well. This method of obtaining natural gas has the ability to pollute our water for years to come. Too much secrecy and unwillingness to even identify the 566 chemicals involved in this method is highly dangerous and the potential to effect lives of humans, pets and livestock is horrendous!

The damage due to lax and willful inconsideration to those who are too often victims of wealthy corporations must be addressed. The world is less inhabitable due to their failures and lack of concern to correct problems. It must be made clear that the American people have had enough of the staging and fake concern. They need to be shut down and not have opportunity to kill people and hold up fixing problems by going to court.” (EPA-HQ-OAR-2009-0923-0621-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0622-1)

Comment:

“Stop caving in to cooperate pressure and remember who you work for and who are are charged to protect!” (EPA-HQ-OAR-2009-0923-0623-1)

Comment:

“It is essential that the EPA set things right and finally include the offshore -- and onshore -- oil and gas industry in your system, which, until now, it has not been. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. It's pretty obvious that we should have had that data.” (EPA-HQ-OAR-2009-0923-0624-1)

Comment:

“The fact that they maneuvered their way out of it to begin with is a disgrace.” (EPA-HQ-OAR-2009-0923-0625-1)

Comment:

“Let us leave a clean environment for our grandchildren.” (EPA-HQ-OAR-2009-0923-0626-1)

Comment:

“Afterall, we only have one planet, and due to human pollution, we need to be held accountable to provide necessary regulations.” (EPA-HQ-OAR-2009-0923-0628-1)

Comment:

“All possible information on who and how greenhouse gas emissions are being produced to effectively fight global warming. An industry as big as the oil & gas industry can't be exempt from the rule on greenhouse gas emissions reporting.” (EPA-HQ-OAR-2009-0923-0629-1)

Comment:

“The time has come when we must hold these rotten scum bags liable and either send them to jail for life, take all their assets or take them out and shoot them as the Asians do when they are found guilty of mayhem to the earth and its inhabitants!” (EPA-HQ-OAR-2009-0923-0630-1)

Comment:

“And the fact that it could have been any of the big oil companies to have one of their rigs blow is also a fact that must be stressed....not a single oil company has modern preventative policies and practices in place to stop such a disaster from happening. SHAME SHAME SHAME on these mega-conglomerates that make billions and use none of their profits for scientific studies towards the creation of up-to-date preventative procedures. It is blasphemous and horrific. They MUST BE HELD ACCOUNTABLE! BP GO HOME! BOYCOTT BP/ARCO PRODUCTS!” (EPA-HQ-OAR-2009-0923-0631-1)

Comment:

“We cannot afford to continue to pollute the environment and are already facing extremely dire consequences with BP. Both on and offshore industries need to be regulated and accountable for emissions and other pollution.” (EPA-HQ-OAR-2009-0923-0633-1)

Comment:

“Please do the right thing. Thank you for your time and consideration.” (EPA-HQ-OAR-2009-0923-0635-1)

Comment:

“Enough is enough. The American people are sick of this. We know Climate Change is a very real and serious threat, and we are decades late in addressing this problem to where it may be to late. We want serious action, and we want it YESTERDAY!” (EPA-HQ-OAR-2009-0923-0636-1)

Comment:

“As a nation and as a species who depends on the environment for survival, we cannot afford another ecodisaster like the unfolding one, and the only way to insure our own protection and survival is to set very strict control and reporting systems that are meticulously followed.” (EPA-HQ-OAR-2009-0923-0637-1)

Comment:

“Please assure that science based regulation is a critical tool to help protect the environment.” (EPA-HQ-OAR-2009-0923-0639-1)

Comment:

“Please don't let the gulf disaster repeat itself!” (EPA-HQ-OAR-2009-0923-0640-1)

Comment:

“They made this mess, so they should pay to clean it up.” (EPA-HQ-OAR-2009-0923-0641-1)

Comment:

“BP says they are doing all they can to fix their disaster. If that were true we would see hoardes of clean up workers (paid by BP) on the Gulf coast!” (EPA-HQ-OAR-2009-0923-0642-1)

Comment:

“Please don't "pussy-foot" aroundf & let these big oil corporations find more loopholes to avoid their responsibility. We Americans have AND are paying the PRICE for EXON-Valdez AND NOW BP. EVEN MORE Lives are being destroyed BY THE GULF DISASTER than any other."spill". I ASK YOU to fullfil your responsibility as the regulatory agency for this industry.” (EPA-HQ-OAR-2009-0923-0643-1)

Comment:

“Act aggressively to prevent future environmental disasters by the lax laws that govern the oil and gas industry. I oppose all oil and gas exploration and drilling in Alaska and in the Outer continental shelf.

MAKE THE OIL AND GAS INDUSTRY OBEY THE MOST STRINGENT REPORTING RULES.” (EPA-HQ-OAR-2009-0923-0644-1)

Comment:

“The U.S. needs to reduce energy consumption, especially fossil fuels, and move toward green solutions. Giving serious attention to population growth is also a major part of the energy/environmental equation, since more people require more energy, pollute more, and consume more natural resources. When will our leaders realize the need for population policies? How bad does it have to get before this issue is addressed rationally, humanely, and compassionately?

Do what's right. please!” (EPA-HQ-OAR-2009-0923-0645-1)

Comment:

“It makes me quite literally SICK when I see the increasing pollution caused by BP's complacent and totally unacceptable safety and security practices have done to our poor suffering planet. God pray somehow we will find a way to stem this oil leak disaster, and help the poor fisherman, tourist and all other industries that are close to and directly affected by this incredibly massive oil leak, and now face probable ruin, BP have, in one easily preventable failure, caused untold devastation to our wildlife and sea habitat, and serious long term effects to our seas and oceans, which will probably never recover This is a global disaster, and BP should be made to pay for the consequences of its' arrogant attitude and practices, we, the public, the people affected, need to see that BP and the entire industry has fixed their attitude and practices so that we NEVER see the like of this disaster again.” (EPA-HQ-OAR-2009-0923-0646-1)

Comment:

“The delay on this has gone on far too long..... PLEASE don't make us MARCH!!! for our own healthy environment again!!!!” (EPA-HQ-OAR-2009-0923-0647-1)

Comment:

“Following the BP disaster unfolding in the Gulf, I urge you to hold the oil and gas industry accountable by requiring them to report their emissions.” (EPA-HQ-OAR-2009-0923-0648-1)

Comment:

“Do private citizens really stand a chance any more against high-paid lobbyists? Is democracy dead?

The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0649-1)

Comment:

“We cannot allow big oil companies to buy their way out of following regulations that need to be implemented. The offshore oil companies MUST comply with EPA standards, or they should not be allowed to be drilling offshore. Our ocean and shoreline ecosystem are fragile, important, and must be preserved. Please, please, please make offshore oil companies comply with EPA standards and regulations.

And, by-the-way, why is the EPA allowing BP to use dispersants that may not be good for the environment? You told them to change or to decrease their usage of what they were using, yet BP totally and flagrantly disregards your orders? Take action! Don't let BP tell the EPA what to

do. It is supposed to be the other way around. Now, get tough with both BP and offshore drilling companies.” (EPA-HQ-OAR-2009-0923-0650-1)

Comment:

“The Oil Industry as all other industries need to be held accountable for their pollution. Please make it mandatory that they have to report and track emissions, The Gulf Diaster is the worst enviornmental diaster the world has experienced and must be stopped. It is unconscienceable that they took short cut and ignored the advice of the contractors for speed of time and money. The old saying "Haste makes Waste" certainly applies in this situation. The most insulting part of the whole story is that they had no plan in place for a serious diaster.

Please do your job and plug the loophole now.” (EPA-HQ-OAR-2009-0923-0651-1)

Comment:

“To start off with, these guys really should be in hand cuffs and marched off to jail- BP, Transocean, and Haliburton for the Deepwater Horizon disaster.” (EPA-HQ-OAR-2009-0923-0652-1)

Comment:

“You have the jurisdiction of the Clean Air Act. Use it to do indictments against these criminals and thugs?” (EPA-HQ-OAR-2009-0923-0652-2)

Comment:

“It seems incredible to me that BP does not hire tens of thousands of people filling and deploying sandbags to protect the wildlife refuge and the fisheries and the coastline.” (EPA-HQ-OAR-2009-0923-0653-1)

Comment:

“I strongly concur with adding offshore and onshore oil and gas industry in the EPA reporting system.” (EPA-HQ-OAR-2009-0923-0654-1)

Comment:

“For my part if I, personally, had caused all this damage and grief I wouldn't be making large amounts of profit, my profit would be going the other way and I would be in jail as a terrorist of something similar.” (EPA-HQ-OAR-2009-0923-0656-1)

Comment:

“The gulf disaster is the proof of the folly of letting the oil and gas industry be exempt from monitoring and/or monitor themselves and/or having their representatives do the monitoring in government. It is time to have fully independent monitors, perhaps adversarial. And, since the industry realizes all the profits of their ventures, the industry should also have full liability for their failures.” (EPA-HQ-OAR-2009-0923-0657-1)

Comment:

“Lets develop a National Energy Policy that emphasizes renewal sources, nuclear energy, and natural gas as our remaining fossil fuel. Thank you.” (EPA-HQ-OAR-2009-0923-0658-1)

Comment:

“Please do all that you are allowed to do, as fast as possible before they shut you down. I feel you people ARE AWARE OF THE NEED, MUCH MORE THAN WE THE PEOPLE ARE.” (EPA-HQ-OAR-2009-0923-0659-1)

Comment:

“The Obama administration has a lousy environmental record. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-0660-1)

Comment:

“The rest of the world knows just how damaging the oil industry is...just ask someone directly involved in Ecuador, Nigeria, etc. It's about time Americans were told the truth so they can seriously begin to modify the so-called American way of life...Do your duty!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-0661-1)

Comment:

“How much more deceit by big oil are we going to endure for them to continue the outrageous profits at the expense of the life and wellbeing of the American people? How much more damage to our water and air can we endure while we continue to depend on an energy source that is sucking the life out of the Earth? How much more pleading by those of us you represent will be enough for you to insist on honest reporting that is not polluted by the lobbyists of this greedy industry? No more.” (EPA-HQ-OAR-2009-0923-0662-1)

Comment:

“Please consider that oil is a finite resource that took Nature hundreds of millions of years to create. In the last 150 years humanity has used nearly 1/2 of the planet's reserve of this vital resource. We must cease our dependency on it as soon as possible and save what remains for future generations. Likewise we need to save our nation's oil for future generations; "Drill Baby Drill" is the cry of senseless greed that forgets our children. Bruce Hector M.D.” (EPA-HQ-OAR-2009-0923-0663-1)

Comment:

“Your strong support is valued& appreciated.” (EPA-HQ-OAR-2009-0923-0664-1)

Comment:

“All information should be made public, including your efforts to enforce new and existing laws and mandates. Also, the current government shouldn't be blamed for this disaster, and BP needs to be held fully accountable, both financially and morally. Oh, and be sure to get some of those "Drill Baby Drill" idiots down there to help clean the birds and shorelines.” (EPA-HQ-OAR-2009-0923-0665-1)

Comment:

“The Oil & Gas Companies, should be held accountable! I live in New Orleans, through Katrina and now this! At least Katrina was a natural disaster which could not be helped, but this is different.” (EPA-HQ-OAR-2009-0923-0666-1)

Comment:

“In my state of Pennsylvania inadequate regulation and oversight of natural gas drillers is already polluting our land and water. The "gold rush" to Marcellus Shale gas in PA will soon reach epic proportions without strong federal oversight.

Hundreds of thousands of our state's finest forests have been leased to large conglomerates of gas drillers. Many of the smaller companies are already being absorbed by huge energy interests from other countries. PA legislators with seniority on the most crucial committees have already been "bought" by big energy providers. Despite the fact that our state is in desperate financial trouble, we can't get the legislature to levy gas extraction taxes in line with those of our surrounding state neighbors.

The same sort of inadequate regulatory and oversight functions that were obviously absent leading up to the Gulf oil spill are evident in PA now. It is imperative that the EPA demand modification of the Clean Air Act to include the proper statutory basis for regulation and oversight of natural gas producers in the Marcellus Shale.

I was so impressed by your presentation at the recent Women's Health and the Environment conference in Pittsburgh. You made me feel proud. It was wonderful to have you here with Theresa Heinz. Please help us now.” (EPA-HQ-OAR-2009-0923-0667-1)

Comment:

“The oil and gas corporations must take responsibility for their tragic, conscious assaults on America's precious natural resources. The gulf oil spill was not an accident. BP was cutting safety measures to increase profits.

After 20 years, we have not received full payment for the clean-up from the Exxon-Valdez spill. The marine ecosystem of the area still suffers!

BP has resisted the United States government calls for full payment for the damage. Just the loss of commerce and jobs resulting from the spill should cost BP billions \$\$\$\$\$. The government must DEMAND that it is paid.

Why has the EPA not stopped BP from spreading dispersants? The chemicals are very toxic and are killing our fish and wildlife. The dispersants are ineffective. They are a ruse. BP uses them to try to show the American public that BP cares and is trying to right their wrong doings.

The top management of BP (especially the CEO) must be charged by the Justice Department and face those charges in an American court of law.

Any American citizen that knowingly did what BP has done would be charged with a felony.

Just because BP is one of the largest corporations in the world, is no reason for the US government to look the other way when they violate the law.

Hundreds of millions American citizens expect more from their government.

Instead of changing US law to reduce the regulatory oversight of big oil, the EPA MUST strengthen the monitoring and write more stringent rules. Each violation of safety rules MUST cost these corporations dearly. The US government must shut down all operations on American soil and in American waters when a violation of safety regulations is found and it is proven that the corporation was aware of the violation.” (EPA-HQ-OAR-2009-0923-0668-1)

Comment:

“In light of the recent issues, let's do the best thing for our planet and for our grandchildren. Report accurately and truthfully what are the impacts of all aspects of the oil industry including emissions. Thank you.” (EPA-HQ-OAR-2009-0923-0669-1)

Comment:

“We subsidize the oil exploration with cheap leases and inadequate regulation, we subsidize the oil companies with tax breaks etc., and we're just paying for our own demise.

Strike while the iron is hot, while people are outraged and the process is still going on. Include all the oil and gas industry activities in global warming tracking. And if EPA means anything, shouldn't the EPA have some say about what sort of preparations are needed for drilling operations in case of "accident"?

Hold them accountable!” (EPA-HQ-OAR-2009-0923-0670-1)

Comment:

“The oil and gas industry must be held accountable for its failures. But too often it has lobbied its way out of accountability. Last year, the industry got around the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-0671-1)

Comment:

“I strongly support The Obama Administration go deeper to the real problem. Post Peak unrenewables of all Oil, Natural gas, coal and uranium show the same scenario. Each is descending the supply and each is ascending the demand. Hoarding is going on in nations that will not publicly show this disparity as real. To avoid a sudden panic, the administration is burying its head to the disparity by making believe it can foster the same growth pattern in exponential functions as in the past.

The truth is the extraction / demand disparity is unrevokable. Extractions of unrenewables including water from water tables everywhere have been so breached, there is no way out but to change habits. We need a message NOW from the White House to ease into the changing of habits of first world countries profiting from every last drop of unrenewable energy. This strategy plays forward a looming crisis and tragedy. Where will the money and costly technology to power up the many renewable energies be found, after every drop of renewable energy is so costly that it can no longer be supported by each of those extraction industries?

This failing scenario must be at least internally understood in the White House. Powering up all the new renewable energy technologies it can NOW with the banked ability left NOW is essential to avoid collapse. Exponential functions pose their law on us. Even one percent of any future growth means a hockey stick loss of ability to power up new renewable energy. Time is running out to make the transition in any kindly way.

I urge you to ensure that the system is revamped NOW to find new balance for Earth to provide what it can without extractions. Once these are in place, with assuredness that all first world places assume this responsibility in developing new habits of conservation and no extractions, the detailing of the next generation of a new kind of wealth for all people will become possible. All pollution measurements that the present industry's emissions present to us during this shift must meanwhile be reported to show compliance with new renewable systems. We must NOW tide us over the new energy hump to a sustainable restorative future.” (EPA-HQ-OAR-2009-0923-0672-1)

Comment:

“The EPA needs to be the regulatory agency it was setup to be and follow the laws that were enacted to protect our environment. Don't back down, stand strong against the immense industry lobby and corporate greed.” (EPA-HQ-OAR-2009-0923-0673-1)

Comment:

“The public has the right to know what levels of pollution they cause.” (EPA-HQ-OAR-2009-0923-0674-1)

Comment:

“The public has the right to know what levels of pollution they cause.” (EPA-HQ-OAR-2009-0923-0675-1)

Comment:

“Have we have learned anything watching the grim BP disaster unfolding in the Gulf ? What we have learned it's that the oil and gas industry must be held accountable. We have also learned that the MMS section of the Department of the Interior also requires oversight. Government and corporate fraud and mismanagement often go together. Where EPA can right mismanagement or fraud in the Department of the Interior we need remedies, and very likely, whistleblowers. More easily said than done ? I've done just that against the USDA in the past.” (EPA-HQ-OAR-2009-0923-0677-1)

Comment:

“Corporate charters require public accountability. When corporations are at risk of maintaining any public accountability, then they need to post bonds in order to continue to hold their charters.” (EPA-HQ-OAR-2009-0923-0677-2)

Comment:

“WE MUST START TO BE A COUNTRY OF LAWS AND NOT EXCUSE THE OIL GLUTTONS TO RUN THIS COUNTRY.” (EPA-HQ-OAR-2009-0923-0680-1)

Comment:

“We need the truth--complete, verifiable facts--so we can make informed decisions.” (EPA-HQ-OAR-2009-0923-0681-1)

Comment:

“Instead, it is time to invest in green biofuels such as Algae based fuels.” (EPA-HQ-OAR-2009-0923-0682-1)

Comment:

“Again, SELF REGULATION dosen't work” (EPA-HQ-OAR-2009-0923-0683-1)

Comment:

“The oil industry told us if there was a accident they had a plan to stop the spill and clean up what they did spill, they lied. We can never trust this industry or the people that run it ever again. They have killed our wildlife, destroyed our shores and taken away peoples livelihood. How much more can this country endure, it's time to tell these people, No!” (EPA-HQ-OAR-2009-0923-0684-1)

Comment:

“The oil industry has shown itself to be criminals and enemies of the United States. Until we can stop them completely, we must do everything possible to watch them, harness them, and punish every little misdeed.” (EPA-HQ-OAR-2009-0923-0685-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.

They make huge profits, then leave us with the costs and environmental damage. This MUST be stopped.” (EPA-HQ-OAR-2009-0923-0686-1)

Comment:

“For years we have used the taxpayers' dollars to subsidize these companies. It is time to hold them to account!” (EPA-HQ-OAR-2009-0923-0687-1)

Comment:

“Clearly you have a difficult assignment, when Corporate financial influence over our politicians is so pervasive. Hopefully in the near future, with much public effort, we can rid our elective process of Corporate bias.” (EPA-HQ-OAR-2009-0923-0688-1)

Comment:

“I find it difficult to understand why the gulf oil spill happened. My understanding is that for approx. 1/2 million \$\$ a fail safe system could have been installed, but big oil negotiated with the government and weaseled out of this system. They made BILLIONS in profit, and now we're all going to pay the price. Please make them accountable and negotiations more transparent.” (EPA-HQ-OAR-2009-0923-0689-1)

Comment:

“The oil and gas and coal energy sources have their price to pay. I'm no longer willing to overlook the subtle (sometimes obvious) costs to our environment. Yes, require the reporting; yes, verify. Have consequences for exceeding the reasonable standards to restrain global warming and to safeguard public health in the national interests.” (EPA-HQ-OAR-2009-0923-0690-1)

Comment:

“The world's economy is so dependent on oil that clearly that cannot change quickly. But it is time that responsible governments encourage more research and development funding towards reasonable alternatives.” (EPA-HQ-OAR-2009-0923-0691-1)

Comment:

“Also, so much money is spent trying to find new oil with methods riskier and riskier to the environment, a larger percentage of that money needs to be spent on preventing accidents.” (EPA-HQ-OAR-2009-0923-0691-2)

Comment:

“It is very important to me that oil companies, and their exploration business partners, all be held to high accountability. They must be required to report all emissions and pollution events and amounts.

Please require their inclusion in environment controls and reporting.” (EPA-HQ-OAR-2009-0923-0692-1)

Comment:

“BP, EXXON MOBIL etc -- they're all the same and if they can maximize profit at the expense of the environment and the public, they will, so we (the public and the environment) need strong regulations AND STRONG ENFORCEMENT.” (EPA-HQ-OAR-2009-0923-0693-1)

Comment:

“To hold BP accountable for the current disaster and to compel the oil and gas industry to report greenhouse gas emissions should be a given but it is only the beginning. The current disaster which may well destroy the ecology of the Gulf of Mexico for many decades and may spread to other coasts throughout the world when the oil plumes reach a depth where they will be caught up in ocean currents, should be sufficient reason to prohibit any new offshore drilling along the coastline of the United States and begin the capping of and dismantling of existing wells. That would, of course, cause great inconvenience to many but it would also be a motivation to perfect alternative, renewable energy sources and teach Americans that they can do without SUVs and other big cars and settle for more energy efficient vehicles as they do in some other countries.” (EPA-HQ-OAR-2009-0923-0694-1)

Comment:

“The Obama administration made a serious and unnecessary mistake in endorsing and expanding offshore drilling. The timing could not have been worse. Now it is time to take a consistent hard line with polluters.” (EPA-HQ-OAR-2009-0923-0696-1)

Comment:

“Please take immediate action to revolutionize our auto industry, air travel, and energy industries. We are now a generation paying for our parents mistakes, let's not set up our children

with the same burden. Take action to set, not only higher standards, but the highest the world has every seen. Be a leader.” (EPA-HQ-OAR-2009-0923-0699-1)

Comment:

“IN THIS MOMENT - AS WE WATCH HELPLESSLY IN DESPAIR & DISBELIEF - THE HORRIFIC UNFOLDING OF AN UNCONTROLLABLE DISASTER - THE EPA MUST, MUST ACT RESPONSIBLY. THE EPA CANNOT LET OIL COMPANIES SET THE RULES! THE OIL COMPANIES ACT ONLY IN THEIR OWN INTERESTS. THOSE INTERESTS ARE IN DIRECT CONFLICT WITH SUSTAINABLE LIFE ON THIS PLANET. YOU, AS THE ENVIRONMENTAL

PROTECTION AGENCY, NEED TO DO EXACTLY THAT - PROTECT THROUGH COMPLETE, TOTAL, TRANSPARENT, VERIFIABLE ACCOUNTABILITY.” (EPA-HQ-OAR-2009-0923-0701-1)

Comment:

“Please do what we individual taxpayers pay you to do: protect the environment. Otherwise, you're just wasting our money.” (EPA-HQ-OAR-2009-0923-0702-1)

Comment:

“The oil and gas industry, like the financial industry, has clearly demonstrated that it can't be trusted to do the right thing and police its own activities.Rein them in now!” (EPA-HQ-OAR-2009-0923-0703-1)

Comment:

“We must be sure that the oil and gas industries are held accountable for reporting pollution emissions. I strongly support the EPA's decision to include both offshore and onshore pollution emissions in mandatory greenhouse gas reporting and to ensure that the system uses rigorous, detailed, direct pollution measurements.” (EPA-HQ-OAR-2009-0923-0704-1)

Comment:

“We must all do everything possible to PROTECT OUR ENVIRONMENT !!!!!” (EPA-HQ-OAR-2009-0923-0705-1)

Comment:

“The free ride for oil must be ended. Thank you for doing the right thing after too many years of neglect.” (EPA-HQ-OAR-2009-0923-0706-1)

Comment:

“We ask you to hold the oil and gas industry accountable not only for cleanup of disastrous environmental spills like the Gulf blowout but also for less immediately apparent ones such as greenhouse gas buildups in the atmosphere. As proposed, the EPA should include offshore and onshore activities in the reporting rule, and also require rigorous, detailed, direct pollution measurements as soon as possible. There can be little doubt that the industrialization of the past 100 years is contributing to climate change, and if the human race does not address this problem we are all going to pay a much higher price than the oil and gas industry will for controlling its carbon emissions. The U.S. must take the lead in this effort.” (EPA-HQ-OAR-2009-0923-0708-1)

Comment:

“The oil and gas industry must be held accountable for the impacts of their drilling and for the impact of oil and gas emissions. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-0709-1)

Comment:

“It is time for the oil industry to act responsibly and fairly to the American people, just as other businesses do. They should be held accountable both legally and financially for their mistakes, just as individuals or other businesses do. And if certain business practices are just too dangerous and too threatening to the health and wellbeing of people and the environment then those practices must be curtailed.” (EPA-HQ-OAR-2009-0923-0711-1)

Comment:

“Do not allow big oil to wiggle out of responsibility for their pollution.” (EPA-HQ-OAR-2009-0923-0712-1)

Comment:

“Please don't let the lobbyists get their way. Protect the American people and say no to the Oil and Gas industries!” (EPA-HQ-OAR-2009-0923-0714-1)

Comment:

“As a matter of policy all providers of any kind should not only enjoy the benefits of their activities but also be held responsible for the undesirable consequences, intended or not, as well. Certainly that is what we expect of each other as individuals and citizens and we should expect no less from all providers.” (EPA-HQ-OAR-2009-0923-0715-1)

Comment:

“My home here in North Texas is the heart of Texas oil industry. The Texas Oil organization of all oil people has their offices right here in Wichita Falls. A lot of those people are my friends. I have had plenty of disagreements with them especially when I was Mayor of Wichita Falls in the 1980s, so I know them well and the ends they will go to to make big bucks. They will do anything, especially the big boys that have about taken over the small oil operators here in Texas. They have to be held accountable!” (EPA-HQ-OAR-2009-0923-0716-1)

Comment:

“We can't blame BIG OIL for what they are doing. It's the people in our gov. They are incompetent idiots filling a position they know nothing about. What they do care about is their uncontrollable greed and who's butt they can kiss. I'm sure there are rigorous, detailed, direct pollution measurements and all kind of yeas and nays, but there are no balls to check them out and to enforce them . The people get screwed over and over while incompts in gov. are screwing up again and again. I feel so helpless for the planet, nature, the animals and generations to come. Please do what's right” (EPA-HQ-OAR-2009-0923-0718-1)

Comment:

“It seems strange to me that with all the fall out from the BP disaster we are even contemplating anything less than full reporting, accountability, stopping subsidies, stopping all off shore drilling, massive fines for all violations by all oil companies and a much stiffer regulatory role for the government (that is arms leagnth from energy companies.” (EPA-HQ-OAR-2009-0923-0720-1)

Comment:

“Even as we watch the daily murder of the Gulf of Mexico and the human and wild life that are intricately tied to that body of water, more exploration is taking place in dangerous costal waters, without ANY oversight or ANY regulation.

This has to stop TODAY. I hear all the talking heads and PR stooges blather about how it's all so safe, and know that as I watch the "live feed" from the undersea gusher, there is no scale attached to the image, so no true way to measure the escaping oil. The citizens of the United States are being lied to every minute. And no one, not one single person connected with the three companies involved in this brutal attack on my country, is being held responsible." (EPA-HQ-OAR-2009-0923-0721-1)

Comment:

"Wind & solar energy may not be perfect, but they offer no threat of an environmental disaster like the one we are experiencing now." (EPA-HQ-OAR-2009-0923-0724-1)

Comment:

"If President Obama's administration wants to look like a different type of administration than that of Mr. Bush I think all effort must be made to distance this administration for any appearance of being "in bed" with the oil/gas industry." (EPA-HQ-OAR-2009-0923-0726-1)

Comment:

"Please hold the oil industry accountable for its incompetence and lying about how they are polluting our world (planet). The oil industry should be strictly regulated and watched. What has happened in the Gulf shows how irresponsible the oil companies are. Offshore drilling should not be allowed. There are safer and greener ways to acquire energy and bring our country into the 21st century," (EPA-HQ-OAR-2009-0923-0727-1)

Comment:

"Although it's name is not usually associated with the pipeline that runs through the fragile Arctic environments, BP is its chief owner. The pipeline over its life has become infamous for lack of proper maintenance, and recently experienced a 100,000 barrel leak that has not received publicity. But why should BP care? They are not endangering their own country anyway. Too boot, BP has managed to keep this kind of information under wraps by threats and intimidation of those, often their own employees, as well as local officials, who try to get this information to the public....until now. How many other Big Oil companies, with their enormous spending power from billions in annual profit, similarly disregard maintenance and safety procedures whose cost is miniscule by comparison. These companies have free reign to exploit a depleting natural resource (and also get to write the depletion off)with very little benefit and a great deal of peril to the public good." (EPA-HQ-OAR-2009-0923-0728-1)

Comment:

“TOO MUCH POLLUTION - EVEN IF IT CONCEALED WILL EVENTUALLY BECOME REVEALED - THE OCEANS WILL BE DEAD AND TOXIC - THEN WE WILL ALL KNOW - AND IT WILL BE TOO LATE - DO NOT ALLOW THE TRUTH TO BE CONCEALED. ACTION BASED ON THE TRUTH OF WHAT IS REALLY HAPPENING IS NECESSARY TO PREVENT OUR PLANET FROM BECOMING IRREVOCABLY ALTERED AND SIGNIFICANTLY DAMAGED BEYOND REPAIR” (EPA-HQ-OAR-2009-0923-0729-1)

Comment:

“It is way past time to stop subsidizing the oil and gas industry's destruction of our planet's only biosphere, and time we started to call them to account for the harm they cause to everybody.” (EPA-HQ-OAR-2009-0923-0731-1)

Comment:

“And how does Mineral Management department fit into all of this, with its granting exceptions to leasing requirements and doubtful history? Put it right.” (EPA-HQ-OAR-2009-0923-0732-1)

Comment:

“BP alone has spent literally billions lobbying American oil thieves for the past three years. They attended the secret Energy Task Force Hearings planning the invasion of Iraq and privatization of its oil. Let's tell the truth because it is going to be told right now and finally we have going to lead rather than allowing our Congress to feed the corporate war machine. This is just a symptom of the monster and it is about to eat everybody at the EPA who formerly worked there. Have you inspected every rig in the Gulf and forced every owner to install remote shutoff valves? People are going to get mad quickly and when the storms hit and drench them all with oil and they have to move they are going to be very mad. I don't see how you can possibly stop this or clean it. It is patently obvious the GREAT AMERICAN EMPIRE is much too stupid to plug our greed. It is absolutly UN-B-LIEVABLE!!!!!!!!!!!!!!!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-0733-1)

Comment:

“I am writing to you in the aftermath of the BP disaster. What this illustrates to me is that more oversight - not less - is required to insure that both public safety and public good are not sacrificed on the altar of the "whats good for the oil and gas industries is good for us"” (EPA-HQ-OAR-2009-0923-0734-1)

Comment:

“I hope the disaster that is unfolding will cause you to suspend all deep water drilling until adequate safeguards are put in place. Oil and gas are limited resources so the emphasis must be on renewable energy and this is where our efforts and resources should be directed ,not in grovelling to "big oil" and their profits” (EPA-HQ-OAR-2009-0923-0737-1)

Comment:

“And, yes, scientists are still trying to find out the REAL extent of the ecological damage that the spill is doing. The possibility that the greater part of the oil is staying down and not surfacing is frightening and it may keep causing damage for decades (if not centuries) to come. How is the Government going to assess the damage if we don't know for how many years it will continue?” (EPA-HQ-OAR-2009-0923-0738-1)

Comment:

“I am writing to you to express my outrage over our government agencies being in bed with the companies they are to be watching and regulating in order to protect us. People are furious about this disaster and how and why it happened and rightly so. Our government is corrupt and broken, catering to the big companies that rip us off. No more lobbyists should be allowed even near our leaders as it is nothing short of bribery. It has to stop or our country will be destroyed. We are depending on you to clean up the EPA and get back to why you were created.” (EPA-HQ-OAR-2009-0923-0742-1)

Comment:

“The tragedy in the Gulf of Mexico proves that nothing concerning our environmental safety and standards can be left to the wiles of the federal government and its agencies.

The government and corporate America are having a grand love affair at the cost of our health, jobs, and irreplaceable land, air, and water.

The greed has to stop.” (EPA-HQ-OAR-2009-0923-0744-1)

Comment:

“ALL DRILLING SHOULD BE STOPPED UNTIL THIS SPILL IS ENDED AND CLEANED UP.” (EPA-HQ-OAR-2009-0923-0747-1)

Comment:

“Stop the drilling and start funding solar, hydrogen, fuel cell, wind and other alternative energy sources. Each house should be energy independent and generate its own electricity. Then we won't need a power grid.” (EPA-HQ-OAR-2009-0923-0748-1)

Comment:

“Hold Big Oil and Big Gas accountable!” (EPA-HQ-OAR-2009-0923-0749-1)

Comment:

“With all due respect, IS ANYONE DOING THEIR JOB at the EPA??? Are you NOT supposed to be PROTECTING us from just such tragedies??? SHAME ON YOU ALL! You are just as responsible for destroying our planet because you ENABLE the evil oil companies as they despoil our planet. You let the military-industrial-energy complex do whatever they want because they have the MONEY. Shame on you! WE THE PEOPLE deserve better.” (EPA-HQ-OAR-2009-0923-0751-1)

Comment:

“Do whatever is necessary to make big oil act responsibly.” (EPA-HQ-OAR-2009-0923-0752-1)

Comment:

“Further, it is outrageous what the oil and gas industry has gotten away with. This industry has been responsible for ongoing want on destruction of our environment .

Hold this industry accountable and prevent them from repeating their crimes against the environment.” (EPA-HQ-OAR-2009-0923-0753-1)

Comment:

“The disaster continues and continues and VERY LITTLE progress is made to protect the environment PLEASE pay attention to the huge need to protect the environment.” (EPA-HQ-OAR-2009-0923-0755-1)

Comment:

“It is time to hold the oil and gas industry 100% accountable. If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry MUST be held accountable.” (EPA-HQ-OAR-2009-0923-0757-1)

Comment:

“The BP disaster in the Gulf is tragic. And while many of us hope for resolution very soon, this situation demonstrates the need to hold the oil and gas industry accountable.

Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore - and onshore - oil and gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-0759-1)

Comment:

“Our democracy has checks and balances in order to uphold the "public good" in policy and legislative decisions. The EPA serves an important function by ensuring that we are protected from the most egregious actions taken by corporate powers who do not have the public good as a foundation for their decisions.

If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0760-1)

Comment:

“I strongly support the EPA in their effort to require the oil and gas industry to report all pollution emissions in a direct, detailed, immediate form.” (EPA-HQ-OAR-2009-0923-0762-1)

Comment:

“The oil industry, with support from the Bush administration (Mr. Cheney) has long pulled the wool over our eyes. Well, I for one am well aware of what they have gotten away with and many, many other citizens have also. Their profits are astronomical and their destruction massive.

Please make sure that the proposals you make in regard to pollution and emissions are as tough on them and other pollution generators as you can make them - and hold them accountable!” (EPA-HQ-OAR-2009-0923-0763-1)

Comment:

“NO USE OF POISONOUS DISPERSANTS! ALL THAT DOES IS POISON THE ENTIRE GULF OF MEXICO, WHILE "HIDING" FROM SURFACE VIEW, THE HUGE EXTENT OF THE SUB-SURFACE OIL "PLUMES"!!! PLEASE EXPLAIN THIS TO THE PRESIDENT,

NOW!

GET SUPERTANKERS IN, TO SUCK UP THE OIL, NOW!!!

USE STRAW BALES IN THE MARSHES, TO SOAK UP OIL.

LISTEN TO THE PEOPLE WHO WANT TO BUILD SAND BERMS/BARRIORS.” (EPA-HQ-OAR-2009-0923-0764-1)

Comment:

“You have the support of the American people. Now is the time to act.” (EPA-HQ-OAR-2009-0923-0765-1)

Comment:

“In light of what is going on in the Gulf and what has happened in Alaskan waters how can you not support the most rigorous, detailed, measurements on the oil industry. Enough is enough.” (EPA-HQ-OAR-2009-0923-0767-1)

Comment:

“Oil and gas industries must stop receiving special treatment from government agencies!!! We-- and the EPA--need to know where pollution comes from in order to fight it. Be responsible and fight where fighting is due.” (EPA-HQ-OAR-2009-0923-0768-1)

Comment:

“This is a no-brainer! Weve got to get control of this situation!!!!

If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0769-1)

Comment:

“This is not only wasting millions of dollars that could be utilized in alternative fuel development and jobs, but shifting our ecological balance, and ruining land that took centuries to create.

Don't let this continue!!!” (EPA-HQ-OAR-2009-0923-0770-1)

Comment:

“We need to show our children and grandchildren that we take the threat of greenhouse gas emissions seriously and that we are seeking ways to combat the threat to our planets ecosystems. The oil and gas industry needs to be accountable. Please pass the accountability rule!” (EPA-HQ-OAR-2009-0923-0775-1)

Comment:

“I don't know what more will have to happen to convince EVERYONE who has been pushing offshore drilling to know it's way past time for big oil to be held accountable.

It is beyond appalling that this industry was able to lobby its way out of the mandatory greenhouse gas reporting rule - as someone who actually BELIEVES global warming is REAL, forcing oil and gas companies to report would have allowed tracking of all their massive pollution emissions.” (EPA-HQ-OAR-2009-0923-0776-1)

Comment:

“It is amazing to me that this industry's pollution output was not counted!

If the British Petroleum, Gulf Coast disaster is not a wake-up call that the oil companies need to be regulated and watched at every level. Why are we subsidizing their business when we should be spending every available dollar to clean energy?” (EPA-HQ-OAR-2009-0923-0777-1)

Comment:

“It is time that oil and gas industry adhere to total transparency when reporting on how their greenhouse gas emissions affect global warming pollution. They should not be exempted from this extremely important matter.

This loophole needs to be reversed ASAP or we will continue to see more diasters like the one that is happening in the Gulf of Mexico.” (EPA-HQ-OAR-2009-0923-0780-1)

Comment:

“It is a shame that we do not learn unless there is a major catastrophe. As is with anything in life, IF WE DON'T LEARN OUR LESSON, WE GET THE LESSON REPEATED. Let's hope this is the last time we will have this problem and at the very least, put strong regulations in place, as we spend, spend, spend, to find ways to get our energy needs from the sun, ocean and wind - all of them just waiting for us” (EPA-HQ-OAR-2009-0923-0781-1)

Comment:

“The oil and gas industry must not be allowed to continue to determine their own monitoring. They must be held to strict standards that reduce greenhouse gases and now is the time to close this loophole.” (EPA-HQ-OAR-2009-0923-0782-1)

Comment:

“My simple message to you is: Stop letting the oil industry write the rules which supposedly govern them.” (EPA-HQ-OAR-2009-0923-0784-1)

Comment:

“No industry should be able to lobby its way out of mandatory greenhouse gas reporting rules.” (EPA-HQ-OAR-2009-0923-0785-1)

Comment:

“This spill is horrible! I favor strong regulation of all polluting industries so that these disasters will be avoided. If regulation helps wean us off petroleum, all the better.” (EPA-HQ-OAR-2009-0923-0788-1)

Comment:

“Please hold these companies to the same standard to which we would be held accountable. The oil and gas industry hopefully will have to "come clean." I commend you and the EPA for including the gas and oil industry in the mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-0789-1)

Comment:

“BP should be held fully and completely responsible for the harm done via this horrible tragedy. Not only should they compensate the families of the 11 people who died on the rig, whose collapse caused the present day problem, but they should also be held financially responsible for all the damage done to lives (human or not) and other environmental, commercial and private damages. If it means their CEOs literally go bankrupt, so be it!” (EPA-HQ-OAR-2009-0923-0791-1)

Comment:

“The only way scientists can evaluate the impact of the BP oil spill on climate is with accurate tracking and quantification of the fluids pouring out of the sea floor there. But last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-0793-1)

Comment:

“Please hold this industry to accountable standards. Let everyone see the true cost to the world of continuing along this path.” (EPA-HQ-OAR-2009-0923-0794-1)

Comment:

“Whose side are you on? You are supposed to be on the side of the environment! Please support environmental requirements and get this situation fixed. This is an absolute disaster that could have been prevented if BP had not wanted to "cut corners" and the Government overseeing agency was not really interested in our protection but cozy with the oil company. Greed and laxness seem to be constantly at play in our country. How discouraging! Get this situation fixed and see to it that this kind of thing never happens again. If there ever were a strong argument for clean alternate energy, this has certainly proved it!” (EPA-HQ-OAR-2009-0923-0796-1)

Comment:

“The oil industry, and BP in particular have lobbied themselves free of many forms of regulation which we are all paying the price now. Don't let them get away from counting all their emissions.” (EPA-HQ-OAR-2009-0923-0798-1)

Comment:

““No more Offshore!”” (EPA-HQ-OAR-2009-0923-0799-1)

Comment:

“As an American and taxpayer I am, along with millions of others like me, saying there is no other alternative or choice in this matter.” (EPA-HQ-OAR-2009-0923-0800-1)

Comment:

“In the meanwhile 1% of every dollar that petroleum produces at the well head should go to a privately held, government regulated agency to develop new technologies in cleanup procedures.” (EPA-HQ-OAR-2009-0923-0801-1)

Comment:

“It makes no sense to me that individuals are held accountable for all of their actions but big corporations can perpetrate massive crimes against humanity and the environment that sustains us all and suffer no consequences. This travesty of justice MUST STOP!” (EPA-HQ-OAR-2009-0923-0802-1)

Comment:

“It is clear that a relationship has existed between big oil and the EPA which puts our country on the defensive. Actions such as this need to cease.

The enviromental disaster and economic disaster in the Gulf are due to greed....and need to be checked.

We are appalled that a government agency that is supposed to regulate is so lax.

It is time to put the American people first...not oil and gas lobbyists!” (EPA-HQ-OAR-2009-0923-0804-1)

Comment:

“As for the oil spill, They did it , they're responsible! Make them pay for the clean up, the environmental damage, AND THE FINANCIAL DAMAGE TO ALL THOSE FISHERMEN AND ANYONE ELSE ECONOMICALLY DAMAGED BY THEIR IRRESPONSIBLE ACTIONS!” (EPA-HQ-OAR-2009-0923-0805-1)

Comment:

“Please do ALL that you can to ensure that, while we don't shut off oil and gas exploration, we do make sure that these companies take all possible precautions to avoid another such disaster!! While we can all wish that it would not be necessary to continue exploration for oil and gas, we do live in the real world where gas and oil are still needed!! Accordingly, while we still keep using fossil fuels, please make every effort to support alternative sources of energy and explain to those who would block all efforts to move forward because they are afraid of change, or a degradation of their property values, or merely don't care, that the alternative is much too scary to contemplate !!!!!” (EPA-HQ-OAR-2009-0923-0808-1)

Comment:

“If they are to profit from oil, then they should be held accountable for the disasters that drilling creates.” (EPA-HQ-OAR-2009-0923-0811-1)

Comment:

“The profits of BP and other energy corporations are enormous. The costs of complying with pollution regulations (and now cleaning up THEIR pollution) are nothing to them. THEY must be responsible and NOT the government (us taxpayers).” (EPA-HQ-OAR-2009-0923-0813-1)

Comment:

“It is time to clean house! End the cozy Bush administration relationships between the government and the oil and gas industries, and give us clean government and transparency, please!” (EPA-HQ-OAR-2009-0923-0814-1)

Comment:

“BP should be held accountable for the whole disaster, financially and morally and it and its corporate officers should be tried in court. The oil will be fouling all life there for generations. It contributes to the Sixth Extinction we all currently suffer. The planet is in very deep trouble and it needs NO BP or any other oil corporations.” (EPA-HQ-OAR-2009-0923-0815-1)

Comment:

“We must hold these oil companies accountable. We can see from the Gulf mess that they don't even follow the minimal rules that they make up with their buddies in the Mineral Dept.” (EPA-HQ-OAR-2009-0923-0816-1)

Comment:

“Each day, watching the continuing and growing BP catastrophe in the Gulf, I am choked with grief and anger. Grief because the disaster looks set to destroy the entire ecosystem of the Gulf of Mexico, including vital coastal wetlands and fisheries. Anger because proper regulation and accountability-like a liability cap of 175 billion dollars instead of 175 million dollars, real supervision and inspection regimes instead of the corruption at the MMS - could have prevented this horrific ecocide. The fossil fuel industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0817-1)

Comment:

“Government of the people by the people? Or, government of the people by large corporations? Big oils' lobbying is, of course, self serving, and has nothing to do with the best interests of the country and the people. And how do they succeed in their lobbying? Well, the people don't really

know, do they? But somebody surely gains directly from the lobbying, don't they? And the people are now left to watch the bad results of this twisted government "arrangement", aren't they?" (EPA-HQ-OAR-2009-0923-0818-1)

Comment:

“Let us FINALLY stop subsidizing the big oil companies, kowtowing to their every whim, and stop letting them wreck the environment with impunity.” (EPA-HQ-OAR-2009-0923-0820-1)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

Such steps will assist our nation in converting to safe, non-polluting energy sources. This will not only help our air, water, and public health, but will help us reduce dangerous greenhouse gases.” (EPA-HQ-OAR-2009-0923-0822-1)

Comment:

“The oil companies must be accountable to us! They should fear our actions, not us theirs. I DEMAND they report their emissions and pay for their own pollution.” (EPA-HQ-OAR-2009-0923-0827-1)

Comment:

“Just clean up the mess, and send them the bill later.” (EPA-HQ-OAR-2009-0923-0829-1)

Comment:

“They have shown time and time again that they will not monitor themselves voluntarily. Please - this is what the government is there for - to protect us. If we do not protect the environment, we are not protecting ourselves.” (EPA-HQ-OAR-2009-0923-0830-1)

Comment:

“Any other company or person would be held accountable for such recklessness, why do we let this large corporations get away with all of this. The mining industry too. They get countless slaps on the wrists and then eventually some huge catastrophe happens. Agencies like your

should be held accountable too if you keep letting them off the hook like you have been. We NEED accountability and we need them to follow the rules. These kinds of slipups are ruining our one and only home.” (EPA-HQ-OAR-2009-0923-0832-1)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

How can any meaningful legislation be passed in congress without such information?” (EPA-HQ-OAR-2009-0923-0834-1)

Comment:

“I also strongly support EPA in its enforcement of the Clean Air Act, including CO2 emissions.” (EPA-HQ-OAR-2009-0923-0834-2)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. Even if the consumer ultimately pays for any such adjustment as this it is only right that we have a better idea of the true cost of these products and services - as we will all also pay the ultimate cost with our planet if we do not start to work on these issues” (EPA-HQ-OAR-2009-0923-0835-1)

Comment:

“Make sure that no other pollutants than oil will be dispersed in the gulf of Mexico. Oil is natural and can be reabsorbed by nature. More chemicals will effect the whole world by evaporating into the atmosphere.” (EPA-HQ-OAR-2009-0923-0836-1)

Comment:

“The oil and gas industry, which makes billions and even gets government subsidies, must be held accountable on protecting our environment and paying its share. No more deals!” (EPA-HQ-OAR-2009-0923-0839-1)

Comment:

“This is a matter of immense importance to all who live on or will live on Earth!” (EPA-HQ-OAR-2009-0923-0844-1)

Comment:

“As an American citizen living in Canada, I am appalled at how the oil and gas lobbies influence the government. The same goes for Canada. It is time to crack down on this industry and hold it accountable.” (EPA-HQ-OAR-2009-0923-0846-1)

Comment:

“Please change the laws to make Big Oil accountable for pollution and negligence. The BP oil disaster is just the reminder we need that if we ruin the ocean, we destroy ourselves. Please change now before it is too late.” (EPA-HQ-OAR-2009-0923-0849-1)

Comment:

“The oil and gas companies need to be responsible and meet greenhouse reporting as other industries do. Offshore and on shore companies cannot be excluded.

Now is the time to make necessary changes.” (EPA-HQ-OAR-2009-0923-0850-1)

Comment:

“I don't want another loophole for these corporations, they have slithered through enough of them already leaving the taxpayers to clean up and pay the bills.” (EPA-HQ-OAR-2009-0923-0851-1)

Comment:

“Watching the "Gulf Gusher" is saddening...a real damper on the citizens the USA that must bear the burden now and future generations...unbelievable that regulations are not in place. What a waste!” (EPA-HQ-OAR-2009-0923-0852-1)

Comment:

“Because of the recent events in the Gulf of Mexico, this may be the most important time in my lifetime and the history of this generation for all of us to take concrete stands in favor of protecting the environment.” (EPA-HQ-OAR-2009-0923-0853-1)

Comment:

“While it is regrettable that the EPA must appear to adopt an adversarial position with the oil and gas industry, all experience indicates that without this position the industry will continue to bend all the rules it can in its search for profits.” (EPA-HQ-OAR-2009-0923-0854-1)

Comment:

“I really need the P back in the EPA.

It needs teeth.

It needs to bite

It needs to do it's job that it was intended to do.

At this point you can't even enforce adequate and correct instillation of Booms and pumps on the largest oil spill in history. Much less protect the air and water we need to breath and drink.” (EPA-HQ-OAR-2009-0923-0855-1)

Comment:

“It is very clear, as the BP oil leak gushes away killing ALL marine life around the Gulf and continuing up the East Coast, that energy producing methods and practices MUST be thoroughly and totally under the control of the EPA. How sad is it that our government has allowed private industry with their profit incentives to set safety standards for drilling? How incredibly stupid is that??? Understood that the previous administration was in bed with oil and gas industries...but now that the WORST ENVIRONMENTAL DISASTER IN U.S. HISTORY is STILL happening, there is no choice in this matter any more. Every and all measures to stop ALL offshore drilling RIGHT NOW must be employed. There is no trusting anyone anymore...the earth has been damaged by this unchecked greed for oil. Only clean energy, solar, wind should be encouraged.” (EPA-HQ-OAR-2009-0923-0858-1)

Comment:

“If we are to move towards a sustainable energy future, the oil and gas industry must be held accountable for their effects on the environment and the actual cost of producing oil and gas.” (EPA-HQ-OAR-2009-0923-0861-1)

Comment:

“We’ve already lost the Gulf Coast and all the animals and birds that once lived there. Thanks to carelessness and greed, it will never come back. We need the strongest regulatory system possible and we need to transition out of the use of oil and gas while there is still any part of our planet left. I cannot think of a time that I have been as sick or as angry as I am about what has happened in the Gulf Coast. And all because of greed and failure to regulate.” (EPA-HQ-OAR-2009-0923-0862-1)

Comment:

“When are we going to STOP the lobbying!!!! Regardless of who I voted for I now realize that it doesn't matter. The almighty dollar always wins no matter what and that includes whatever it takes even if it means destroying our beautiful Gulf. What disaster is on the next horizon that lobbying has prevented us from increasing/installing safety precautions.?????” (EPA-HQ-OAR-2009-0923-0864-1)

Comment:

“I am appalled at the magnitude of the BP Gulf spill and the inability of BP to both solve this problem and step up to accept full responsibility without working behind the scenes to limit its liability. I further urge the EPA to advocate within its jurisdictions for discontinuing all deep water oil exploration.” (EPA-HQ-OAR-2009-0923-0866-1)

Comment:

“Fairness is a highly regarded value in this country, and for way too long those who profit from corporate wealth and privilege have been allowed to avoid their rightful responsibilities. The EPA can take this step to insist that the oil and gas industry be held accountable. Standing up to the wealth and power bullies takes courage,,and every time the EPA holds the line and defends the planet it makes you heroes for those of us without that unfair influence. Stand strong on this, please!” (EPA-HQ-OAR-2009-0923-0867-1)

Comment:

“The oil and gas industry has a powerful hold on us. We can break free of that hold by releasing with held information that our government has about "FREE ENERGY"! YES- the technology has been with held from us so that we will be dependent on oil. Let's break the chains of this dependence.” (EPA-HQ-OAR-2009-0923-0868-1)

Comment:

“Also, I would like to see more regulation on offshore drilling. Canada and other countries require a second well to be drilled at the same time as the main well; this would/could have been used in the current disaster much sooner than waiting 3 months to drill the relief well.” (EPA-HQ-OAR-2009-0923-0869-1)

Comment:

“BP HAS COMMITTED A CRIME AGAINST US AND NATURE. TOSS THE BOSS' IN JAIL AND KILL THE CORPORATION BY ABOLISHING BP AS A CORPORATIION!!!” (EPA-HQ-OAR-2009-0923-0870-1)

Comment:

“People are going to be watching this huge mess, or should I say disaster, more and more and realize all the suffering, both wildlife and human, that has been caused by BP and their incompetence and lies. It reflects very badly on all Americans. I was also very disappointed when I heard President Obama say that Ken Salazar's job mwas safe. He never should have been put in his position in the first place.” (EPA-HQ-OAR-2009-0923-0871-1)

Comment:

“BP has clearly been incapable of the knowledge to control a drilling process they initiated. Therefore they should be prohibited from further drilling projects within US land or sea areas.” (EPA-HQ-OAR-2009-0923-0872-1)

Comment:

“I have studied wetlands and I know how important they are to surrounding ecosystems and local economies. That's why it has been sickening watching the oil gushing out of the BP well and seeing it come ashore. There is NO reason that BP, or any other oil company, should not be held accountable for all the damages a spill causes. If they own the oil and the profits, they should own damage and cleanup costs.” (EPA-HQ-OAR-2009-0923-0873-1)

Comment:

“As far as I am concerned, this is the time to make the transition to non fossil fuel energy. Put millions to work converting the sun, air and water to sustainable, clean energy for ALL our needs. Our sea is now ravaged by this oil spill catastrophe, which we all knew was a disaster about to happen. Our precious earth is writhing in agony due to our shortsightedness. We are overdue. We have let the moguls run America, as if it was their private playpen.

PUT AMERICA TO WORK! Make ALL cars electric or the equivalent. Convert ALL 'gas' stations to clean air facilities. Let's convert NOW and save the planet and the health of our children. END BIG OIL and COAL and all other unhealthy and destructive practices NOW, PLEASE.” (EPA-HQ-OAR-2009-0923-0875-1)

Comment:

“Creating new laws and regulations are fine -- but how about enforcing the ones currently on the books? How about having scientists with expertise as regulators and enforcement personnel? I am disgusted with the seemingly endless spectacle of "foxes guarding the henhouse."” (EPA-HQ-OAR-2009-0923-0876-1)

Comment:

“Please stop kicking the can down the road. Act with wisdom, human decency and responsibility for the benefit of ALL sentient beings.” (EPA-HQ-OAR-2009-0923-0878-1)

Comment:

“I am shocked at how cheaply you give away the natural world and how little you value clean air, water and land. You are supposed to be the holder of common sense and just actions with respect to our environment, you should all be ashamed of your lack of compassion, care or oversight. It is appalling. I as a tax paying American am sickened by the lack of courage you continue to show in the face of unacceptably bad behavior, nothing less than the future of this planet rests with your decisions, do the right thing, take your job seriously, act quickly. We are still counting on you to take the high road.” (EPA-HQ-OAR-2009-0923-0879-1)

Comment:

“This is absolutely absurd. Instead of using our money and technological resources to uses better, cleaner, and safer means of energy, we're now wasting it on having to clean up a spill that never should have happened. Oil must be stopped, especially when we have the use of other, more sustainable, resources.” (EPA-HQ-OAR-2009-0923-0880-1)

Comment:

“The American people need to know which of our public servants receive money from big oil and how much. As with the for-profit health industry and the banksters, the oil companies seem to be able to buy members of congress.” (EPA-HQ-OAR-2009-0923-0881-1)

Comment:

“It gives me no great pleasure to admonish those who gleefully labeled us treehuggers, because I do so at the cost of the Gulf of Mexico for my children's generation. Let's see, for the foreseeable future the only people who can afford an oyster plate or some shrimp cocktail are the people that caused this disaster. Greaaaaat.

They are lobbying away entire ecosystems, probably forever! SOMEONE NEEDS A JAIL SENTENCE, then we'll have a little less trouble with a greenhouse gas reporting rule. You better handle this because we will be watching.” (EPA-HQ-OAR-2009-0923-0882-1)

Comment:

“The BP disaster actually has the POTENTIAL to change life on earth as we know it! After unsuccessfully using its most likely attempts to stop the flow, it is at least possible that the flow will continue and gradually spread throughout the globe, destroying much - perhaps even all - marine wildlife, not to mention making the use of beaches for enjoyment impossible.

Another likely by-product would be the unelectibility of President Obama and many members of his party, which will be blamed for all this!

If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-0884-1)

Comment:

“PS- They should be fined for excessive emissions” (EPA-HQ-OAR-2009-0923-0886-1)

Comment:

“As an emeritus member of the American Institute of Biological Sciences (AIBS), I ask you to ensure that the system uses rigorous, detailed, direct pollution measurements, & that the oil & gas industry's emissions are included in the reporting system.” (EPA-HQ-OAR-2009-0923-0887-1)

Comment:

“what if you lived on the gulf coast and watched the ruination of your life.” (EPA-HQ-OAR-2009-0923-0888-1)

Comment:

“Why should people, animals, plants, and entire ecosystems suffer the consequences for the benefit of just a few multinational corporations? The American government is here to serve the American people and not Big Oil! As an American and human being on this planet I need clean air, clean water, healthy ecosystems, and alternatives to oil based energy. Please take a step in making this happen for me and all of the citizens of this planet. Hold polluters accountable! Thank you” (EPA-HQ-OAR-2009-0923-0889-1)

Comment:

“Profit is the only thing that motivates these corporations. If their profit is not affected, the same bad practices will continue” (EPA-HQ-OAR-2009-0923-0890-1)

Comment:

“I also want to see the EPA or the Coast Guard assemble a sizable inspection team competent to evaluate rig operations and begin rigorous, random and unannounced inspections of the operations on all offshore operations of the oil companies. This "accident" was the result of management greed and arrogance. I also want to see violators subject to criminal penalties” (EPA-HQ-OAR-2009-0923-0891-1)

Comment:

“HOLD OIL/GAS/COAL INDUSTRY ACCOUNTABLE” (EPA-HQ-OAR-2009-0923-0892-1)

Comment:

“Thank you for your work in improving accountability for greenhouse gas emissions, for launching a 2-year study of the impact of shale gas drilling on our water resources, and other advances in environmental protection since you were appointed. Of course, there's still work to be done” (EPA-HQ-OAR-2009-0923-0893-1)

Comment:

“Please tell President Obama that he must take charge of this oil mess. This is like our third War Front” (EPA-HQ-OAR-2009-0923-0894-1)

Comment:

“The oil rig is flagged the Marshall Islands??? Stop this” (EPA-HQ-OAR-2009-0923-0895-1)

Comment:

“Thank you for your attention to one of the greatest issues ever facing mankind” (EPA-HQ-OAR-2009-0923-0896-1)

Comment:

“end deregulation !!!!!!! bring on responsible government. it's obvious that big business cannot be trusted” (EPA-HQ-OAR-2009-0923-0897-1)

Comment:

“What happened the Gulf affects everyone. We don't need to have another disaster like this” (EPA-HQ-OAR-2009-0923-0898-1)

Comment:

“Stop the coziness that occurs between government and business! We have had enough destruction by greedy companies” (EPA-HQ-OAR-2009-0923-0899-1)

Comment:

“Please don't let the oil companies continue to avoid accountability” (EPA-HQ-OAR-2009-0923-0900-1)

Comment:

“Please realize that your children and grandchildren will be affected with your choice ...as well as the rest of the planet” (EPA-HQ-OAR-2009-0923-0901-1)

Comment:

“The oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-0902-1)

Comment:

“Furthermore, oil and gas industry facilities, both land and water based, should be subject to the same ground/water pollution standards as any other industry. All sites should be subject to strict monitoring as landfills and paper mills are. Whenever any spill or illegal discharge is discovered, they must be forced to clean up the damage, be levied a punitive fine, and be forced to pay damages to locals affected by the damage. They cannot be allowed to buy their way out of paying damages. Furthermore, any such efforts should be considered obstruction of justice.

Only when the oil and gas industry is properly regulated can the people, and the environment, be safe from irreparable damages” (EPA-HQ-OAR-2009-0923-0903-1)

Comment:

“Please read the following and take it to heart. We need help!” (EPA-HQ-OAR-2009-0923-0904-1)

Comment:

“NO ONE SHOULD BE ALLOWED TO JEOPARDIZE THE HEALTH AND WELL BEING OF OTHERS OR THE PLANET. no one skydives w\o a parachute and a backup parachute. that they were allowed to drill w\o a safety net or backup plan is incredulous” (EPA-HQ-OAR-2009-0923-0905-1)

Comment:

“We appreciate your efforts in the BP oil disaster, but I hope you begin exercising some muscle tp stop BP from using toxic dispersants, which are only intended to cover up their mistake. Those dispersants are likely to be much more toxic to the ocean than the oil, and will make it tough to clean up the oil because it makes it less visible. Most of us know a self-serving action when we see it. Please institute any all legal efforts to stop BP from exacerbating the growing problem.” (EPA-HQ-OAR-2009-0923-0906-1)

Comment:

“Enough is enough -- it is time to hold Big Oil accountable!” (EPA-HQ-OAR-2009-0923-0908-1)

Comment:

“It's past due time to get real and use common sense on these issues-if these companies want to drill, they must use the best, safest, cleanest tech available; fail and they pay, plain and simple!” (EPA-HQ-OAR-2009-0923-0909-1)

Comment:

“ENOUGH of allowing these mega-billion dollar corporations to pillage and destroy the world we ALL inhabit. And this isn't even to mention the earth we're passing onto our grandchildren and great grandchildren. The immunity of the gas and oil corporations is abominable. Time for the game to be up, and to serve all the little people who are the ones who really keep this country afloat” (EPA-HQ-OAR-2009-0923-0910-1)

Comment:

“Hold British Petroleum 100% accountable for the Deepwater Horizon disaster” (EPA-HQ-OAR-2009-0923-0911-1)

Comment:

“It is absolutely unconscionable that the oil industry is so unaccountable for its actions. And it is even worse that Republicans in Congress want to continue to go to bat for them and refuse to vote for regulations that would hold them in check. Of course, our regulatory agencies must not be staffed by oil industry lackeys, who do their bidding. Let's clean house and make the oil and gas industries accountable for their actions” (EPA-HQ-OAR-2009-0923-0912-1)

Comment:

“It's outrageous that we have to ask just to get a measurement of the customary emissions from oil and gas operations, when the largest gas and oil discharge in US history is presently raging in the Gulf of Mexico. The long list of blowouts on Wikipedia, and the recent deja-vu expose on Rachael Maddow make it clear that we need a totally different approach. The idea of "holding them accountable" after these tragic events is ludicrous. These risks are too great. There is no commensurate level of accountability. I hold the US government accountable for not already shutting down these unmitigatable practices. The Cheney/Bush administration is most to blame, but the Obama administration has had enough time to fix this. Where is the outrage? Relying on hope to fix this is truly audacious.” (EPA-HQ-OAR-2009-0923-0913-1)

Comment:

“Please do something, anything. This Companies are the True Ecoteroists, what they are doing is criminal. I would suggest that you watch a Movie called Crude about Ecquador” (EPA-HQ-OAR-2009-0923-0914-1)

Comment:

“It is an outrage that they have been allowed to sidestep mandatory greenhouse gas reporting. We need a clear picture of what's doing on with our environment, and pollution from ALL sources needs to be accounted for. Thank you so much for your decision to rein in these environmental terrorists organizations. Much more needs to be done, but this is a good first step. We need to let them know "We are watching, we know what you are doing".” (EPA-HQ-OAR-2009-0923-0915-1)

Comment:

“I know you have to be as horrified by the oil spill in the Gulf as the rest of us are. You are in a fortunate position of power, able to hold accountable the oil and gas industry for the TRUE impact that they have on the earth, including the far-reaching impacts of global warming.” (EPA-HQ-OAR-2009-0923-0916-1)

Comment:

“We are also shocked by the extraordinary myopic view of these industries. Don't they too have children they would wish to protect? Don't they know that the harm they are causing the planet does not exempt their own children, and grandchildren, and all other sentient creatures living on this planet? Their intention to drill and pursue their own lust for profit can only be carried out by the conscious decision to deceive all other planetary citizens. We will not, must not, allow it.” (EPA-HQ-OAR-2009-0923-0917-1)

Comment:

“Exemptions are what can cause the most harm! Huge corporations are aware of this but because they are so profit-driven, will buy their way out of having to comply with laws or regulations they don't like.” (EPA-HQ-OAR-2009-0923-0918-1)

Comment:

“As we sit a helplessly watch the largest oil spill in history to foul our shores, rob the oceans of oxygen and kill out fish the anger and frustration is palpable. These companies responsible for this disaster have received tax breaks and sweetheart oil leases for years. They have derived vast profits for these cosy relationships with government regulatory agencies. It is very simple oil and

gas industry must be held accountable with no limit to their liability because there seems to be no limit to their damage.” (EPA-HQ-OAR-2009-0923-0919-1)

Comment:

“And I really want to know why the American taxpayers are the ones paying for this disaster and not the BP company itself???” (EPA-HQ-OAR-2009-0923-0920-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held unequivocal accountable” (EPA-HQ-OAR-2009-0923-0921-1)

Comment:

“Please - don't let the oil & gas industry lobbyists ruin our planet for our grandkids and future generations. We need to find healthier and more natural ways of obtaining energy for our needs.” (EPA-HQ-OAR-2009-0923-0922-1)

Comment:

“The oil and gas lobby has too much power, and last year it lobbied its way out of the greenhouse gas reporting rule, which would have recorded its disastrous global warming pollutant emissions.

We have now had a disaster related in part to ignorance of these emissions.

The EPA is proposing to include the offshore and onshore oil and gas industry in the system. I strongly support that decision. If we are to avoid more and worse Deepwater Horizon disasters, one after another, the system needs to use rigorous, detailed, and direct pollution measurements, and include the industry's emissions in the reports as soon as possible” (EPA-HQ-OAR-2009-0923-0923-1)

Comment:

“Industries must be held accountable for their actions and inactions. Cost for cleaning up after their screw ups and compensations for damages must be borne by the companies that caused the problems, not the taxpayers” (EPA-HQ-OAR-2009-0923-0924-1)

Comment:

“Thank you for all the good work you do. Continue to stand up for a better environment. Without you, this country would look like China and the Ukraine” (EPA-HQ-OAR-2009-0923-0925-1)

Comment:

“Also, I urge you to work with the president and his administration to direct sizable funds for scientific and technical research into non-combustion types of sources of energy generation, such as electrochemistry, solar, and aeolic, among other promising technologies..

Thank you for your work and collaboration.” (EPA-HQ-OAR-2009-0923-0926-1)

Comment:

“This is a terrible and irresponsible way to treat the only planet we have! Please help fix this problem” (EPA-HQ-OAR-2009-0923-0927-1)

Comment:

“I think as a species we have become more enlightened over the centuries as to what is meaningful and fulfilling to our lives. But it's a slow progress, and we still predominantly act on the issues that most matter to us with a "crisis management" approach. It's not that difficult to envision consequences of actions and be proactive if you can factor out the greed. the main culprit.

Why with all the technology and sensational entertainment that is available do people still show up in record numbers at national parks, seashores, and any places of natural peace and beauty? Why do children's fondest memories still center around the simplest times spent in nature when they are given that opportunity? Why do the rich and priveleged segregate themselves in the most beautiful natural spots in the world ?

We CANNOT afford to procrastinate on this regulation and conversion to cleaner energy for reasons of sheer physical and cultural survival as a species. This is not drama ...this is reality. Please provide leadership and I pray that you and all others find the courage to decide and act in the interest of long term prosperity” (EPA-HQ-OAR-2009-0923-0928-1)

Comment:

“What is happening in the Gulf of Mexico today is nothing short of a disaster. But when an oil company has a spill, it is clear for the whole world to see; and I trust that BP will be held responsible for the devastation that this spill is causing. Unfortunately, when it comes to the world wide impact of climate change, the vast emissions generated by the oil and gas industry are not clear for the whole world to see. Indeed, they are not tracked at all.” (EPA-HQ-OAR-2009-0923-0929-1)

Comment:

“The oil and gas industry must be held accountable and not be allowed to lobby its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. Please include the offshore -- and onshore -- oil and gas industry in this reporting rule.” (EPA-HQ-OAR-2009-0923-0930-1)

Comment:

“This kind of situation must be prevented from happening again. Please make sure to put all measures in place to keep our environment safe from future oil spills” (EPA-HQ-OAR-2009-0923-0931-1)

Comment:

“It is disgraceful that BP has been allowed to lie, lie, lie from the first day of the spill. Why wasn't the new method for stopping the spill tried the first day, why all of the foot dragging. Why was there so much neglect, no oversight, and so little information given through the media as to the real devastation of our gulf.” (EPA-HQ-OAR-2009-0923-0933-1)

Comment:

“I am tired of this industry getting away with whatever they want. If anyone patents anything that will save gas, they buy the patent so no one can use it. They don't mind harming the people as well as the environment and it needs to stop--NOW!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-0934-1)

Comment:

“I also feel that all companies making money off of the oil rigs are held financially responsible for the leaks, etc. In the case of the BP mess in the Gulf, why aren't TransOcean and Halliburton being charged up the wazoo??? Halliburton has been bleeding this nation blind for some ten years now (the Bush/Cheney era put them in the drivers seat to get any and all government contracts with out bidding for them). I would love to see them finally have to pay for something!!!” (EPA-HQ-OAR-2009-0923-0936-1)

Comment:

“If you have not seen the Rachel Maddox piece on the identical oil catastrophes that occurred in the 1970's. down to the same solutions enacted then that are being repeated now with similar

non-success, please go to You Tube and watch it. The industry has not improved on its disaster technology over the past 31 years.

Accountability and right action are the only logical recourse. Please be insistent that BP and all parties involved do the right thing.” (EPA-HQ-OAR-2009-0923-0937-1)

Comment:

“The Global warming HOAX was a lie and every-one knows it, Did you not follow the made up-rules then. All over the world we know your socialist dream are at work. So stop trying to play this card it is dead. What you should do is TEAM up with Oil Companies and come up with an idea that will help, not drilling in dangerous places. Like on the earth in the US, We have a Oil Field in North Dakota (Baaken Oil Field) that could be developed into more oil then our so called Friends have ever sold to us.” (EPA-HQ-OAR-2009-0923-0941-1)

Comment:

“We also need to rely more on transit transportation solutions instead of focussing on fossil fuel dependent pavement projects like the South Fraser Freeway in BC, Canada. Those kinds of projects promote climate change with increased greenhouse gas emissions and need to be stopped.” (EPA-HQ-OAR-2009-0923-0942-1)

Comment:

“Enough is enough!

We need to get serious about employing alternate sources of energy.” (EPA-HQ-OAR-2009-0923-0943-1)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system.

I strongly support that decision!!!

I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

AND I URGE YOU TO END ALL OFFSHORE DRILLING NOW!!!” (EPA-HQ-OAR-2009-0923-0944-1)

Comment:

“This has gone on FAR too long! How long are we going to let the industry dictate to us and the rest of the world what should and should not be allowed? This would be a very positive step forward and in the right direction.” (EPA-HQ-OAR-2009-0923-0945-1)

Comment:

“What will it take to rein in the oil and gas czars?! Most of those lobbying now for no control are doing it soely for their own profit motive; they will be dead of natural causes before the world dies from their unnatural damage, It is up to the present to see this is not the future. And it is job/duty of the EPA to take the action they were created to take; protect future generations, not present polluters.” (EPA-HQ-OAR-2009-0923-0949-1)

Comment:

“We cannot count on every business to conduct their business responsibly on every occasion. Thus we need to make sure that they are conduct their business in a responsible manner, and that way is to establish regulations that require it, and then carefully enforce them.” (EPA-HQ-OAR-2009-0923-0951-1)

Comment:

“This is the era of transparency. The citizens of the world insist on knowing the true costs of drilling oil and gas. Let's close the loop hole that hides the industries greenhouse gas emissions.” (EPA-HQ-OAR-2009-0923-0952-1)

Comment:

“It is high time for the government to make sure this reporting system includes offshore and onshore oil and gas in the system, now! . Please, we need and deserve this information!” (EPA-HQ-OAR-2009-0923-0953-1)

Comment:

“It is unthinkable that an industry responsible for much of what causes global climate would be exempt from accountability for their practices.” (EPA-HQ-OAR-2009-0923-0966-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0967-1)

Comment:

“I urge the EPA to monitor these offshore- and onshore- oil drilling polluters. We must protect our environment and stop bending rules for the big money lobbyists that represent these companies. It is time the representatives we send to Washington started to represent us!!!! Big oil is making billions of dollars of profit each year at the expense, of future generations, to enjoy planet earth and all of her living things. NO MORE BIG BUSINESS AS USUAL.” (EPA-HQ-OAR-2009-0923-0967-2)

Comment:

“Clearly, it's time that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0969-1)

Comment:

“Also, do not forget to initiate Federal Guidelines for ash ponds.

Our local PSC is allowing the filthy coal people to build a coal plant here in Kemper County Mississippi. We the people will be building this plant on our backs, not theirs.” (EPA-HQ-OAR-2009-0923-0973-1)

Comment:

“Let this DISASTER.....BE our collective wake-up scream.....this IS the time to stand Against the status quo regarding these profit-over-consequence oil companies!! 'ThePeople' Want things to Change.....we will Cheer Your courage, and support Your standing up to them...” (EPA-HQ-OAR-2009-0923-0975-1)

Comment:

“We must control the companies which obviously have no ethical or moral principals to control themselves. They are destroying our environment for obscenely large profits.” (EPA-HQ-OAR-2009-0923-0976-1)

Comment:

“Who gave the oil companies the right to put the gulf in such jeopardy while making billions in profits?! If they want the money, they have to have the responsibility as well. The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0977-1)

Comment:

“Yes, Big oil needs to take responsibility for all its actions!” (EPA-HQ-OAR-2009-0923-0978-1)

Comment:

“We as a people and our government have clearly been lax in our supervision of companies like BP. Our President, the people of the US, including the Gulf states, believed that the companies who drilled would have the wherewithal to keep it safe and to immediately deal with the aftermath if the unthinkable should happen. Apparently our oversight groups in government felt exactly the same. We have all been proven wrong and we need to be awake now and take action to prevent this from happening again.” (EPA-HQ-OAR-2009-0923-0981-1)

Comment:

“Giving special treatment to one industry makes it harder on others. What about the fishing industry who've been devastated by the oil spill? Or the tourist industry who feel the repercussions of pollution?”

For our health and for the economic well-being of our country, we need to make sure that ALL industries are fairly treated while also putting the welfare of our citizens first. It will only make our country STRONGER to have strong, fair regulations in place!” (EPA-HQ-OAR-2009-0923-0984-1)

Comment:

“I Clearly, the gas and oil industry has demonstrated with the debacle in the Gulf, that they must be forced to be accountable for the pollution which they generate. The “anything you want” ERA under Bush and Chaney has left us a legacy of lax safety preparations, no solutions for major disasters, and no oversight of this industry, and this must be changed!! We have already lost irreplaceable things in the Gulf of Mexico, because of poor planning before permits were issued!! We also should put a permanent moratorium on off shore drilling- there is no real “safe” way to do this!! We must wean ourselves away from fossil fuels, not keep drilling until every last drop is extracted!” (EPA-HQ-OAR-2009-0923-0986-1)

Comment:

“Stop Big Oil.” (EPA-HQ-OAR-2009-0923-0987-1)

Comment:

“IT'S WAY PAST TIME TO START DOING WHAT YOU WERE CHARTERED TO DO! If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-0989-1)

Comment:

“Please don't let the oil industry off the hook!! Our environment, fishing industry jobs and the health of people's lives are all threatened by the recent oil spill.” (EPA-HQ-OAR-2009-0923-0990-1)

Comment:

“to be so greedy and hold onto the profits without taking care of maintenance or safety concerns and ignoring responsibilities is a real dirty shame and should be held accountable for. to knowingly run the risk of casualties and disaster is premeditated criminal action and unforgivable. you never should disregard human or any life and keep profiting from a resource as old as time that is now polluting our fragile and already weakened ecosystem, it is so heartbreaking to see so many ruining our world even though their own families will have to suffer the consequences. they think only of money and not caring for and loving our planet with all their hearts and using that money in the right way and cleaning up the mess and finding a way to repay for the insane destruction of innocent life.” (EPA-HQ-OAR-2009-0923-0991-1)

Comment:

“Kansas has been behind the curve in acknowledging the threat of Greenhouse emissions. Many of our elected officials(national and local) have had their heads in the sand for a decade or more and are only just beginning to take the measure of changing public opinion as they re-think their positions. We all need a strong set of measurable guidelines that govern the actions of all who would pollute the air we breath.” (EPA-HQ-OAR-2009-0923-0992-1)

Comment:

“The federal investigators must have access to the spill area--does BP own the ocean? Outrageous!! Take action or the planet will be destroyed.” (EPA-HQ-OAR-2009-0923-0993-1)

Comment:

“Let's take this opportunity to put our billions in profits to support the one export America is still proud of: innovation. If we put this much effort and funding into building green energy alternatives we wouldn't be in this mess.” (EPA-HQ-OAR-2009-0923-0994-1)

Comment:

“I think you listen to 'the people' and want to do the right thing.....so please don't let BP (and Massey, and so many other predators) get away with their criminal acts.” (EPA-HQ-OAR-2009-0923-0995-1)

Comment:

“JAIL THE BASTARDS OF BP,,,

IN FACT THE ONE CASE WHERE THIS LIBERAL IS OK WITH THE DEATH PENALTY, IS IN THE CASE OF CORPORATE OR GOVERNMENT OFFICIALS HAVE MADE DECISIONS THAT THEY KNOW WILL KILL PEOPLE, BUT THAT WILL MAKE PROFIT” (EPA-HQ-OAR-2009-0923-0996-1)

Comment:

“STOP BLOCKING FREE ENRGY FROM BEING AVAILABLE TO THE PUBLIC!!!!!!!!” (EPA-HQ-OAR-2009-0923-0997-1)

Comment:

“Please, we are counting on you to continue to be vigilant in monitoring the oil and gas industry, They have shown us that they are not interested in doing it themselves.” (EPA-HQ-OAR-2009-0923-0998-1)

Comment:

“Major oil companies have proved to be untrustworthy when it comes to taking care of our environment. They should be held to the same standards as other industries.” (EPA-HQ-OAR-2009-0923-0999-1)

Comment:

“I strongly approve EPAs April 2010, proposal that would require oil and gas producing equipment in the same basin to report emissions as one facility. Oil and gas emissions must be

aggregated and reported as one facility. I know that fugitive and vented emissions from oil and gas facilities are a significant source of greenhouse gas emissions in Texas. I suggest obtaining accurate emissions data from these facilities to create polity that reduces greenhouse gases.” (EPA-HQ-OAR-2009-0923-1008-1)

Comment:

“Please help people like me who were not given a voice and are forced to live within 100 feet of a natural gas Centralized Collection Facility and Compressor Station. The first of 23 wells that will begin to feed this site went online this past weekend. TCEQ has already been called due to a strong gas odor in the air. The odor lasted about an hour three different times within two days. This is just the first weekend. How much are we ultimately going to be exposed to. This facility is dangerously close to my home. One slight mistake could cost my family greatly.” (EPA-HQ-OAR-2009-0923-1008-3)

Comment:

“I've owned and operated a contract pumping company in Weld County, Colorado for 30 years. I've been truly blessed being able to do what I do for a living!! I've seen my industry go through alot of changes over the years, but especvially in the last 5 years. We as a industry embrase the changes that have been made to improve the quality of air, and decrease the amount of VOC's that are being emitted by our industry.” (EPA-HQ-OAR-2009-0923-1017-1)

Comment:

“I strongly encourage the Environmental Protection Agency (EPA) to adopt a supplemental rule to require the reporting of greenhouse gas (GHG) emissions from petroleum and natural gas systems.” (EPA-HQ-OAR-2009-0923-1023-1)

Comment:

“I am very disappointed that the proposed supplemental rulemaking does not require control of GHGs; rather it requires only that sources above certain threshold levels monitor and report emissions. Scientists have determined that reducing atmospheric carbon dioxide concentrations to below 350 parts per million (ppm) is necessary to preserve life as we know it. The EPA should establish a cap on GHG emissions that will quickly reduce the atmospheric concentration of carbon dioxide from the current 390 parts per million (ppm) to 350 ppm in order to avert catastrophic climate change. I strongly encourage the EPA to adopt strong regulations that will reduce GHG emissions to 50% below 1990 levels by 2020 and 90% or more below 1990 levels by 2050.

“As we peer into society's future, we--you and I, and our government--must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow.”

-- President Dwight D. Eisenhower

Thank you for finally proposing to require the reporting of GHG emissions from petroleum and natural gas systems. Please take the next step by regulating these emissions so that we can better preserve for future generations a climate similar to that under which modern civilization developed.” (EPA-HQ-OAR-2009-0923-1023-2)

Comment:

“This kind of environmental catastrophe has to STOP! We have one planet. It is our responsibility to PROTECT it, not to destroy it by their responsible actions of greedy individuals. It is OUR planet, NOT theirs to do with what they want. We CANNOT replace it!!” (EPA-HQ-OAR-2009-0923-1046-1)

Comment:

“Make the laws stronger and enforcement diligent and punishment severe.” (EPA-HQ-OAR-2009-0923-1049-1)

Comment:

“In addition, hydraulic fracturing of shale for gas and oil must end. We can't continue to pollute our air and water with this method. In Chippewa Falls, WI we are battling EOG and CSP, INC. as they will be processing 2.6 million tons of silica per year to shove down with chemicals, huge amounts of water and heaven knows what else into the depths of the earth to get out oil and gas, leaving wells and air polluted with benzene and other cancer causing chemicals for life to endure.

WE ARE KILLING OURSELVES WITH OUR OWN LACK OF REGULATIONS AND LACK OF OVERSIGHT. Some actions must be taken quickly to find alternative energy sources and get us back to reality. Everyone in this country should be fearful for their life right now due to the BP spill and the continuing endangerment to ALL of the chain of life!” (EPA-HQ-OAR-2009-0923-1051-1)

Comment:

“What the oil and gas industry does must be transparent in all phases of their work. You need to make sure this happens, because it is clear that they continue to hide what is going on in their operations.” (EPA-HQ-OAR-2009-0923-1052-1)

Comment:

“We know the answers and now we MUST hold them accountable for ALL the wrong they have done to God's Creation. You have the power to help all of the people around the world who want to work for change. For caring for God's earth and everything in it. You have heard the cries of the impoverished and the groaning of our earth and YOU can set the stage for dramatic change. And God will be able to say, "It is good." Peace and Joy to you and everyone fighting for God's earth.” (EPA-HQ-OAR-2009-0923-1067-1)

Comment:

“Help !!!!! We are in bad shape in Texas. Please help !!!!!” (EPA-HQ-OAR-2009-0923-1077-1)

Comment:

“GIVEN THE FACTS PROVING GROSS CORPORATE IRRESPONSIBILITY, YOU MUST MAKE SURE THAT THE INDUSTRY IS HELD TO THE HIGHEST STANDARDS POSSIBLE. IT IS INSANE THAT WE CITIZENS ARE RECYCLING, CONSERVING, TAKING CARE OF TOXIC WASTE, ETC.... WHILE THIS INDUSTRY BLITHELY DESTROYS THE ENVIRONMENT AND LIES ABOUT IT.

NOT ONLY SHOULD IT BE HELD FINANCIALLY LIABLE, IT MUST OWN UP TO ITS OWN (PROBABLY CRIMINAL) MISMANAGEMENT AND SHORT-SIGHTED STUPIDITY.” (EPA-HQ-OAR-2009-0923-1078-1)

Comment:

“1.0 EXECUTIVE SUMMARY

Natural gas production in the Barnett Shale region of Texas has increased rapidly since 1999, and as of June 2008, over 7700 oil and gas wells had been installed and another 4700 wells were pending. Gas production in 2007 was approximately 923 Bcf from wells in 21 counties. Natural gas is a critical feedstock to many chemical production processes, and it has many environmental benefits over coal as a fuel for electricity generation, including lower emissions of sulfur, metal compounds, and carbon dioxide.

Nevertheless, oil and gas production from the Barnett Shale area can impact local air quality and release greenhouse gases into the atmosphere. The objectives of this study were to develop an emissions inventory of air pollutants from oil and gas production in the Barnett Shale area, and to identify cost-effective emissions control options.

Emission sources from the oil and gas sector in the Barnett Shale area were divided into point sources, which included compressor engine exhausts and oil/condensate tanks, as well as fugitive and intermittent sources, which included production equipment fugitives, well drilling and fracing engines, well completions, gas processing, and transmission fugitives. The air pollutants considered in this inventory were smog-forming compounds (NO_x and VOC), greenhouse gases, and air toxic chemicals.

For 2009, emissions of smog-forming compounds from compressor engine exhausts and tanks were predicted to be approximately 96 tons per day (tpd) on an annual average, with peak summer emissions of 212 tpd. Emissions during the summer increase because of the effects of temperature on volatile organic compound emissions from storage tanks. Emissions of smog-forming compounds in 2009 from all oil and gas sources were estimated to be approximately 191 tpd on an annual average, with peak summer emissions of 307 tpd. The portion of those emissions originating from the 5-counties in the D-FW metropolitan area with significant oil and gas production was 165 tpd during the summer.

For comparison, 2009 emission inventories recently used by state and federal regulators estimated smog-forming emissions from all airports in the Dallas-Fort Worth metropolitan area to be 16 tpd. In addition, these same inventories had emission estimates for on-road motor vehicles (cars, trucks, etc.) in the 9- county Dallas-Fort Worth metropolitan area of 273 tpd. The portion of on-road motor vehicle emissions from the 5-counties in the D-FW metropolitan area with significant oil and gas production was 121 tpd, indicating that the oil and gas sector likely has greater emissions than motor vehicles in these counties.

The emission rate of air toxic compounds (like benzene and formaldehyde) from Barnett Shale activities was predicted to be approximately 6 tpd on an annual average, and 17 tpd during peak summer days. The largest contributors to air toxic emissions were the condensate tanks, followed by the engine exhausts.

In addition, predicted 2009 emissions of greenhouse gases like carbon dioxide and methane were approximately 33,000 tons per day of CO₂ equivalent. This is roughly equivalent to the expected greenhouse gas impact from two 750 MW coal-fired power plants. The largest contributors to the Barnett Shale greenhouse gas impact were CO₂ emissions from compressor engine exhausts and fugitive CH₄ emissions from all source types.

Cost effective control strategies are readily available that can substantially reduce emissions, and in some cases, reduce costs for oil and gas operators. These options include:

- use of "green completions" to capture methane and VOC compounds during well completions,
- phasing in electric motors as an alternative to internal-combustion engines to drive compressors,
- the control of VOC emissions from condensate tanks with vapor recovery units, and
- replacement of high-bleed pneumatic valves and fittings on the pipeline networks with no-bleed alternatives.” (EPA-HQ-OAR-2009-0923-1081-1)

Comment:

“2.2 Air Pollutants and Air Quality Regulatory Efforts

Oil and gas activities in the Barnett Shale area have the potential to emit a variety of air pollutants, including greenhouse gases, ozone and fine particle smog-forming compounds, and air toxic chemicals. The state of Texas has the highest greenhouse gas (GHG) emissions in the U.S., and future federal efforts to reduce national GHG emissions are likely to require emissions reductions from sources in the state. The three anthropogenic greenhouse gases of greatest concern, carbon dioxide, methane, and nitrous oxide, are emitted from oil and gas sources in the Barnett Shale area.

At present, air quality monitors in the Dallas-Fort Worth area show the area to be in compliance with the 1997 fine particulate matter (PM_{2.5}) air quality standard, which is 15 micrograms per cubic meter (µg/m³) on an annual average basis. In 2006, the Clean Air Scientific Advisory Committee for EPA recommended tightening the standard to as low as 13 µg/m³ to protect public health, but the EPA administrator kept the standard at the 1997 level. Fine particle air quality monitors in the Dallas-Fort Worth area have been above the 13 µg/m³ level several times during the 2000-2007 time period, and tightening of the fine particle standard by future EPA administrators will focus regulatory attention at sources that emit fine particles or fine particle-

forming compounds like NO_x and VOC gases.” (EPA-HQ-OAR-2009-0923-1081-2)

Comment:

“4.4 Perspective on the Scale of Barnett Shale Air Emissions

Barnett Shale oil and gas production activities are significant sources of air emissions in the north-central Texas area. To help put the levels of Barnett Shale emissions into context, recent government emissions inventories for the area were reviewed, and emission rates of smog precursor emissions were examined.

The Dallas-Fort Worth area is home to two large airports, Dallas Love Field and Dallas-Fort Worth International Airport, plus a number of smaller airports. A recent emissions inventory has estimated 2009 NO_x emissions from all area airports to be approximately 14 tpd, with VOC emissions at approximately 2.6 tpd, resulting in total ozone and particulate matter precursor emissions of approximately 16 tpd. [References 22-24] For comparison, emissions of VOC + NO_x in summer 2009 from just the compressor engines in the Barnett Shale area will be approximately 65 tpd, and summer condensate tanks emissions will be approximately 146 tpd. In 2009, even after regulatory efforts to reduce NO_x emissions from certain compressor engine types, Barnett Shale oil and gas emissions will be many times the airports' emissions.

Recent state inventories have also compiled emissions from on-road mobile sources like cars, trucks, etc., in the 9-county D-FW metropolitan area.⁽²⁵⁾ By 2009, NO_x + VOC emissions from mobile sources in the 9-county area were estimated by the TCEQ to be approximately 273 tpd. The portion of on-road motor vehicle emissions from the 5-counties in the D-FW metropolitan area with significant oil and gas production was 121 tpd (Denton, Tarrant, Parker, Johnson, and Ellis). As indicated earlier, summer oil and gas emissions in the 5-counties of the D-FW metropolitan area with significant oil and gas production was estimated to be 165 tpd, indicating that the oil and gas sector likely has greater emissions than motor vehicles in these counties (165 vs. 121 tpd).

Emissions of NO_x and VOC in the summer of 2009 from all oil and gas sources in the Barnett Shale 21- county area will exceed emissions from on-road mobile sources in the D-FW metropolitan area by more than 30 tpd (307 vs. 273 tpd).

Figure 7 summarizes summer Barnett Shale-related emissions, plus TCEQ emission estimates

from the airports and on-road mobile sources. Figure 8 presents annual average emissions from these sources.

Figure 7. Barnett Shale Activity, D-FW Area Airports, & Mobile Sources (Summer 2009 Emissions). [See attachment for figure]

Figure 8. Barnett Shale Activity, D-FW Area Airports, & Mobile Sources (Annual Average 2009 Emissions). [See attachment for figure]

5.0 EMISSIONS REDUCTION OPPORTUNITIES

The previous sections of this report have estimated the emission rates of ozone and particulate matter precursor compounds, air toxic compounds, and greenhouse gases from different oil and gas sources in the Barnett Shale area. For several of these source categories, off-the-shelf options are available which could significantly reduce emissions, resulting in important air quality benefits. Some of these emissions reductions would also result in increased production of natural gas and condensate, providing an economic payback for efforts to reduce emissions.

5.1 Compressor Engine Exhausts

Compressors in oil and gas service in the Barnett Shale perform vital roles, to either help get oil and gas out of the shale, to increase pressures of gas at the surface, and to provide the power for the large interstate pipeline systems that move high volumes of gas from production to processing and to customers. At present, most of the work to operate the compressors comes from natural gas-fired internal combustion engines, and these engines can be significant sources of emissions.

New TCEQ rules are scheduled to become effective in early 2009 and they will reduce NO_x, VOC, and other emissions from a subset of the engines in the Barnett Shale – those that are currently in the D-FW metropolitan area that had typically not reported into the Texas point source emissions inventory for major sources. These rules are a good first step in addressing emissions from these sources, which had previously gone unnoticed in state emission inventory and regulatory efforts.

However, engines outside the D-FW metropolitan area are not subject to the rule. And even within the metropolitan area, the rule will not have the effect of greatly reducing emissions in 2009 compared to 2007 levels, since growth in oil and gas production (and the new engines that are going to be required to power the growth) will begin to overtake the benefits that come from reducing emissions from the pre- 2009 fleet (see Table 14).

Two available options for reducing emissions from engines in the Barnett Shale area are: (1) extending the TCEQ 2009 engine regulation to all engines in the Barnett Shale, and (2) replacing internal combustion engines with electric motors as the sources of compression power.

i. Extending the 2009 Engine Rule to Counties Outside the D-FW Metropolitan Area

Regulations adopted by TCEQ for the D-FW metropolitan area and scheduled to take effect in early 2009 will limit NO_x emissions from engines larger than 50 horsepower. [Reference 7] Rich burn engines will be restricted to 0.5 g/hp-hr, lean burn engines installed or moved before June 2007 will be restricted to 0.7 g/hp-hr, an lean burn engines installed or moved after June 2007 will be limited to 0.5 g/hp-hr. Applying these rules to engines outside the metropolitan area would reduce 2009 NO_x emissions from a large number of engines, in particular, rich burn engines between 50 to 500 hp. Emissions of NO_x in 2009 from the engines outside the metropolitan area would drop by approximately 6.5 tpd by extending the D-FW engine rule, an amount greater than mobile source emissions in all of Johnson County (4 tpd), or more than 50% of the emissions from Dallas-Fort Worth International Airport (12.6 tpd).

Extending the D-FW engine rule to counties outside the metropolitan area would likely result in many engine operators installing NSCR systems on rich burn engine exhausts. These systems would not only reduce emissions of NO_x, but they would also be expected to reduce emissions of VOC, the other ozone and particulate matter precursor, by approximately 75% or greater.(26a) Additional co-benefits of NSCR installations would include lower emissions of organic HAP compounds like benzene and formaldehyde, lower emissions of methane, and lower emissions of carbon monoxide. The level of HAP, methane, and carbon monoxide control would also be expected to be 75% or greater with typical NSCR installations. [Reference 26a]

Analyses of NSCR installations and operating costs by numerous agencies have indicated that

the technology is very cost effective. For example, the Illinois Environmental Protection Agency estimated in 2007 that NSCR could control NO_x from 500 hp engines at approximately \$330/ton. [Reference 26b] The U.S. EPA in 2006 estimated that NSCR could control NO_x from 500 hp engines at approximately \$92 to 105/ton. [Reference 27] A 2005 report examining emissions reductions from compressor engines in northeast Texas estimated NO_x cost effectiveness for NSCR at \$112-183/ton and identified VOC reductions as an important cobenefit. [Reference 28] These costs are well under the cost effectiveness values of \$10,000 to \$20,000 per ton often used as upper limits in PM_{2.5}, ozone, and regional haze (visibility) regulatory programs. The simultaneous HAPs and methane removal that would occur with NSCR use provide further justification for extending the D-FW engine rule to counties outside the metropolitan area.

ii. Electric Motors Instead of Combustion Engines for Compressor Power

When considering NO_x, VOC, HAPs, and greenhouse gas emissions from compressor engines, it is important to understand that the work to move the gas in the pipelines is performed by the compressors, which by themselves produce no direct combustion emissions. The emissions come from the exhaust of the internal combustion engines, which are fueled with a small amount of the available natural gas. These engines provide the mechanical power to run the compressors. The 2007 TCEQ engine survey and the most recent point source emissions inventory indicate that installed compressor engine capacity throughout the Barnett Shale was approximately 1,400,000 hp in 2007, and capacity is likely to increase to over 2,100,000 hp by 2009.

As an alternative to operating the compressors in the Barnett Shale with millions of hp of natural gas burning-engines, the compressors could be operated with electrically-driven motors. The electrification of the wellhead and compressor station engine fleet in the Barnett Shale area has the potential to deliver significant reductions in emissions in North Central Texas. The use of electric motors instead of internal combustion engines to drive natural gas compressors is not new to the natural gas industry, and numerous compressors driven by electric motors are operational throughout Texas. Unfortunately, current regulations have not yet required their use in the Barnett Shale.

A few of the many examples of electrically-driven natural gas compressors, positive technical assessments, and industrial experience with their use in Texas and throughout the U.S., include:

- The Interstate Natural Gas Association of America: "One advantage of electric motors is they need no air emission permit since no hydrocarbons are burned as fuel. However, a highly reliable source of electric power must be available, and near the station, for such units to be considered for an application." [Reference 29]

- The Williams natural gas company: "The gas turbine and reciprocating engines typically use natural gas from the pipeline, where the electric motor uses power from an electric transmission line. Selection of this piece of equipment is based on air quality, available power, and the type of compressor selected. Typically electric motors are used when air quality is an issue." [Reference 30]

- JARSCO Engineering Corp.: "The gas transmission industry needs to upgrade equipment for more capacity. The new high-speed electric motor technology provides means for upgrading, at a fraction of the life cycle costs of conventional gas powered equipment." [Reference 31]

- Pipeline and Gas Journal, June 2007: "Important factors in favor of electric-driven compressor stations that should be considered in the feasibility analysis include the fact that the fuel gas for gas turbine compressor stations will be transformed into capacity increase for the electrically-driven compressor station, and will therefore add revenue to this alternative..." [Reference 32]

- Prime mover example: Installations in 2007 at Kinder Morgan stations in Colorado of +10,000 hp electric-driven compressor units. [Reference 33]

- Wellhead example: Installations in Texas of wellhead capacity (5 to 400 hp) electrically-driven compressors. [References 34, 35]

- Mechanical Engineering Magazine, December 1996: "Gas pipeline companies historically have used gas-fired internal-combustion engines and gas turbines to drive their compressors. However, this equipment emits nitrogen oxides....According to the Electric Power Research Institute, it is more efficient to send natural gas to a combined-cycle power plant to generate electricity transmitted back to the pipeline compressor station than to burn the natural gas directly in gas-fired compressor engines." [Reference 36]

- The Dresser-Rand Corporation: "New DATUM-C electric motor-driven compressor provides quiet, emissions free solution for natural gas pipeline applications – An idea whose time had come." [Reference 37]

- Occidental Oil and Gas Corporation: "Converting Gas-Fired Wellhead IC Engines to Electric Motor Drives: Savings \$23,400/yr/unit." [Reference 38]

The use of an electric motor instead of a gas-fired engine to drive gas compression eliminates combustion emissions from the wellhead or compressor station. Electric motors do require electricity from the grid, and in so far as electricity produced by power plants that emits pollutants, the use of electric motors is not completely emissions free. However, electric motor use does have important environmental benefits compared to using gas-fired engines.

Modern gas-fired internal-combustion engines have mechanical efficiencies in the 30-35% range, values that have been relatively static for decades. It is doubtful that dramatic increases in efficiency (for example, to 80 or 90%) are possible anytime in the near future. This means that carbon dioxide emissions from natural gas-fired engines at wellheads and compressor stations are not likely to drop substantially because of efficiency improvements. In addition, the scrubbing technology that is used in some large industrial applications to separate CO₂ from other gases also is unlikely to find rapid rollout to the thousands of comparatively-smaller exhaust stacks at natural gas wellheads and compressor stations. The two facts combined suggest that the greenhouse gas impacts from using internal combustion engines to drive compressors are likely to be a fixed function of compression demand, with little opportunity for large future improvements.

In contrast, the generators of grid electric power are under increasing pressure to lower greenhouse gas emissions. Wind energy production is increasing in Texas and other areas. Solar and nuclear power projects are receiving renewed interest from investors and regulators. As the electricity in the grid is produced by sources with lower carbon dioxide emissions, so then the use of electric motors to drive natural gas pipelines becomes more and more climate friendly.

Stated another way, carbon dioxide emissions from gas-fired engines are unlikely to undergo rapid decreases in coming years, whereas the electricity for operating electric motors is at a likely carbon-maximum right now. Electric-powered compression has a long-term potential for decreased climate impact, as non-fossil fuel alternatives for grid electricity generation expand in

the future.

Costs: Estimates were made of the costs were switching from IC engines to electric motors for compression. Costs at sites in the Barnett Shale are highly time and site specific, depending on the cost of electricity and the value of natural gas, the numbers of hours of operation per year, the number and sizes of compressors operated, and other factors.

For this report, sample values were determined for capital, operating and maintenance, and operating costs of 500 hp of either IC engine capacity or electric motor capacity for a gas compressor to operate for 8000 hours per year at a 0.55 load factor. Electric power costs were based on \$8/month/kW demand charge, \$0.08/kWh electricity cost, and 95% motor mechanical efficiency. Natural gas fuel costs were based on \$7.26/MMBtu wellhead natural gas price and a BSFC of 0.0085 MMBtu/hp-hr.

With these inputs, the wellhead value of the natural gas needed to operate a 500 hp compressor with an IC engine for 1 year is approximately \$136,000. This is lower than the costs for electricity to run a comparable electric motor, which would be approximately \$174,000. In addition to these energy costs, it is important to also consider operating and maintenance (O&M) and capital costs. With an IC engine O&M cost factor of \$0.016/hp in 2009 dollars, O&M costs would be approximately \$35,000. With an electric motor O&M cost factor of \$0.0036/kWh in 2009 dollars, O&M costs would be approximately \$6200, providing a savings of nearly \$30,000 per year in O&M costs for electrical compression, nearly enough to compensate for the additional energy cost incurred from the additional price premium on electricity in Texas compared to natural gas.

With an IC engine capital cost factor of \$750/hp in 2009 dollars, the cost of a 500 hp compressor engine would be approximately \$370,000. With an electric motor cost factor of \$700/kW, the cost of 500 hp of electrically-powered compression would be approximately \$260,000.

The combined energy (electricity or natural gas), O&M, and capital costs for the two options are shown in Table 22, assuming a straight 5-year amortization of capital costs. The data show that there is little cost difference in this example, with a slight cost benefit of around \$12,000/year for generating the compression power with an electric motor instead of an IC engine. While this estimate would vary from site to site within the Barnett Shale, there appears to be cost savings, driven mostly by reduced initial capital cost, in favor of electrical compression in the Barnett

Shale. In addition to the potential cost savings of electrical compression over engine compression, the lack of an overwhelming economic driver one way or the other allows the environmental benefits of electric motors over combustion engines to be the deciding factor on how to provide compression power in the area.

Table 22. Costs of IC Engine and Electric Motor Compression [example of 500 hp installed capacity].

Column 1: [Blank]

Row 1: energy (NG or electricity)

Row 2: O&M

Row 3: capital

Row 4: Total

Column 2: IC Engine (\$/year)

Row 1: 136,000

Row 2: 35,000

Row 3: 74,000

Row 4: 245,000

Column 3: Electric Motor (\$/year)

Row 1: 174,000

Row 2: 6,200

Row 3: 52,000

Row 4: 232,000

5.2 Oil and Condensate Tanks

Oil and condensate tanks in the Barnett Shale are significant sources of multiple air pollutants, especially VOC, HAPs, and methane. Multiple options exist for reducing emissions from oil and condensate tanks, including options that can result in increased production and revenue for well operators. [Reference 14] This section will discuss two of these options: flares and vapor recovery units.

i. Vapor Recovery Units

Vapor recovery units (VRU) can be highly effective systems for capturing and separating vapors and gases produced by oil and condensate tanks. Gases and vapors from the tanks are directed to the inlet side of a compressor, which increases the pressure of the mixture to the point that many of the moderate and higher molecular weight compounds recondense back into liquid form. The methane and other light gases are directed to the inlet (suction) side of the well site production compressors to join the main flow of natural gas being produced at the well. In this way, VRU use increases the total production of gas at the well, leading to an increase in gas available for metering and revenue production. In addition, liquids produced by the VRU are directed back into the liquid phase in the condensate tank, increasing condensate production and the income potential from this revenue stream. Vapor recovery units are estimated to have control efficiencies of greater than 98%. [Reference 14]

The gases and vapors emitted by oil and condensate tanks are significant sources of air pollutants, and the escape of these compounds into the atmosphere also reduces income from hydrocarbon production. With a wellhead value of approximately \$7/MMBtu, the 7 tpd of methane that is estimated to be emitted in 2009 from condensate tanks in the Barnett Shale have a value of over \$800,000 per year. Even more significantly, a price of condensate at \$100/bbl makes the 30 tpd of VOC emissions in 2009 from the tanks in the Barnett Shale potentially worth over \$10 million per year.

While flaring emissions from tanks in the Barnett Shale would provide substantial environmental benefits, especially in terms of VOC and methane emissions, capturing these hydrocarbons and directing them into the natural gas and condensate distribution systems would provide both an environmental benefit and a very large potential revenue stream to oil and gas producers.

ii. Enclosed Flares

Enclosed flares are common pollution control and flammable gas destruction devices. Enclosed flares get their name because the flame used to ignite the gases is generated by burner tips installed within the stack well below the top. The flames from enclosed flares are usually not visible from the outside, except during upset conditions, making them less objectionable to the surrounding community compared to open (unenclosed) flares.

Using a flare to control emissions from tanks involves connecting the vents of a tank or tank battery to the bottom of the flare stack. The vapors from oil and condensate tanks are sent to the flare, and air is also added to provide oxygen for combustion. The vapors and air are ignited by natural gas pilot flames, and much of the HAP, VOC, and methane content of the tank vapors can be destroyed. The destruction efficiency for flares can vary greatly depending on residence time, temperature profile, mixing, and other factors. Properly designed and operated flares have been reported to achieve 98% destruction efficiencies.

Applying 98% destruction efficiency to the Barnett Shale oil and condensate tanks emissions estimates shown in Table 16 results in potential emission reductions of 30 tpd of VOC, 0.6 tpd of HAPs, and 7 tpd of methane. These reductions are substantial and would provide large benefits to the ozone and PM precursor, HAPs, and greenhouse gas emission inventory of the Barnett Shale area. The use of flares, however, also has several drawbacks. One of these is that tank vapor flares need a continuous supply of pilot light natural gas, and reports have estimated pilot light gas consumption at around 20 scfh/flare. [Reference 14]

Table 23 presents a summary of the results of an economic analysis performed in 2006 by URS Corporation for using flares or vapor recovery units to control emissions from a tank battery in Texas. [Reference 14] Capital costs were estimated by URS with a 5-year straightline amortization of capital. Flow from the tank battery was 25Mscf/day and VOC emissions were approximately 211 tpy. Costs were in 2006 dollars.

Table 23. Economics of Flares and Vapor Recovery Units.

Column 1: Control Option

Row 1: Enclosed Flare

Row 2: VRU

Column 2: Total Installed Capital Cost (\$)

Row 1: 40,000

Row 2: 60,000

Column 3: Annual Installed Operating Cost (\$/yr)

Row 1: 8000

Row 2: 12000

Column 4: Operating Cost (\$/yr)

Row 1: 900

Row 2: 11,400

Column 5: Value Recovered (\$/yr)

Row 1: NA

Row 2: 91,300

Column 6: VOC Destruction Cost Effectiveness (\$/ton VOC)

Row 1: 40

Row 2: (\$320)*

*VRU produces positive revenue, resulting in zero cost for VOC control, after accounting for value of recovered products.

The URS analysis indicated that flares were able to cost effectively reduce VOC emissions at \$40/ton, while VRU units produced no real costs and quickly generated additional revenue from the products recovered by VRU operation. There was a less-than 1 year payback on the use of a VRU system, followed by years of the pollution control device becoming steady revenue source.

5.3 Well Completions

Procedures have been developed to reduce emissions of natural gas during well completions. These procedures are known by a variety of terms, including "the green flowback process" and "green completions." [References 39, 40] To reduce emissions, the gases and liquids brought to the surface during the completion process are collected, filtered, and then placed into production pipelines and tanks, instead of being dumped, vented, or flared. The gas cleanup during a "green" completion is done with special temporary equipment at the well site, and after a period of time (days) the gas and liquids being produced at the well are directed to the permanent separators, tanks, and piping and meters that are installed at the well site. Green completion methods are not complex technology and can be very cost effective in the Barnett Shale. The infrastructure is well-established and gathering line placement for the initial collection of gas is not a substantial risk since wells are successfully drilled with a very low failure rate.

Emissions during well completions depend on numerous site-specific factors, including the pressure of the fluids brought to the surface, the effectiveness of on-site gas capturing equipment, the control efficiency of any flaring that is done, the chemical composition of the gas and hydrocarbon liquids at the drill site, and the duration of drilling and completion work before the start of regular production.

Some recent reports of the effectiveness of green completions in the U.S. are available, including one by the U.S. EPA which estimated 70% capture of formerly released gases with green completions, and another report by Williams Corporation which found that 61% to 98% of gases formerly released during well completions were captured with green completions. [References 40-41] Barnett Shale producer Devon Energy is using green completions on its wells, and they reported \$20 million in profits from natural gas and condensate recovered by green completed wells in a 3 year period. [Reference 42]

If green completion procedures can capture 61% to 98% of the gases formerly released during well completions, the process would be a more environmentally friendly alternative to flaring of the gases, since flaring destroys a valuable commodity and prevents its beneficial use. Green completions would also certainly be more beneficial than venting of the gases, since this can release very large quantities of methane and VOCs to the atmosphere. Another factor in favor of capturing instead of flaring is that flaring can produce carbon dioxide (a greenhouse gas), carbon monoxide, polycyclic aromatic hydrocarbons, and particulate matter (soot) emissions.

5.4 Fugitive Emissions from Production Wells, Gas Processing, and Transmission

Fugitive emissions from the production wells, gas processing plants, gas compressors, and transmission lines in the Barnett Shale can be minimized with aggressive efforts at leak detection and repair. Unlike controlling emissions from comparatively smaller numbers of engines or tanks (numbering in the hundreds or low thousands per county), fugitive emissions can originate from tens of thousands of valves, flanges, pump seals, and numerous other leak points. While no single valve or flange is likely to emit as much pollution as a condensate tank or engine exhaust stack, the cumulative mass of all these fugitives can be substantial. There are readily-available measures that can reduce fugitive emissions.

i. Enhanced Leak Detection and Repair Program

The federal government has established New Source Performance Standards for natural gas processing plants a.k.a. NSPS Subpart KKK. [Reference 43] These standards require regularly scheduled leak detection, and if needed, repair activities for items such as pumps, compressors, pressure-relief valves, open-ended lines, vapor recovery systems, and flares. The NSPS applies to plants constructed or modified after January 20, 1984. The procedures and standards in the processing plant NSPS are generally based on the standards developed for the synthetic organic manufacturing chemicals industry. [Reference 44]

Fugitive emissions from oil and gas wells, separators, tanks, and metering stations are not covered by the processing plant NSPS. Nonetheless, the leak detection and repair protocols established in the NSPS could certainly be used to identify fugitive emissions from these other items. Leak detection at processing plants covered by the NSPS is performed using handheld

organic vapor meters (OVMs), and inspections are required to be done on a specified schedule. These same procedures could be used at every point along the oil and gas system in the Barnett Shale to identify and reduce emissions of VOCs and methane. Doing so would reduce emissions, and by doing so, increase production and revenue to producers.

It is difficult to estimate the exact degree of emission reductions that are possible with fugitive emission reduction programs. The large and varied nature of fugitive emission points (valves, fittings, etc.) at production wells, processing plants, and transmission lines means that each oil and gas related facility in the Barnett Shale will have different options for reducing fugitive emissions. In general, leak detection and repair programs can help identify faulty units and greatly reduce their emissions.

ii. Eliminating Natural Gas-Actuated Pneumatic Devices

The State of Colorado is currently adopting and implementing VOC control strategies to reduce ambient levels of ozone in the Denver metropolitan area and to protect the numerous national parks and wilderness areas in the state. As part of this effort, the state investigated the air quality impacts of oil and gas development, including the impacts of the pneumatically-controlled valves and other devices that are found throughout gas production, processing, and transmission systems. The State of Colorado confirmed the basic conclusions arrived at earlier by EPA and GRI in 1995, that these pneumatic devices can be substantial sources of CH₄, VOC, and HAP emissions. [References 45, 46] Much of the following information on these devices and the strategies to control emissions is based on a review of the recent work in Colorado.

Valves and similar devices are used throughout the oil and gas production, processing, and transmission systems to regulate temperature, pressure, flow, and other process parameters. These devices can be operated mechanically, pneumatically, or electrically. Many of the devices used in the natural gas sector are pneumatically operated. Instrument air (i.e. compressed regular air) is used to power pneumatic devices at many gas processing facilities, but most of the pneumatic devices at production wells and along transmission systems are powered by natural gas. [Reference 46] Other uses of pneumatic devices are for shutoff valves, for small pumps, and with compressor engine starters.

As part of normal operation, most pneumatic devices release or “bleed” gas to the atmosphere. The release can be either continuously or intermittently, depending on the kind of device. In

2003 U.S. EPA estimated that emissions from the pneumatic devices found throughout the production, processing, and transmission systems were collectively one of the largest sources of methane emissions in the natural gas industry. Some U.S. natural gas producers have reduced natural gas emissions significantly by replacing or retrofitting "high-bleed" pneumatic devices. High-bleed pneumatic devices emit at least 6 standard cubic feet gas per hour. [Reference 46] Actual field experience is demonstrating that up to 80 percent of all high-bleed devices in natural gas systems can be replaced or retrofitted with low-bleed equipment.

The replacement of high-bleed pneumatic devices with low-bleed or no-bleed devices can reduce natural gas emissions to atmosphere by approximately 88 or 98 percent, respectively. [References 21, 47] Anadarko Petroleum Corporation estimated that VOC emissions from their pneumatic devices will be reduced by 464 tpy once 548 of their pneumatic controllers are retrofitted in Colorado. [Reference 46]

It may not be possible, however, to replace all high-bleed devices with low or no bleed alternatives. In the state of Colorado, it was estimated that perhaps up to 20 percent of high-bleed devices could not be retrofitted or replaced with low-bleed devices. Some of these included very large devices requiring fast and/or precise responses to process changes which could not yet be achieved with low-bleed devices.

But even for these devices that appear to require high-bleed operation, alternatives are available. Natural gas emissions from both high bleed and low bleed devices can be reduced by routing pneumatic discharge ports into a fuel gas supply line or into a closed loop controlled system. Another alternative is replacing the natural gas as the pneumatic pressure fluid with pressurized air. Instrument pressurized air systems are sometimes installed at facilities that have a high concentration of pneumatic devices, full-time operator presence, and are on a power grid. In an instrument pressurized air system, atmospheric air is compressed, stored in a volume tank, filtered, and dried. The advantage of a pressurized air system for operating pneumatic devices is that operation is the same whether they air or natural gas is used. Existing pneumatic gas supply piping, control instruments, and valve actuators can be reused when converting from natural gas to compressed air.

The U.S. EPA runs a voluntary program, EPA Natural Gas STAR, for companies adopting strategies to reduce their methane emissions. Experience from companies participating in the program indicates that strategies to reduce emissions from pneumatic devices are highly cost effective, and many even pay for themselves in a matter of months. [Reference 46] EPA reports

that one company replaced 70 high-bleed pneumatic devices with low-bleed devices and retrofitted 330 high-bleed devices, which resulted in an emission reduction of 1,405 thousand cubic meters per year. At \$105/m³, this resulted in a savings of \$148,800 per year. The cost, including materials and labor for the retrofit and replacement, was \$118,500, and therefore, the payback period was less than one year. Early replacement (replacing prior to projected end-of-service-life) of a high-bleed valve with a low-bleed valve is estimated to cost \$1,350. Based on \$3/m³ gas, the payback was estimated to take 21 months. For new installations or end of service life replacement, the incremental cost difference of high-bleed devices versus low-bleed devices was \$150 to \$250. Based on \$3 per Mcf gas, the payback was estimated to take 5 to 12 months. [Reference 46]

Overall, cost-effective strategies are available for reducing emissions and enhance gas collection from pneumatic devices in Barnett Shale area operations. These strategies include:

- Installing low- or no-bleed pneumatic devices at all new facilities and along all new transmission lines;
- Retrofitting or replacing existing high-bleed pneumatic devices with low- or no-bleed pneumatic devices;
- Ensuring that all natural gas actuated devices discharge into sales lines or closed loops, instead of venting to the atmosphere;
- Using pressurized instrument air as the pneumatic fluid instead of natural gas.

6.0 CONCLUSIONS

Oil and gas production in the Barnett Shale region of Texas has increased rapidly over the last 10 years. The great financial benefits and natural resource production that comes from the Barnett Shale brings with it a responsibility to minimize local, regional, and global air quality impacts. This report examined emissions of smog forming compounds, air toxic compounds, and greenhouse gases from oil and gas activity in the Barnett Shale area, and identified methods for reducing emissions.

Emissions of ozone and fine particle smog forming compounds (NO_x and VOC) will be approximately 191 tons per day on an annual average basis in 2009. During the summer, VOC emissions will increase, raising the NO_x + VOC total to 307 tpd, greater than the combined emissions from the major airports and on-road motor vehicles in the D-FW metropolitan area.

Emissions in 2009 of air toxic compounds from Barnett Shale activities will be approximately 6 tpd on an annual average, with peak summer emissions of 17 tpd.

Emissions of greenhouse gases like carbon dioxide and methane will be approximately 33,000 CO₂ equivalent tons per day. This is roughly comparable to the greenhouse gas emissions expected from two 750 MW coal-fired power plants.

Cost effective emission control methods are available with the potential to significantly reduce emissions from many of the sources in the Barnett Shale area, including

- the use of "green completions" to capture methane and VOC compounds during well completions,
- phasing in of electric motors as an alternative to internal-combustion engines to drive gas compressors,
- the control of VOC emissions from condensate tanks with vapor recovery units, and
- replacement of high-bleed pneumatic valves and fittings on the pipeline networks with no-bleed alternatives.

Large reductions in greenhouse gas emissions could be achieved through the use of green completion methods on all well completions, with the potential to eliminate almost 200 tpd of methane emissions while increasing revenue for producers by recovering saleable gas. In addition, the replacement of internal combustion engines with electric motors for compression

power could reduce smog-forming emissions in the D-FW metropolitan area by 65 tpd. Significant emission reductions could also be achieved with the use of vapor recovery units on oil and condensate tanks, which could eliminate large amounts of VOC emissions. Vapor recovery units on condensate tanks would pay for themselves in a matter of months by generating additional revenue to producers from the gas and condensate that would be captured instead of released to the atmosphere. Fugitive emissions of methane, VOC, and HAPs could be reduced with a program to replace natural gas actuated pneumatic valves with units actuated with compressed air. For those devices in locations where compressed air is impractical to implement, connection of the bleed vents of the devices to sales lines also could greatly reduce emissions.

There are significant opportunities available to improve local and regional air quality and reduce greenhouse gas emissions by applying readily available methods to oil and gas production activities in the Barnett Shale.” (EPA-HQ-OAR-2009-0923-1081-5)

Comment:

“We know that fugitive and vented emissions from oil and gas facilities are a significant source of greenhouse gas emissions in Texas. We must have accurate emissions data from these facilities to create policy that reduces greenhouse gases.” (EPA-HQ-OAR-2009-0923-1083-3)

Comment:

“I live in an area where gas companies are trying to take over and usurp the rights of non-mineral owners. We have a grade school where 4 cases of leukemia have been discovered in the past 3 years. there is enough data to declare it a cluster - --- so theykeep drilling. Please protect us our own state (Texas) will not. we are desparate here.

We are concerned for our water, our air, our property values, our health and the safety of our children.

There isn't enough information on the long term impact of fracking on the environment. it is especially concerning in urban areas.” (EPA-HQ-OAR-2009-0923-1086-1)

Comment:

“If these rules are good enough for the rest of the world then they should be implemented for American industry” (EPA-HQ-OAR-2009-0923-1088-1)

Comment:

“What happened in the Gulf of Mexico is tragic and unconscionable. It must not be allowed to happen again.” (EPA-HQ-OAR-2009-0923-1092-1)

Comment:

“As we have witnessed with the recent debacle unfolding in the Gulf of Mexico, the oil companies will go to any lengths to get what they want and to thumb their noses at the government and by implication to the people of the United States. We can't allow them to get away with this destruction any longer.” (EPA-HQ-OAR-2009-0923-1095-1)

Comment:

“My greatest concern is that no one planned for the inevitable disasters, whether caused by human or natural error, and had workable solutions in place. They must be able to prove that they can prevent this from spiraling out of control again the next time, and their surely will be a next time, as long as we are "dependent" on oil.” (EPA-HQ-OAR-2009-0923-1096-1)

Comment:

“Promulgation of strong, nation-wide GHG reporting rules for this industry will provide data essential for pushing both industry and vendors to utilize and develop the strongest emissions control measures possible.” (EPA-HQ-OAR-2009-0923-1097-1)

Comment:

“It seems vital to me that the oil and gas industries are held to strong oversight and regulation. They must not be allowed to continue to "self-regulate", so called, as they have been in the past, or to have the government agencies overseeing their work, their safeguards, and emissions to be so heavily influenced by the oil and gas industries. This has been a tragedy in our system for too many years and must be stopped.” (EPA-HQ-OAR-2009-0923-1101-1)

Comment:

“They also must be fined a significant amount so it hurts financially for them to take it seriously. In the end we would have this kind of disaster in the Gulf if you could NOT drill there . Stop the drilling of all offshore wells for good.” (EPA-HQ-OAR-2009-0923-1102-1)

Comment:

“I also expect BP to be held financially responsible for the entire cost of cleanup and reimbursements to all damaged parties injured by offshore drilling.” (EPA-HQ-OAR-2009-0923-1103-1)

Comment:

“THIS IS OUR WORLD! BP SHOULD BE ACCOUNTABLE TO THE UNITED NATIONS FOR DESTRUCTION TO THE OCEANS.” (EPA-HQ-OAR-2009-0923-1104-1)

Comment:

“I have been horrified to hear of the unfolding of the BP disaster. The close monitoring of offshore and onshore oil and gas industry has been lacking, and is absolutely necessary.” (EPA-HQ-OAR-2009-0923-1105-1)

Comment:

“I would also suggest that all communications from lobbyists to the EPA or to EPA employees be made public; either in a newsletter, or e-mailed to those interested people who subscribe. The public has a right to know what is going on behind the scenes; and lobbyists will think twice about their actions; if it is known that everything they say will be a matter of public record.” (EPA-HQ-OAR-2009-0923-1106-1)

Comment:

“Corporations should be accountable for what they do. They affect all of us by their decisions.” (EPA-HQ-OAR-2009-0923-1109-1)

Comment:

“These corporations want to be left alone to do whatever they want, but when disaster strikes they want the taxpayers to pay for fixing it. This is wrong in so many ways.” (EPA-HQ-OAR-2009-0923-1110-1)

Comment:

“I am writing to urge you to hold the gas industry accountable for its dangerous actions that threaten our ecosystems. The BP disaster just serves to remind us that there is no such thing as safe offshore drilling.” (EPA-HQ-OAR-2009-0923-1111-1)

Comment:

“People throughout the world are focused on the oil platform explosion and the resulting loss of life and devastating effect of the oil spill on the environment and way of life for the residents

living along the Gulf Coast. We need careful regulation and control of the oil and gas industries.” (EPA-HQ-OAR-2009-0923-1112-1)

Comment:

“We can not now or ever rely on the oil companies to serve the best interest of the world unless and until they are legally bound to comply with all laws pertaining to the protection of the environment, and or are henceforth prohibited from operating in the oil business.” (EPA-HQ-OAR-2009-0923-1113-1)

Comment:

“It's time the EPA did it's job to protect the environment and all citizens. Please DO NOT allow big oil to call the shots any longer and reap all the benefits.” (EPA-HQ-OAR-2009-0923-1114-1)

Comment:

“It is time to start looking at worst case scenarios when corporate and industry rulings are made. I recognize that jobs are on the line short term, but humans are adaptable-kicking and screaming, but adaptable. Some things are not especially adaptable in the short term. And the consequence is, there is no long term.

We can't start yesterday, but we can start today and you are the guy. Make the right decision and we will have your back.” (EPA-HQ-OAR-2009-0923-1115-1)

Comment:

“Hold them accountable ... owning the prople is the first step toward fixing it.” (EPA-HQ-OAR-2009-0923-1116-1)

Comment:

“It is time for Americans and all of humanity to realize that our technological expertise cannot save us from our own ignorance and inability. It is time for us to proceed responsibly, realizing that there is much we can accomplish when we work in harmony with nature and the resources of our home.” (EPA-HQ-OAR-2009-0923-1117-1)

Comment:

“Regulation of the industries is a must if we want to avoid destroying ecosystems that are related to our own sustainability as humans. How much has to be destroyed before we realize what must

be done? Please look at the long term picture since the industries seem to see only the short term profits. Thanks.” (EPA-HQ-OAR-2009-0923-1118-1)

Comment:

“STOP PIMPING FOR BIG COAL, GAS AND OIL!!!!!!!!!! These robbers are filthy rich and want to be richer!!!! They need to stop robbing US. They can well afford to make less money and be held responsible for their own greedy messes that trash our planet!!!!!!!!!! Tell the stock market to go to hell!!!” (EPA-HQ-OAR-2009-0923-1119-1)

Comment:

“It should not take a disaster like the current one to convince us to hold accountable all those industries affected our planetary health. If there is anything at all good from the situation caused by BP, let it be the establishment of strong standards & accountability.” (EPA-HQ-OAR-2009-0923-1120-1)

Comment:

“It is high time drill baby drill is confined to History books. Human beings have to remember that we are caretakers of this planet and not lords and masters. It is our responsibility to ensure this planet survives for future generations of all species. Off shore drilling without proper tools and technology to prevent a disaster like what happened in the gulf is no longer acceptable” (EPA-HQ-OAR-2009-0923-1121-1)

Comment:

“Why is our government still giving preferential treatment to this recklessly polluting, proven global warming Big energy business?! We MUST change our energy sources, and the government MUST be HONEST and forthcoming to the We THE PEOPLE, whom it supposedly represents, and our government MUST demand and enforce truth and honesty from megabusiness on all issues of critical significance to the citizens of America!” (EPA-HQ-OAR-2009-0923-1123-1)

Comment:

“It is time we took seriously the fact that we need to make a transition to sustainable, non-polluting energy, like wind and solar, both for ourselves and for the sake of the generations who will follow us. For inspiration, look into the faces of your children and grandchildren and imagine the world they will inherit.” (EPA-HQ-OAR-2009-0923-1125-1)

Comment:

“At the same time I very strongly support alternative energy resources,sun, wind, and water will serve us well when harnessed for energy without intruding on 'mother' earth.” (EPA-HQ-OAR-2009-0923-1126-1)

Comment:

“Whatever happened to accountability in America? Nobody seems to be held accountable for any wrong doing. And every time it's the American people who are left holding the bag. The Insurance industry, the financial industry, the automotive industry, the petroleum industry, are a few examples of crooks and incompetency where the American were left to pay the bill.

In school I was taught that the American government was different in that it was a government for the people by the people. The past decade has demonstrated that this is no longer true. America today reminds me more of a third world government than a great democracy.” (EPA-HQ-OAR-2009-0923-1127-1)

Comment:

“This disaster we are seeing in the Gulf is unprecedented. We have never had a spill so huge in our history. Our environment, the wildlife, the means of existence for our people in the region, will suffer for years from this. It is not the fault of any of those suffering. We need to make sure that this doesn't happen again. The oil and gas industry MUST be held accountable for what is going on there. The EPA stands for "Environmental PROTECTION Agency"--let's make sure you do your job, and protect us from things like this happening again!” (EPA-HQ-OAR-2009-0923-1128-1)

Comment:

“These companies have been damaging the environment for years and have been give to much free reign. They need to be held accountable!” (EPA-HQ-OAR-2009-0923-1131-1)

Comment:

“First it's the mining mishap with unnecessary deaths. Then the financial industry almost brings down our economy. Now BP is wrecklessly bringing devastation to the Gulf. It's clear from these recent events, not even touching past events, corporate America can't be trusted.” (EPA-HQ-OAR-2009-0923-1132-1)

Comment:

“Please, please, please - let's start doing what's right for the environment and future generations!!!” (EPA-HQ-OAR-2009-0923-1133-1)

Comment:

“Please help protect our country and our planet. Hold polluters accountable.” (EPA-HQ-OAR-2009-0923-1134-1)

Comment:

“If the pollution does not stop, we will not have a planet worth living on. As it is, mankind is killing off the very life forms that sustain us at a horrific rate. We must get away from fossil fuel energy, and go to sustainable energy forms such as solar, wind, etc. BP, and other fossil fuel companies, must be held fully accountable for any pollution, or environmental damage, that they cause.” (EPA-HQ-OAR-2009-0923-1137-1)

Comment:

“What's going to work best for ALL of us - in personal terms and in terms of business, education, the environment and peace? This question must be at the heart of government and personal decision making if we want to survive long term. We must understand we are both one AND separate, and that; we are not only the product of creation, we are creation itself.

When the influence of money, power and privilege becomes so corrupting it threatens our very existence, it is time to change. We must follow our hearts as well as our heads in matters of common interest. Nature can survive without us but we cannot survive without nature. We need to do what needs to be done and not equivocate! How we define ourselves, and the world around us, forms our intent, which in turn, forms our reality.” (EPA-HQ-OAR-2009-0923-1138-1)

Comment:

“Let's get real. There must be solutions. Somebody's lying to someone. Fix the problem and then figure whose fault it is.” (EPA-HQ-OAR-2009-0923-1139-1)

Comment:

“The horrible BP disaster in the Gulf shows, without a shadow of a doubt, that the oil and gas industry HAS TO be held accountable for how they affect our environment, and thus, all of us. Please make sure that the system uses direct pollution measurements, detailed and accurate, and that the industry's emissions are included in the reporting system as soon as possible.

Technology and oil profits are worthless when countless living things, humans included, are at stake.” (EPA-HQ-OAR-2009-0923-1140-1)

Comment:

“Regulations were in place originally for valid purposes. Skirting them by political action is and was wrong. Do not allow exceptions to the rules.” (EPA-HQ-OAR-2009-0923-1141-1)

Comment:

“It really makes no sense to hide the facts - without this information being made available, there is no incentive for these industries to do anything to avoid pollution.” (EPA-HQ-OAR-2009-0923-1142-1)

Comment:

“We need enforcement of existing laws to clean up drilling and producing well sites. Please hire inspectors to visit existing wells, report on compliance with mitigation measures, make sure abandoned wells are plugged and the well sites are revegetated and restored. We need to be able to levy significant fines for non compliance, which would actually cost more than doing the right thing and restoring the well sites.” (EPA-HQ-OAR-2009-0923-1145-1)

Comment:

“This is not the first time that a major oil spill has contaminated U.S. and international waters. Unfortunately, it won't be the last. The oil and gas industry corporations must be made to pay for all cleanup and damages, including losses to businesses such as hospitality and tourism, which indirectly depend on seafood and shellfish production.” (EPA-HQ-OAR-2009-0923-1147-1)

Comment:

“Oil and gas companies can no longer be allowed to externalize costs, which fall on U.S. citizens and affect delicate habitats for wildlife.” (EPA-HQ-OAR-2009-0923-1147-2)

Comment:

“Oil companies should pay every penny towards clean up and compensation for people, wildlife and industries harmed by any of their mistakes be they catastrophic or even mildly polluting.” (EPA-HQ-OAR-2009-0923-1148-1)

Comment:

“The horrifying and probably permanent BP disaster that has been inflicted on the Gulf has once again demonstrated that the oil and gas industry must be held accountable for their actions. Simply, corporations must be held to financial responsibility to make up for the societal and environmental costs of what they do to make profits.” (EPA-HQ-OAR-2009-0923-1150-1)

Comment:

“API and its members fully appreciate the need for a consistent approach to GHG emissions calculations and reporting, and support the need for a single, harmonized, national GHG emissions reporting program. Such a program should ensure data uniformity and fungibility, and strive to avoid a burdensome patchwork of conflicting definitions and reporting rules.” (EPA-HQ-OAR-2009-0923-1151-1)

Comment:

“Oil and gas industry should be accountable for pollution.. Put back the mandatory greenhouse-gas-reporting rule, which tracks massive global warming pollution emissions. Also, this year, EPA proposes to include offshore and onshore oil-and-gas industry in the system. I strongly support that decision.” (EPA-HQ-OAR-2009-0923-1153-1)

Comment:

“To paraphrase, time for CHANGE! Well, I'm waiting for one, as now it seems to be "business as usual". I am waiting for truly creative solutions for changing oil consumption and imploring the profiteers to find an ethical solution and not look for a "more profits" solution.” (EPA-HQ-OAR-2009-0923-1157-1)

Comment:

“The gas and oil industry must be held accountable. There has been great corruption in the practice of allowing industry lobbyists to influence our supposed protection agencies. This can no longer be permitted.” (EPA-HQ-OAR-2009-0923-1158-1)

Comment:

“The Big Oil has had its way long enough and has caused so much pollution that it will take many years to clean up the environment. Please stop their GREED and think of mankind and the future generations.” (EPA-HQ-OAR-2009-0923-1160-1)

Comment:

“Years of delay in holding oil producers accountable have made it possible for this disaster to occur. Let the Obama Administration take advantage of the public outcry for this obvious calamity and create and enact as rigorous guidelines as are available. The health of the planet demands this.” (EPA-HQ-OAR-2009-0923-1162-1)

Comment:

“PLEASE act as soon as possible. The future of the world and the quality of life for the world's children and grandchildren are at stake!” (EPA-HQ-OAR-2009-0923-1163-1)

Comment:

“Our quasi-capitalism would suggest that we understand the full cost for every product we consume. How much is each gallon of gasoline when we add the cost of this eco-disaster? This, on top of the cost of our invading a sovereign nation that possessed the oil we demanded. It makes the cost of clean and renewable energy sources a true value.” (EPA-HQ-OAR-2009-0923-1165-1)

Comment:

“Devon also supports the comments submitted by other associations that we belong to, namely the American Petroleum Institute (API), the American Exploration & Production Council (AXPC), and the Gas Processors Association (GPA).” (EPA-HQ-OAR-2009-0923-1174-3)

Comment:

“is the least EPA can do to make the oil industry accountable. Please take strong action!” (EPA-HQ-OAR-2009-0923-1177-1)

Comment:

“It is time to include offshore oil and gas along with onshore in our measurements of industry emissions. This industry can no longer be granted any loopholes like the one that enabled it to escape from mandatory greenhouse gas reporting.” (EPA-HQ-OAR-2009-0923-1182-1)

Comment:

“Watching the catastrophe happening in the gulf, it is clear that the environment, wildlife and humans will be affected for years. This disaster if nothing else should teach us that the

responsible oil and gas industry has to be supervised even more closely and certainly held accountable.” (EPA-HQ-OAR-2009-0923-1184-1)

Comment:

“Already, they don't pay for externalities like our poor health as a result of their toxic products, disease from their various spills etc. It's time for them to cover ALL their costs to society, finally.” (EPA-HQ-OAR-2009-0923-1185-1)

Comment:

“As a nation, we have not done enough rigorous thinking about fossil fuel energy, CO2 emissions, the accumulation of atmospheric CO2, rising temperatures, and damaging climate change.

What we sense is that rising temperatures will be proportionate to accumulating CO2. What we fail to realize is that climate change behaves very differently from temperature change. A small change in temperature can trigger a dangerous qualitative shift in how climate behaves. Climates once friendly to agriculture can turn into climates where agriculture is nearly impossible. Temperatures once low enough to preserve the ice sheets on Greenland and West Antarctica can rise to a point where those ice sheets will no longer survive. Because we haven't thought this through, we don't realize how much extra climate danger we create by being careless about total CO2 emissions.

I urge you to include offshore oil in the CO2 emission reporting requirements that EPA supervises.

And I urge you to speak out for the necessity to create a post-fossil fuel energy economy in the U.S. at the soonest feasible date. Dangerous climate change won't come to an end till temperature change ends; temperature change won't end till emissions stop; emissions won't stop till we have a post-fossil fuel, clean energy economy.” (EPA-HQ-OAR-2009-0923-1187-1)

Comment:

“These ruthless criminals have been at the helm for far too long. The entire 20th Century was poisoned by them and their filthy dealings in the name of their insatiable lust for more money and more power. They have shown no remorse for their incompetence and its results. We send arsonists to prison for destroying buildings. These people have destroyed an entire ecosystem and each and every one of them should be held accountable, criminally and civilly. They should be prosecuted to the full extent of the law, just as any other American citizen would be forced to suffer for far lessor crimes.” (EPA-HQ-OAR-2009-0923-1188-1)

Comment:

“It's time that these industries be RESPONSIBLE for all of their activities that affect the environment, as this has sooo many repercussions that are, in the moment and in the end result soooo much more important than the money that runs them!” (EPA-HQ-OAR-2009-0923-1189-1)

Comment:

“If there is to be any restraint on the reckless drive of the oil industry to maximize profits, it must come from the Federal government. The oil and gas developers must be held accountable and responsible for their failures to protect and preserve the environment in the process of their work. The EPA must establish and enforce regulations to ensure that this work is done safely, and apply punitive sanctions when it is not.

The best alternative is to prohibit offshore drilling and promote alternative energy sources.” (EPA-HQ-OAR-2009-0923-1192-1)

Comment:

“Please tighten the regulations on ALL energy producing companies. Once our environment is destroyed, it will take centuries to return it to its original conditions. Lobbyists do not have the country's best interests at heart. All they care about is profit.” (EPA-HQ-OAR-2009-0923-1207-1)

Comment:

“The ongoing disaster in the Gulf of Mexico has made one thing perfectly clear.....we MUST hold corporations (in this case BP) responsible for the damage they do while on their unending quests for yet bigger profits. It is really unfortunate that we have not been doing a better job of holding them responsible.” (EPA-HQ-OAR-2009-0923-1211-1)

Comment:

“No more special treatment of the gas and oil industry. They make Billions of dollars a year-- it is not the job of the EPA to save the gas and oil industry money. It isn't the job of the EPA to be friends with the industry. The EPA should make the gas and oil industry live up to very stringent standards to insure that we protect the environment from further destruction.” (EPA-HQ-OAR-2009-0923-1216-1)

Comment:

“This is clearly a major turning point in the relation between government and oil companies, and, beyond that, our civilization's relation to energy fuel altogether. This administration and its departments and agencies, the EPA perhaps first and foremost, must heed this drilling disaster and, without delay, begin to assume fuller responsibilities for ensuring safety and compliance with pollution measurement and regulation. Please begin with this offshore/onshore emissions reporting rule.” (EPA-HQ-OAR-2009-0923-1217-1)

Comment:

“Corporations, businesses, industries and especially BP must submit to stringent government control because so many of them prove, time-after-time, that they simply do not do a single thing that takes away from their unethical, greedy bottom-line thinking. The fear and dread of "big government" that so many are deluded with must not be accommodated; government enforcement is the ONLY way to help keep America and the world safe from corporate greed.” (EPA-HQ-OAR-2009-0923-1218-1)

Comment:

“how about stopping offshore drilling all together??? Instead put the funding and research and action into getting OFF OIL” (EPA-HQ-OAR-2009-0923-1219-1)

Comment:

“Every little step helps, and moving to a "clean energy" future will be much easier if we no longer exempt the "dirtier" energy sources from complying with clean air and other necessary regulations.” (EPA-HQ-OAR-2009-0923-1220-1)

Comment:

“I see public policy as the only way the oil and gas as the only way that the oil and gas industry can be made accountable. I strongly support the EPA's decision to include off shore and onshore oil and gas industry in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-1224-1)

Comment:

“No one should be exempted on something as important as the health of the earth. Make the oil and gas industries as accountable as everyone else.” (EPA-HQ-OAR-2009-0923-1228-1)

Comment:

“And I would also propose that Big Coal be just as accountable. No fossil fuel producer can be left out of these requirements.” (EPA-HQ-OAR-2009-0923-1233-1)

Comment:

“This tragedy will have environmental repercussions on a global scale for decades to come. This incident, if nothing else, is clear evidence of humanity's dire need to abandon fossil fuels for cleaner alternatives. Hold the gas and oil industries accountable for their crimes against the planet.” (EPA-HQ-OAR-2009-0923-1235-1)

Comment:

“If anything has shown what poor self-administrators the oil industry is the last month is a prime example. They need to be held totally accountable for all the problems that has happened to our coastline, marshes, people who live and make their living in the area. They should have had better contingency plans. In the future, no contingency plans, no drilling.” (EPA-HQ-OAR-2009-0923-1236-1)

Comment:

“This country has become the United Corporations of America. Do something to crack down on this industry and make them follow the rules and regulations that have been put into effect and those that hopefully will be forthcoming.” (EPA-HQ-OAR-2009-0923-1239-1)

Comment:

“We must begin holding corporations accountable for their actions, unless we want to relive these horrors again and again. Without consequences that are very stiff they have no reason to adhere to regulations.” (EPA-HQ-OAR-2009-0923-1240-1)

Comment:

“It is time we hold corporateAmerica accountable for the destruction they are doing to the environment. Do the right thing and change the rules to include the oil and gas industries in the reporting process.” (EPA-HQ-OAR-2009-0923-1241-1)

Comment:

“Regulations must be in place for this to never happen again and further stop the oil drilling in our waters.” (EPA-HQ-OAR-2009-0923-1247-1)

Comment:

“It is time to change how we do things. We are killing our planet and this just proves it! Why can't we all just go solar. We do it and it doesn't take away anything from our lives. In fact it makes it better and cleaner and saves us money which we can then spend in other areas and finally stimulate the economy. We need your help to do so.” (EPA-HQ-OAR-2009-0923-1250-1)

Comment:

“If we are going to hold Big Oil accountable for its global warming pollution, we need to know where it is coming from and in what quantities.” (EPA-HQ-OAR-2009-0923-1255-1)

Comment:

“BP is also planning to try to open mining operations in and near the Great Lakes in Upper Michigan and near Lake Superior. They should also be required to accurately report the pollution potential from those mines” (EPA-HQ-OAR-2009-0923-1256-1)

Comment:

“The years of DE-REGULATION have taken down our financial systems, and now our sacred oceans.

The immorality of corporations looking only at the bottom line, must stop.” (EPA-HQ-OAR-2009-0923-1258-1)

Comment:

“I work in the energy industry and just like some coal companies wereckognize the need for controls please discipline us for evryone'shigheest good!!” (EPA-HQ-OAR-2009-0923-1264-1)

Comment:

“The Australian Petroleum Production and Exploration Association (APPEA)has a Code of Environmental Practice that the US oil explorationindustry would do well to copy. It is a real eye opener to view anenvironmentally cognizant and ecologically responsible code of ethics.

Since 2001, there have been 858 fires and explosions in the Gulf,according to the federal Minerals Management Service. On the otherhand, During 40 years of exploration and production in Australianwaters there have been only six blow outs in over 2,400 wells drilled.Four of these were in the late 1960s and the last one occurred in 1984.” (EPA-HQ-OAR-2009-0923-1266-1)

Comment:

“And, here's a thought. How about requiring that any new drilling demonstrate the ability to handle any problems that occur before we allow them near our waters. BP is using the same inane terminology as was used in 1979 during the terrible disaster that occurred 31 years ago! Same Containment Booms (that don't work), same "Containment Dome" that didn't work; then the "top hat" has called a "sombbrero," and there was also the equivalent of the "junk shot!" Thirty-one years of technology to learn how to drill in deep water; 0 progress when it comes to actually fixing a problem! Why are we allowing these people in our waters? Why are we not using all our energy and intelligence to put a stop to fossil fuels?! We must create a green future that omits pollution.” (EPA-HQ-OAR-2009-0923-1270-1)

Comment:

“DO THE RIGHT THING! Hold them accountable. It will cost everyone more, but I'm happy to pay extra at the pump, to preserve the environment!” (EPA-HQ-OAR-2009-0923-1273-1)

Comment:

“Please regulate our offshore drilling! This is a disaster of epic proportions. Energy sources are important, drive the change by holding these corporations responsible for their behavior. If one man were to do this, he would be arrested and imprisoned.” (EPA-HQ-OAR-2009-0923-1280-1)

Comment:

“This spill has to be stopped. Oversight must be improved to prevent this from happening again! Obscene profits should never outstrip concerns and efforts towards safety and environmental protection.” (EPA-HQ-OAR-2009-0923-1293-1)

Comment:

“Global Warming is everyone's problem, and we need to honestly measure and monitor the release of all CO₂ and other greenhouse gases in order to assess whether or not particular steps towards a solution are working.

The issue goes beyond any particular person, country or company, even a behemoth like BP. All sources of greenhouse gases must be tracked, specifically including the petroleum industry, in all of its phases (exploration, development, production, refining, transportation etc.) anywhere it operates.

Please make a decision to insist that the oil and gas industry be mandated to report all greenhouse gas emissions.” (EPA-HQ-OAR-2009-0923-1296-1)

Comment:

“Our prospects for a sustained environment and economy depend on our quitting our addiction to oil and coal and switching our economy to clean alternatives -- solar, wind, wave, and geothermal.” (EPA-HQ-OAR-2009-0923-1308-1)

Comment:

“Now is the time to support alternate means of energy and push hard for this to happen now.” (EPA-HQ-OAR-2009-0923-1312-1)

Comment:

“It is about time corporations be regulated to protect the interests, environment and safety of all American citizens. For too long corporations have claimed they can be self regulating. Not so when the main purpose of corporations is to make profits at the cost of 11 lives in the Gulf and 29 lives in a coal mine. Not to mention the environmental damage and loss of other industries. The time to act is NOW!” (EPA-HQ-OAR-2009-0923-1315-1)

Comment:

“It is obvious that big business can't be trusted to do the right things. They are looking to make as much money as possible and damage everything else. Wall Street, health insurance, auto, and oil have shown us all of this in recent times. There is need for regulation that doesn't provide loopholes and protects the citizens of this country, not big business.” (EPA-HQ-OAR-2009-0923-1320-1)

Comment:

“Reporting on how the industry is funding alternatives to fossil fuel should be required. Profits must be reinvested in alternative energy sources. This is the only way to create a win-win scenario.” (EPA-HQ-OAR-2009-0923-1322-1)

Comment:

“Please ensure that the oil and gas industry is required to participate in the mandatory greenhouse gas reporting rule to track their pollution emissions, and hold them accountable not only when

things like the BP disaster happen, but also before these problems arise.” (EPA-HQ-OAR-2009-0923-1324-1)

Comment:

“I think that we should follow Canada when it comes to deep well drilling, where they require 2 relief wells to be drilled when drilling in deep water. I think that the oil and gas companies should be accountable for all environmental damage both now and in the future. What are the air and water quality going to look like after the leak is stopped months, or even years from now? What are the long term effects from the chemicals being used to disperse the oil? Will we see increases in cancer or other diseases, what about the wildlife? Will our seafood be safe? Will our water be safe to drink?” (EPA-HQ-OAR-2009-0923-1348-1)

Comment:

“Further, do not permit any drilling operation that does not post a multi-billion dollar bond to be cover the initial costs of the damage, but in no case constituting a "cap" or other limit on civil or criminal liability.” (EPA-HQ-OAR-2009-0923-1350-1)

Comment:

“In the USA, I, as a citizen, want to know what pollution is caused by everyone, especially big businesses that prioritize profit over health and the environment. A law that allows them to hide this from the public is disturbing.” (EPA-HQ-OAR-2009-0923-1355-1)

Comment:

“The oil spill in the Gulf is a disaster. How can another such be prevented in the future? A start would be to implement the EPA's proposal. That is, to make mandatory that the off and on shore oil industry must report their pollution emissions using direct, rigorous and detailed measurements soon as possible.” (EPA-HQ-OAR-2009-0923-1361-1)

Comment:

“Neither the oil and gas industry, the power industry, the auto industry, the metal-refining industry, nor any other industry, including the US Military and its sorry lot of contractors, should be allowed to hide their respective contributions to the accumulating pollution.” (EPA-HQ-OAR-2009-0923-1366-1)

Comment:

“Operating a deep sea drill rig with no known way of stopping and/or curing the consequences of an oil spill accident is in effect saying you will NEVER EVER have a pollution accident. This is unrealistic and obviously catastrophic to the environment and to people.

Corporations must prove that their operations can be done safely. They must spend the time and money to develop realistic demonstrable techniques that prevent, and if necessary cure the consequences of their accidents, OR THEY MUST NOT BE GIVEN PERMITS TO DRILL. The most immediate measure they should take is to be required to drill relief wells on existing wells to as to have a solution ready in case of an accidental blow out. This is required when drilling in Canadian waters. Penalties for spills and for operational negligence must be sufficient to provide the incentive to first, not short cut safety or good operating procedures, and second to invest in research to prevent spills from happening. Corporations must be told and held accountable for ALL spill damage.

There must be legislation that holds first, the corporation liable regardless of legal maneuvers such as bankruptcy etc., and second, the management must be held personally accountable as the last recourse.

Finally there must be legislation that disqualifies a corporation from drilling in US controlled waters if there is a track record of spills regardless of fault.” (EPA-HQ-OAR-2009-0923-1369-1

Comment:

“It is, at long last, time to get an honest assessment of the real cost of oil and gas production. We cannot afford to ignore it any longer.” (EPA-HQ-OAR-2009-0923-1370-1)

Comment:

“Also, I think that the EPA should take more control over the dispersants used in the Gulf. More toxic dispersants were used instead of other, available, less toxic dispersants. These chemicals may have a much longer term effect on ocean life than the oil itself.” (EPA-HQ-OAR-2009-0923-1373-1)

Comment:

“IF WE'VE LEARNED ANYTHING, IT'S THAT FOSSIL FUELS ARE NOT THE ANSWER. SOLAR AND WIND ENERGY ARE.” (EPA-HQ-OAR-2009-0923-1375-1)

Comment:

“The BP oil spill is more evidence that the oil and gas industry cannot be trusted to be environmentally responsible or even to follow laws and regulations. And the results have been disastrous, both to our environment and to our economy.

It is therefore imperative that the EPA include both the offshore and the onshore oil and gas industry in its system of mandatory reporting on greenhouse gas emissions (and any other regulations the EPA determines necessary to achieve its goals). Please ensure that clear and firm rules are set so that the oil and gas industry cannot circumvent providing the measurement information needed to help the EPA set measures to curb greenhouse gases.” (EPA-HQ-OAR-2009-0923-1384-1)

Comment:

“What is it with most people in Government! Can they not understand that OIL IS NOT THE ANSWER! Clean coal is an oxymoron, nuclear power is a death sentence for future generations and oil is on its last legs. They need to fund solar, wind and geothermal energy. All of which are renewable, clean and do not destroy the only planet man has that he can live on. All of which bring new jobs, technology and money to the cities, counties, states and country. Instead of a Government who is willing to sell off my heritage for a shortsighted goal when will there be a Government who will see this nation free of its oil dependency. It is time that all Government voted the monies, time, energy and resources of this nation on Alternative Energy Solutions, which the majority of the people in this Country agree, is something, which is absolutely needed” (EPA-HQ-OAR-2009-0923-1385-1)

Comment:

“It is time to hold BP, as well as other oil and gas industries accountable. I support closing the loopholes that the oil and gas industries have utilized. We must have mandatory greenhouse gas reporting which includes the onshore & offshore gas and oil industry.” (EPA-HQ-OAR-2009-0923-1393-1)

Comment:

“We must move quickly to 100% renewable green energy system or we will cause our own extinction as well as all other lifeforms.” (EPA-HQ-OAR-2009-0923-1395-1)

Comment:

“We in the USA use more energy per capita than anywhere in the world. Now that we know the need to clean up and repair let us go all the way and lower our use of fuels that can have

environmental problems and start using energy systems that are safer and have less pollution. I think the people are ready so let's get at it!" (EPA-HQ-OAR-2009-0923-1399-1)

Comment:

"We must STOP using fossil fuels ASAP, for numerous well-known and well-documented reasons: from its extraction to its destruction of the greenhouse gas balance, it is and has been a terrible idea for decades. Your agency should ask the President to turn all national resources toward increased conservation and rapid development of wind, solar, and geothermal energy sources by the end of this decade, starving this fossil fuel industry and declaring it dead. "Accidents" such as the Gulf oil "spill" are not only not "unforeseeable (as claimed recently by BP officials); the scenario has been foreseen for more than three decades by people in the environmental professions." (EPA-HQ-OAR-2009-0923-1403-1)

Comment:

"I am also gravely disturbed by the chemicals and detritus (ie golfballs, shredded tires etc.) used to try to stop the flow. What is in this MUD used to pump into the gusher? Why is no one talking about the toxicity of these so called clean-up efforts? The EPA needs to be on the front end of clean-up- monitoring what will be used in the event of a disaster for "clean-up" as well as on the pollution emissions at the end result." (EPA-HQ-OAR-2009-0923-1409-1)

Comment:

"I want to express my support for EPA's proposal to include off and onshore oil facilities in the mandatory reporting rule for greenhouse gases." (EPA-HQ-OAR-2009-0923-1411-1)

Comment:

"We support the EPA to act immediately and decisively to prevent the oil and gas industry from causing further pollution of our air, land, and water." (EPA-HQ-OAR-2009-0923-1412-1)

Comment:

"Now is the time to rally the troops and demand quick action for alternative methods of energy to be developed for all Americans." (EPA-HQ-OAR-2009-0923-1415-1)

Comment:

"NO MORE EXEMPTIONS. For anybody damn it. What does EPA stand for? Start doing your damn jobs, start protecting the environment!" (EPA-HQ-OAR-2009-0923-1418-1)

Comment:

“The time is overhue to fight climate change and stop pandering to thebig oil companies and other risky polluters” (EPA-HQ-OAR-2009-0923-1428-1)

Comment:

“The offshore gas and oil should be accountable in the greenhouse emission count. The interest of the citizens should be primary to thetremendous money clout of the oil industry.” (EPA-HQ-OAR-2009-0923-1432-1)

Comment:

“I think it should be no-brainer at this point that these industriesNEED to be carefully regulated, with an eye to preserving the foodchain which begins in the ocean for future generations. This disaster is just beginning to unfold, the real, long-term consequences as yetunknown.” (EPA-HQ-OAR-2009-0923-1433-1)

Comment:

“Further, it seems clear that BP consistently ignored warning signsabout the safety of its' oil rig and operation here. In the past fewmonths, there have been complaints about the safety of its operatingprocedures and BP, in its desire to complete the job, chose speed ofjob completion over safety of its' workers and any environmentalconcerns.BP has to to be fully accountable for economic andenvironmental losses in that region and financially compensate for allof them.” (EPA-HQ-OAR-2009-0923-1434-1)

Comment:

“It isn't the people or the cars that cause so much pollution. It's the large companies that lobby for special rules and favors, and get awaywith massive pollution because of their money and bribes. Please close the loopholes that permit this!” (EPA-HQ-OAR-2009-0923-1435-1)

Comment:

“The public has the right to know what is going into our atmosphere, bywhom and how much. How else can we work to keep our environment ingood shape for us and future generations?” (EPA-HQ-OAR-2009-0923-1440-1)

Comment:

“Yes BP cut corners, and caused the most devastating spill in U.S. History, if not the world's. Yes, they should be punished.. But let's look at it another way, it's time to employ our renewable and clean energy alternatives, plenty of them are out there and by cutting our subsidies to inept and dangerous companies like BP etc. We can bring about a new age of clean energy to the States and the World, now is the time.” (EPA-HQ-OAR-2009-0923-1443-1)

Comment:

“I strongly support your proposal to include the oil and gas industry under the mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-1448-1)

Comment:

“Please, it's a no-brainer--you can't track something without all the data. Do we constantly have to beg you guys to do the right thing--I'm so sick of it.” (EPA-HQ-OAR-2009-0923-1449-1)

Comment:

“I want accountability! People died due to BP's poor maintenance procedures, and the resulting oil slick will cost far more than the existing \$10 m cap on liabilities. What about the federal officials we read about being bribed and schmoozed by their charges? People need to be in jail for this bad behavior.” (EPA-HQ-OAR-2009-0923-1452-1)

Comment:

“Hold all corporations accountable! Put a stop to the cozy relationship between regulators and perpetrators of "for-profit" entities!” (EPA-HQ-OAR-2009-0923-1453-1)

Comment:

“It is time for profound change! The oil and gas industry has escaped the need to be accountable, transparent and credible. We are experiencing "the urgency of now" in implementing needed controls on these giants who wield incredible power and heavily impact the world we live in in many ways. The BP disaster highlights the dangers and weaknesses within the oil and gas industry that have for too long been accepted and gone unchecked. Please pursue this unique window of opportunity to shed light on oil and gas industry operations, hold them accountable and prevent future tragedy.” (EPA-HQ-OAR-2009-0923-1461-1)

Comment:

“Also it is time to restructure their big tax exemptions and write offs so they pay little or no taxes to the America.” (EPA-HQ-OAR-2009-0923-1474-1)

Comment:

“It is time that we move away from our dependence on fossil fuels. If the oil and gas industries were smart, they would become energy companies and develop as many alternative energy options as possible (wind, solar, geothermal, and hydro).” (EPA-HQ-OAR-2009-0923-1476-1)

Comment:

“If this disaster doesn't prove the need for stepped up alternative energy solutions, what does? The devastation of lives, both marine and human, will last decades to come. What's it going to take for EPA to take a stand? to move forward that this type of catastrophe never happens again? How long does it take to figure out that people cannot eat money?” (EPA-HQ-OAR-2009-0923-1479-1)

Comment:

“We need tougher laws passed so safety issues are addressed so that we do not have another spill like the Gulf. The effects of this spill will be felt for years. The eco system of the Gulf coast might not survive the current crisis.” (EPA-HQ-OAR-2009-0923-1480-1)

Comment:

“No industry should be exempt from rules and regulations that apply to other industries, no matter how much money they spend on lobbying, advertising, and campaign contributions.” (EPA-HQ-OAR-2009-0923-1482-1)

Comment:

“We expect EPA and other agencies to do their job and protect us and the environment. I support stronger measures to do just that. Now is the oil disaster next will be the Uranium-Nuclear disaster. Can we afford the risks these companies are taking with our lives?” (EPA-HQ-OAR-2009-0923-1484-1)

Comment:

“It is time to include all costs of doing business. we must include the damage to the environment the indigenous people and the health of all people !” (EPA-HQ-OAR-2009-0923-1487-1)

Comment:

“It is outrageous that a privileged sector of international business should be able to bypass the regulations that might well have prevented the nightmare we now face off our southern shores. If you are EVER going to put in place meaningful regulations to rein in the oil industry, NOW is the time! No more exceptions, exemptions, excuses...just DO it for the sake of our nation and our hemispheric ecosystem.” (EPA-HQ-OAR-2009-0923-1488-1)

Comment:

“When Regulators in Washington don't do their jobs, this allows oil and gas companies to ignore laws that should protect our environment, health and our eco systems. The BP disaster should never have happened. I support the EPA in their proposals to include in the system, offshore and onshore drilling, and keep this from happening again.” (EPA-HQ-OAR-2009-0923-1489-1)

Comment:

“The Florida Keys is near-death with this recent Leak (NOT A SPILL) and our livelihoods at stake. We may be at the end of the road but please do not overlook our voices!” (EPA-HQ-OAR-2009-0923-1490-1)

Comment:

“If we are ever to solve our energy crises, the most important element has to be a clear and objective evaluation of the costs and benefits of those methods we currently use to generate energy” (EPA-HQ-OAR-2009-0923-1491-1)

Comment:

“We've come a long way in the last 150 years of industrialization when we only progressed without consideration of what it did to our environment. Well now we know what it can do and we have to take responsibility for it and find new and more environmentally friendly ways to take us into the future. Even though most of us won't be here our children, grandchildren and great-grandchildren will” (EPA-HQ-OAR-2009-0923-1492-1)

Comment:

“WE HAVE TO STOP DESTROYING OUR PLANET!! IT'S THAT CLEAR” (EPA-HQ-OAR-2009-0923-1493-1)

Comment:

“If Big Oil is not held accountable now, when? If they don't pay for everything that has gone wrong in the Gulf, why not? The time has come for the "spoiled child" to be disciplined severely for what he has done and, obviously, is still doing; namely, the lying, cheating, and stealing from the American public for so long that he thinks he's just too big to fail! WRONG!!! Clip his wings, strip him of all privileges, and give him the bill to be PAID IN FULL to all those innocent people and creatures that have lost their livelihoods and lives respectively.

Stop pussyfooting around BIG OIL and give them the rules and regulations they so richly deserve. And while you're at it, ban them from ever going near the ANWAR, Bristol Bay, the coasts of California, Virginia, North or South Carolina, Georgia, Florida, or anywhere in or near water since it's more than apparent that they have no clue what to do when there is a Spill, baby, spill!” (EPA-HQ-OAR-2009-0923-1494-1)

Comment:

“We are all in part responsible for this catastrophe because of our continued addiction to petroleum products, but if we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1495-1)

Comment:

“It is time to make some real changes to protect our environment. This oil spill is the trigger to help motivate us to finally make that happen. These spills are nothing new and the failed tactics BP is using to try and stop the leak have also been done in the past. This is unacceptable and BP should be held accountable as well as law-maker and the negligent regulators. Stop off-shore drilling and put into place wind, solar and other alternative fuel infrastructures. Use Denmark as a model that we in the U.S can use and even improve upon. Do not let this opportunity slip by. We have failed with effective healthcare, financial regulation, education and our toxic food supply and to fail again will sink us deeper into a pit we can't get out of. Enough is enough, I am tired and weak and need you to lift me and our society up.” (EPA-HQ-OAR-2009-0923-1496-1)

Comment:

“As a professional biologist and ecologist, I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible” (EPA-HQ-OAR-2009-0923-1497-1)

Comment:

“This whole charade is unacceptable.

Our wild life, our livelihoods, our future and the future for all of our children must be protected.

We must never let atrocities like this happen again” (EPA-HQ-OAR-2009-0923-1498-1)

Comment:

“Stop this situation of the corporations running the government or there are groups now forming that will” (EPA-HQ-OAR-2009-0923-1499-1)

Comment:

“As you probably know, the ecological crisis presents us with the biggest threat to life as we know it on Earth. Please keep this perspective with it's moral implications as the foundation for all of the EPA's actions. We depend on you to lead the charge.

Thanks!” (EPA-HQ-OAR-2009-0923-1500-1)

Comment:

“The energy industry is making enough money so that they can afford to start cleaning up their messes before they make them” (EPA-HQ-OAR-2009-0923-1501-1)

Comment:

“We need to change our focus from helping the fossil fuel industries from getting away with murder to protect life and the environment” (EPA-HQ-OAR-2009-0923-1502-1)

Comment:

“Let us work to insure the protection of our environment above all profit making.” (EPA-HQ-OAR-2009-0923-1503-1)

Comment:

“Don't sell us out for greed to these powerful men who rule our country, who have our children at war with oil rich nations for their greed. Set standards for the industry, the government and the people to become independent from oil which is ruining our earth and making it inhabitable for the future” (EPA-HQ-OAR-2009-0923-1504-1)

Comment:

“Please take care of this fragile planet, our only home, especially for our children” (EPA-HQ-OAR-2009-0923-1505-1)

Comment:

“STOP LOBBYISTS FROM INFLUENCING LAW - laws and rules are made to protect our environment and there should be no way to get around them” (EPA-HQ-OAR-2009-0923-1506-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable and not regulated by former/affiliated government employees” (EPA-HQ-OAR-2009-0923-1507-1)

Comment:

“Please make sure that the oil and gas industry is held accountable now and forever!” (EPA-HQ-OAR-2009-0923-1508-1)

Comment:

“Oil companies should be fined severely and forced to pay for cleanup of the Gulf and ordered to compensate fishing and tourism industries. The time of fossil fuel industries avoiding paying the environmental costs of their practices needs to come to an end now.

Thanks for your consideration” (EPA-HQ-OAR-2009-0923-1509-1)

Comment:

“The fiasco in the Gulf is one among many painful examples that our reliance on fossil fuels poses enormous human and environmental costs in addition to those posed by global warming. The loss of life is tragic, and the scope of the damage from the ongoing Gulf Coast oil spill is already shocking, with many in fishing and related industries now facing the loss of their

livelihoods. We don't know how much or for how long the environmental and economic impacts will be felt. We do know that it is only a precursor to what could happen if global warming pollution is allowed to continue unabated.

You know the old saying. "If something could happen, eventually it will." When the potential consequences are too terrible to imagine, one has to wonder if we should be doing it at all. Certainly the laissez-faire attitude amongst government regulators in the recent past is inexcusable.

Its not realistic to go cold turkey on coal, oil, or other environmentally destructive energy sources we now use. But we have a right to expect that industry will move to adopt the maxim achievable abatement technologies. And as new threats are discovered we expect them to be addressed. Government needs to put standards in place and enforce them in the common interest. Thankfully, the clean energy and energy efficiency solutions that can curb global warming will also create safe, green jobs and provide power without contaminating our land, water, and air. We need to encourage these alternatives. But as a minimum we need to establish procedures to understand, monitor, and minimize risks to the environment. We need also to ensure that the full cost of cleanup and reparations is included in the business plan of corporations and industries that engender risk. If they can't afford to pay for the consequences, they shouldn't be doing it!" (EPA-HQ-OAR-2009-0923-1510-1)

Comment:

"It's vital to inspect and enforce safety codes on ALL offshore drilling!!" (EPA-HQ-OAR-2009-0923-1511-1)

Comment:

"Please insist that no more drilling occurs off shore of the US until all the oil and gas companies have the means to prevent an oil spill like we have in the gulf of Mexico. Please have plenty of engineers and scientists examine what the oil companies are doing and emforce our laws. Please mandate that all oil and gas companies do extensive environmantal impact study before they drill" (EPA-HQ-OAR-2009-0923-1512-1)

Comment:

"Lets also start thinking seriously about other means of producing electricity and running our cars, I know it is easier said than done, but unless we want to completely obliterate this planet we MUST start doing something differently, less harmful and productive. I'm just a citizen that hopes someone certainly more qualified than me will search for other areas to bring about a better solution to this gigantic problem" (EPA-HQ-OAR-2009-0923-1513-1)

Comment:

“I am deeply concerned about what the oil and gas industry is allowed to get away with in this country. At what cost are we going to let this continue? What will it take to finally wake up and do something to protect our environment? We've been aware of the need to wean ourselves off of oil and gas for decades, with little change. The time is long overdue! Won't you please support clean energy?” (EPA-HQ-OAR-2009-0923-1514-1)

Comment:

“I hope that you will lead us differently than the Bushian Nightmare when it comes to our national energy policy. I am tired of being Dick Cheneyed” (EPA-HQ-OAR-2009-0923-1515-1)

Comment:

“I worked for years for the oil industry in exploration worldwide and this recent activity is totally foreign to what I know about the people doing the exploring. When MBA's can tell the professional geologists, geophysicists and petroengineers how to run a well there is something seriously wrong with the program. It is time that the well being and safety of all concerned be taken back and put into the hands of the EPA that will oversee the business of hydrocarbon exploration” (EPA-HQ-OAR-2009-0923-1516-1)

Comment:

“Get rid of all offshore oil drilling, forever” (EPA-HQ-OAR-2009-0923-1517-1)

Comment:

“If we learnr anything watching the grim BP disaster unfolding in theGulf, it's that the oil and gas industry must be held accountable.In fact, they ought be ashamed of themselves” (EPA-HQ-OAR-2009-0923-1518-1)

Comment:

“We as a nation, have to start somewhere sometime somehow and it might as well now with the gas/oil and make them be responsible to the welfare of our environment” (EPA-HQ-OAR-2009-0923-1519-1)

Comment:

“I work in the energy industry and just like some coal companies we reckonize the need for controls please discipline us for evryone's highest good!!” (EPA-HQ-OAR-2009-0923-1520-1)

Comment:

“thank you for your time, nothing is more important than the earth we leave our progeny” (EPA-HQ-OAR-2009-0923-1521-1)

Comment:

“The Australian Petroleum Production and Exploration Association (APPEA) has a Code of Environmental Practice that the US oil exploration industry would do well to copy. It is a real eye opener to view an environmentally cognizant and ecologically responsible code of ethics. Since 2001, there have been 858 fires and explosions in the Gulf, according to the federal Minerals Management Service. On the other hand, During 40 years of exploration and production in Australian waters there have been only six blow outs in over 2,400 wells drilled. Four of these were in the late 1960s and the last one occurred in 1984” (EPA-HQ-OAR-2009-0923-1522-1)

Comment:

“God entrusted to mankind stewardship of creation -- not exploitation” (EPA-HQ-OAR-2009-0923-1524-1)

Comment:

“As of today, with the failure of bp to cap the oil flow, I hope that you can see that we appear to have a tiger by the tail. They are unable to stop the destruction of living things that will come into contact with the oil. They continue to deny that there are vast clouds of semi dissolved oil floating under the surface of the sea” (EPA-HQ-OAR-2009-0923-1525-1)

Comment:

“And, here's a thought. How about requiring that any new drilling demonstrate the ability to handle any problems that occur before we allow them near our waters. BP is using the same inane terminology as was used in 1979 during the terrible disaster that occurred 31 years ago! Same Containment Booms (that don't work), same "Containment Dome" that didn't work; then the "top hat" has called a "sombbrero," and there was also the equivalent of the "junk shot!" Thirty-one years of technology to learn how to drill in deep water; 0 progress when it comes to actually fixing a problem! Why are we allowing these people in out waters? Why are we not

using all our energy and intelligence to put a stop to fossil fuels?! We must create a green future that omits pollution. Or else” (EPA-HQ-OAR-2009-0923-1526-1)

Comment:

“We must show the leadership that puts the environment and the future of our planet before profits. The checks and balances have failed and rules have been lax for too long. This must stop now! Please do the right thing and quit allowing big business to dictate what needs to happen to insure a failsafe system---you must be the gatekeeper!” (EPA-HQ-OAR-2009-0923-1527-1)

Comment:

“This madness has to stop or we will distroy this precious earth we call home” (EPA-HQ-OAR-2009-0923-1528-1)

Comment:

“Don't be afraid to take on big oil The nation is with you. If you don't, you are looking at the future of the world in the gulf of Mexico” (EPA-HQ-OAR-2009-0923-1529-1)

Comment:

“I think all off-shore drilling should be stoped. Put these people to work on ways to make care less dependent on gass as well as other ways to heat homes that are afordable to all home owners not jist rich ones” (EPA-HQ-OAR-2009-0923-1530-1)

Comment:

“It's blatantly obviously that the oil corporations are completely untrustworthy and are run without any sort of conscience or even asense of decency” (EPA-HQ-OAR-2009-0923-1531-1)

Comment:

“Don't let them get out of this one unscathed! This is ridiculous!

Thank you again for your efforts in helping prevent such a catastrophic disaster from happening again” (EPA-HQ-OAR-2009-0923-1532-1)

Comment:

“Please do everything you can to ensure that the oil and gas industry is held accountable for their pollution and destruction of our shared environmental resources.” (EPA-HQ-OAR-2009-0923-1533-1)

Comment:

“Those responsible should be held accountable for their disasterous actions!!!” (EPA-HQ-OAR-2009-0923-1534-1)

Comment:

“PROSECUTE BP!” (EPA-HQ-OAR-2009-0923-1535-1)

Comment:

“Please help to hold these companies accountable!” (EPA-HQ-OAR-2009-0923-1536-1)

Comment:

“Our major industries via their lobbyists, buy their way out of accountability for the pollution they create and the damage their wreak upon our collective environment. CAFO's are given seven years to comply with environmental regulations, and then are still not held accountable for the air/water pollution they cause in almost all places they arefound. ALL industries and financial institutions NEED regulation, and also NEED to be held ACCOUNTABLE when they fail to comply.” (EPA-HQ-OAR-2009-0923-1537-1)

Comment:

“In addition, NO oil company should even begin drilling until they have adequate emergency equipment in place to handle possible leaks, spills, etc., and that equipment's proficiency for the job has been verified by the EPA.” (EPA-HQ-OAR-2009-0923-1537-2)

Comment:

“We can not continue in a situation where the laws are more for show than enforcement” (EPA-HQ-OAR-2009-0923-1538-1)

Comment:

“This disaster should not have happened - making the oil industry accountable will certainly help in the future” (EPA-HQ-OAR-2009-0923-1539-1)

Comment:

“Once this information becomes available, the EPA MUST have the political will to act.” (EPA-HQ-OAR-2009-0923-1540-1)

Comment:

“Let Congress alone to do what's right for our planet” (EPA-HQ-OAR-2009-0923-1541-1)

Comment:

“The oil and gas industries MUST be held accountable for their irresponsible choices that have further threatened an already fragile US economy and have devastating environmental implications. It is HORRIFIC that the industry was not held to a higher standard in the first place, that they were not prepared with a worse case senario plan and that this disaster has no end in sight” (EPA-HQ-OAR-2009-0923-1543-1)

Comment:

“Someone told me the EPA is weak when it comes to corporate america and I would like to see them proved wrong since the EPA has a very mild impact the past 20 years and seems not to have any teeth. Seems like doing the right thing in this country is a thing of the past. Do the people of the EPA have children? I wonder” (EPA-HQ-OAR-2009-0923-1545-1)

Comment:

“The oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1546-1)

Comment:

“We once wondered if Earth was the only planet that supported life, now I wonder if life on Earth can survive Big Oil AND all the human polluters” (EPA-HQ-OAR-2009-0923-1547-1)

Comment:

“In addition I would like to see the people who run the companies who own and operate the oil rig in the Gulf now spewing oil into the ocean brought before the EPA and Congress to explain what is happening and why they can not fix it. People seem to want to blame President Obama. Let's get Dick Cheney of Halliburton into the spotlight, ASAP” (EPA-HQ-OAR-2009-0923-1548-1)

Comment:

“Think of the strides that could have been made toward clean energy with the money which will have to be spent on the massive cleanup of this giant, devastating oil spill in the Gulf of Mexico” (EPA-HQ-OAR-2009-0923-1550-1)

Comment:

“The true costs of petroleum are going unmeasured (except now in the Gulf). Make them safe, and make them pay their fair way to protect the environment” (EPA-HQ-OAR-2009-0923-1551-1)

Comment:

“This current disaster is horrendous and the effects will last for decades. This must not be allowed to happen ever again. Hold big oil accountable!!!” (EPA-HQ-OAR-2009-0923-1552-1)

Comment:

“This cannot happen again.

Thank you for your attention to this letter.” (EPA-HQ-OAR-2009-0923-1553-1)

Comment:

“It has been amply shown the industry will not do what is necessary to provide safeguards against the type of disaster that is occurring in the gulf.” (EPA-HQ-OAR-2009-0923-1554-1)

Comment:

“I have been so impressed by the toughness and determination you have demonstrated since taking office. I hope these traits will help you continue to stand up for cleaner air and less polluting emissions” (EPA-HQ-OAR-2009-0923-1555-1)

Comment:

“All of us in the US have been devastated by the leak allowed to happen in the Gulf of Mexico. The Oil and Gas Industry has been allowed to self regulate drilling.” (EPA-HQ-OAR-2009-0923-1556-1)

Comment:

“Everyone I know is shocked by the massive oil spill (gusher, rather) that is STILL GOING in the gulf. And we are very angry at BP for it'snegligence and priority to escape any blame. This company must pay for the damage.

BP and the rest of the oil companies must be included in the greenhouse gas reporting rule, and the EPA must stand firm in making the industry do so” (EPA-HQ-OAR-2009-0923-1557-1)

Comment:

“If we have learned anything from watching BP's efforts to deal with the disaster unfolding in the Gulf, it's that the oil and gas industry should be held accountable like any other industry” (EPA-HQ-OAR-2009-0923-1558-1)

Comment:

“The public must be able to hold polluters accountable for their failures to control the predictable discharge of greenhouse gases. When our Congress, many of whose members depend on pro-industry lobbies for their campaign contributions, deliberately make it easy for them to avoid accountability, the public is kept in the dark. You have the power to keep the public informed. I expect you to use that power” (EPA-HQ-OAR-2009-0923-1559-1)

Comment:

“I am really disappointed that hay wasn't and isn't being used to remove the oil from the water. Such a cheap, easy and effective solution” (EPA-HQ-OAR-2009-0923-1560-1)

Comment:

“They should also be required to state how they plan to clean up a disaster because obviously as of now, they don't know.

Not knowing, they need to be seriously limited on where they can drill” (EPA-HQ-OAR-2009-0923-1560-2)

Comment:

“Please make sure that the gas and oil industry systems use rigorous, detailed, direct pollution measurements and that the industrys emissions are included in the reporting system as soon as possible” (EPA-HQ-OAR-2009-0923-1561-1)

Comment:

“More than that, I urge on site monitoring for all deep water drilling rigs. I urge that back-up plans for the future failures are in place BEFORE any oil leases are awarded.

Most of all, I urge NO DRILLING IN THE ARCTIC, ANWR, CHUKCHI SEAS or BEAUFORT SEAS. Any and all oil leases for these areas should be immediately CANCELED” (EPA-HQ-OAR-2009-0923-1562-1)

Comment:

“If you need help becoming responsible for the BP spill and other degradations to our natural resources - read Greg Palast reports. He actually presents an unbiased and factual accounting. You might not like it, but you can become a better representative of the people. Thank you a lot” (EPA-HQ-OAR-2009-0923-1563-1)

Comment:

“The people of this country are SICK AND TIRED of big business doing whatever they want. They get in the back pockets of our congressman and dictate the policy of this government. Lets make it mandatory to limit all politicians to 2 terms” (EPA-HQ-OAR-2009-0923-1564-1)

Comment:

“The time for change is long overdue, and the consequences of our inaction have been catastrophic. The fouling of our oceans, especially along the Gulf Coast, needs to end - and the Oil companies responsible for the pollution need to be held accountable financially and morally. Help our country move our sights toward green, renewable sources of energy.

Thank you” (EPA-HQ-OAR-2009-0923-1565-1)

Comment:

“I support the EPA decision to hold the oil and gas industry accountable for their pollution and global warming emissions. I would like to see a total ban on drilling in the ocean” (EPA-HQ-OAR-2009-0923-1566-1)

Comment:

“Enough is enough! How many tragedies will it take to get people to open their eyes? Move up the dates to come up with alternative energy sources. Force these oil companies to comply - NOW!” (EPA-HQ-OAR-2009-0923-1567-1)

Comment:

“Drill baby, drill as Sarah would say” (EPA-HQ-OAR-2009-0923-1568-1)

Comment:

“DO THE RIGHT THING! Hold them accountable. It will cost everyone more, but I'm happy to pay extra at the pump, to preserve the environment!” (EPA-HQ-OAR-2009-0923-1569-1)

Comment:

“HOLD OIL COMPANIES ACCOUNTABLE!” (EPA-HQ-OAR-2009-0923-1570-1)

Comment:

“Also, if this means your agency will need a bigger budget to hire more people to monitor and inspect, then so be it. You have my support to go to Congress and the President to ask for "enforcers" ! Please make the agency do what it is supposed to do” (EPA-HQ-OAR-2009-0923-1571-1)

Comment:

“Now, more than ever, is the time to act on behalf of the earth, our beautiful planet which is our home! We have been exploiting her for too long, with our unsustainable, egotistical way of life. No more acts of ecocide, denial and self-enriching stupidity! Now is the time to take responsibility for the much needed change towards sustainability, in order to secure some future for the next generations!

Thank you in advance for reading my plea” (EPA-HQ-OAR-2009-0923-1572-1)

Comment:

“We haven't even begun to realize the devastation that this spill will cause in our oceans and the untold death of species. Without healthy oceans the human race cannot survive. Why are we playing roulette without future” (EPA-HQ-OAR-2009-0923-1573-1)

Comment:

“Our environment cannot afford another disaster. The damage it has caused is awful!” (EPA-HQ-OAR-2009-0923-1574-1)

Comment:

“I am astonished by how lax the U.S. government has been in controlling environmental pollution by oil companies. If any industry has the funds to prevent pollution of our environment, the oil industry does. The EPA must hold the oil industry more accountable for its pollution” (EPA-HQ-OAR-2009-0923-1575-1)

Comment:

“Would really like it if these huge companies put the good of the country before their personal profits. If they respected the people and existed to serve them, the people would respect the companies and support them. But things have gotten all out of whack with everyone hating everyone else, and it doesn't have to be like that. Please set some boundaries for these companies so they can learn how to be part of the family of man.” (EPA-HQ-OAR-2009-0923-1576-1)

Comment:

“The companies obviously don't care, so someone has to. Please stop their uncontrolled destructive actions. They are blackmailing all of us because they think there is no other way to support energy” (EPA-HQ-OAR-2009-0923-1577-1)

Comment:

“IF I KNOW ANYTHING IT IS THAT THE OIL INDUSTRY ARE LIARS & CROOKS AND ONLY CARE ABOUT THE GREE OF MONEY INSTEAD OF THE GREEN OF EARTH” (EPA-HQ-OAR-2009-0923-1578-1)

Comment:

“I want you to do the right thing the best way you can. Remember, your children and your descendants will be paying the price too.

NO ONE ESCAPES THE POISONING OF THE EARTH” (EPA-HQ-OAR-2009-0923-1579-1)

Comment:

“PLEASE HOLD the OIL and GAS INDUSTRY RESPONSIBLE for their damage,corruption, and destruction! ENOUGH of NO ONE paying for their misdeeds.

Please Mr. President, let's put the focus on wind & solar for out energy!!!!!!!!!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-1580-1)

Comment:

“This is a tragic situation, Hopefully it will never happen again. I wonder if you have personally been there, and helped clean up, held a distressed animal in your hand in your hand., or seen the eyes of one whose lively hood has suffered” (EPA-HQ-OAR-2009-0923-1581-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.Not just after the fact, paying for clean ups that take generations to finish.

I believe it is important for us to be able to measure the reductions in pollution as the result of cleaner energy and conservation efforts are made” (EPA-HQ-OAR-2009-0923-1582-1)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore - and onshore - oil and gas industry in the system. I strongly support that decision. This is the only way we will know if our efforts to reduce global warming are having a positive effect” (EPA-HQ-OAR-2009-0923-1582-2)

Comment:

“Our addiction to oil is destroying the planet from an ecological angle as well as wars in the Middle East and Africa. Our descendants deserve better from us” (EPA-HQ-OAR-2009-0923-1583-1)

Comment:

“We also must hold our EPA accountable for their ability to take strong, effective measures to insure our environment is really protected. The EPA must act as the final steward and protector for all the attacks on this country's finite natural resources today, tomorrow, and all the future” (EPA-HQ-OAR-2009-0923-1584-1)

Comment:

“The government must do for us what we cannot do for ourselves--that's an old, conservative axiom. Regulating big business is precisely that. We need protection. The environment needs protection. And that's the job of the EPA. Please do your job. Thank you” (EPA-HQ-OAR-2009-0923-1585-1)

Comment:

“I also believe that the effect of this most recent spill is catastrophic and that if need be, we use our armed forces for clean up support as we have done with other natural disasters. SOON!” (EPA-HQ-OAR-2009-0923-1586-1)

Comment:

“It is very likely that we, the taxpayers, will pay for the clean-up of the Gulf oil spill while the oil industry continues to post record profits. Requiring them to report their carbon emissions could lead to their paying for some of the damage to the environment their industry has caused” (EPA-HQ-OAR-2009-0923-1587-1)

Comment:

“All the BP-America executives should be indicted for destroying the Gulf of Mexico ecosystem. It's time to quit messing around with these people. Charge them under all applicable EPA, NOAA and NPS authority. Just as James Carville said, "Heads must roll!" They have poached the entire ecosystem there, caused many tens of billions in damages. No different than a poacher in a National Park or Seashore destroying federal property. They need to see the President's federal power. Arrest all BP executives, 10 years in prison and a 100 billion dollar fine!

Now, maybe after 35 years of stonewalling the United States will finally pass a tough, comprehensive national clean energy economy policy! It's inexcusable that an entire ocean ecosystem had to be destroyed for a decade including possible irrecoverable impacts, for America to finally wake up and get their heads out of the sand!” (EPA-HQ-OAR-2009-0923-1588-1)

Comment:

“How can the U.S. claim any credibility at home or abroad while allowing big business to dictate who does or does not have to abide by the rules? There is one big problem in our system right now ...CORPORATE GREED. It stands in the way of doing what the American people want and all that is Holy!” (EPA-HQ-OAR-2009-0923-1589-1)

Comment:

“The oil and gas industry has run roughshod over regulators, legislators and the rest of us citizens for its entire existence - THIS CANNOT CONTINUE. The earth's biological, ecological, hydrologic and atmospheric systems cannot sustain the continued assault and then be expected to regenerate to health and purity unless men and governments take a stand.

Please, Administrator Jackson, take the stand you know is right for all of us” (EPA-HQ-OAR-2009-0923-1590-1)

Comment:

“The negligible (2 percent) amount of our oil consumption produced by off-shore drilling is clearly not worth the horrendous risks to the health of our people and our environment. However, as long as the oil companies are allowed to drill either on- or off-shore, they must be held to the strictest safety measures and pollution limitations.” (EPA-HQ-OAR-2009-0923-1591-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the public at large has become complacent in its faith in big companies and their use of technology. We take their word that they know what they are doing.

We take their word that there's nothing to worry about....that they have fail safe systems....that there won't be an problems....that all is well.

NOT TRUE” (EPA-HQ-OAR-2009-0923-1592-1)

Comment:

“I urge you to take steps to make sure the disaster in the Gulf never happens again” (EPA-HQ-OAR-2009-0923-1592-2)

Comment:

“WHY AREN'T WE TAKING THE BIG SUBSIDIES AWAY FROM BIG OIL AND COAL AND USE THOSE FUNDS TO PUT SOLAR ON EVERY ROOF IN AMERICA?? WE WOULDN'T NEED TO DESTROY DESERT HABITAT FOR HUGE SOLAR ARRAYS, WE WOULDN'T NEED TO DESTROY THE BAYS FOR HUGE WIND FARMS, WE WOULDN'T NEED TO REBUILD HUGE TRANSMISSION LINES TO GET THE POWER FROM THE SOURCE TO THE CUSTOMERS, WE WOULDN'T NEED DIRTY, POLLUTING OIL, COAL, NUCLEAR, ETHANOL, ETC. THEY ALL HEAT OUR PLANET

AND CONTINUE TO DO DAMAGE. SOLAR IS HERE NOW. IT'S READY TO GO, AND HAS NO DOWN SIDE. BRING OUR COUNTRY BACK AS A LEADER OF TRULY CLEAN ENERGY - LET'S MANUFACTURE OUR OWN EQUIPMENT, INSTALL THEM AND SERVICE THEM AND PUT HUNDREDS OF THOUSANDS OF PEOPLE BACK TO WORK AND SAVE THE ENVIRONMENT. NOW. REALLY” (EPA-HQ-OAR-2009-0923-1593-1)

Comment:

“We messed up once... let's not do it again” (EPA-HQ-OAR-2009-0923-1594-1)

Comment:

“I understand the industry lobbied its way out of the mandatory greenhouse gas reporting rule. Why do they fear tracking their pollution emissions? It doesn't take long to figure out why.” (EPA-HQ-OAR-2009-0923-1595-1)

Comment:

“We need to move forward towards our future and get free of Gas and Oil addition, which is not only expensive for our environment, but also to national security, in the end to our pocket books. Instead of "drill baby drill" lets "GROW BABY GROW" our fuel. Lets put the Middle america farmers back to work to make ethenol our fuel of homegrown choice!” (EPA-HQ-OAR-2009-0923-1596-1)

Comment:

“I spent the weekend in South LA. I can't help in the clean up yet because I don't have HAZ MAT training, but I signed up as a volunteer (waiting for a call) & went down there anyway. On Sunday before heading home, I drove all the way out to the coast & across the 5mi bridge to Grand Isle, LA. It was like a ghost town almost. From the levee (as far as the authorities will let anyone unauthorized go) I could see that there were a few guys in white suits cleaning up tarballs on the beach... More of 'em seemed like they were sitting around waiting for something to do... Meanwhile in the distance you could see boons placed up against the marshes and no one at all seemed to be out where the oil was, But there were plenty of police to make sure no one tried to go out there... I wouldn't have anyway... I don't want to get stuck in the oil any more than the birds and other wildlife do. Talked to a few locals and its all the same sad, frustrated out of work stories. South Louisiana is in a strangle hold... and if there's a hurricane that hits... I don't even want to think about it. Everybody... including me... is convinced that no matter what BP tries between now & then the oil is just going to keep coming until one of the two relief wells is complete and the pressure is relieved...Then it could still be a month or so after that that the oil

keeps washing up... (I hope I'm wrong). I took some pics of the way it is right now, since most of the oil is still off shore. This is just the beginning for these poor people and their paradise lost. They've got to feel like their way of life is just crumbling all around them. I hurt for them all. We must learn everything we can from this disaster. We have to make sure nothing like this ever happens again and that the oil and gas industry is held accountable for anything & everything they ever do again” (EPA-HQ-OAR-2009-0923-1597-1)

Comment:

“Although, I live in Idaho, I view this disaster as the worst that man has committed in the last century. The federal government should hold the entire oil industry and gas industry accountable for this disaster. The regulations should be monitored all polluting industries vigorously. The health of our people and our planet should be your number 1 priority” (EPA-HQ-OAR-2009-0923-1598-1)

Comment:

“I am appalled at the tragedy in the Gulf! If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable. No more lobbying its way out of the mandatory greenhouse gas reporting rule! That would have tracked the industry's massive global warming pollution emissions” (EPA-HQ-OAR-2009-0923-1599-1)

Comment:

“As an eighth grade science teacher, it's clear that many young adults are disheartened by the BP disaster in the Gulf. They deserve to see a cleaner and brighter future. Please help to make sure that companies responsible for emitting greenhouse gases will be accountable for accurately tracking their emissions” (EPA-HQ-OAR-2009-0923-1600-1)

Comment:

“In addition, we must move away from offshore drilling, the latest BP disaster is shameful! We must ensue a full out effort to eliminate fossil fuel from our energy portfolio!!!!” (EPA-HQ-OAR-2009-0923-1601-1)

Comment:

“The oil companies cannot be trusted. They will kill us all if we do not stop them” (EPA-HQ-OAR-2009-0923-1602-1)

Comment:

“Let's stop giving these guys the benefit of the doubt. Thank you!” (EPA-HQ-OAR-2009-0923-1603-1)

Comment:

“I am not an alarmist by nature but optimistic that we can find other sources of energy other than our reliance on drilled oil” (EPA-HQ-OAR-2009-0923-1604-1)

Comment:

“As a resident of southern New Mexico, I know the value of clean skies and safe water. The recent Gulf spill has made me think about our environment in very personal terms. I realize that only stringent regulations stand between my local environment and ecological disaster such as the one Americans on the Gulf Coast are experiencing as I write” (EPA-HQ-OAR-2009-0923-1605-1)

Comment:

“The well-being of all are citizens are in your hands” (EPA-HQ-OAR-2009-0923-1605-2)

Comment:

“The BP oil spill in the Gulf of Mexico proves without a doubt that We, The People deserve the best technology, installations, information, and safeties regarding all environmental operations. That includes coal mining, oil drilling, nuclear power, and so-called clean energy. The recent spill proves that one error (no matter how slight) can have devastating consequences, and this oild spill will most likely have international implications.” (EPA-HQ-OAR-2009-0923-1606-1)

Comment:

“We cannot let big oil dictate to us the American people ever again, we must show them they are NOT in charge of this country” (EPA-HQ-OAR-2009-0923-1607-1)

Comment:

“Don't wait until another disaster happens. FIX this error now! by requiring all safety regulations and environmental assesments are done BEFORE ANY permits are allowed.

Please make sure BP pays for it's crimes. In fact,. the EPA should take over this project as BP

has failed miserably. Why are you letting a foreign company come in to our US waters and create such havoc without any accountability???

Please step in and take control of this disaster to mitigate its effects now!" (EPA-HQ-OAR-2009-0923-1608-1)

Comment:

"The oil and gas industry must be held accountable" (EPA-HQ-OAR-2009-0923-1609-1)

Comment:

"I lived for years outside Houston and would see on Sundays the big oil firms flaring giant plumes into the air while no one was at work at the TX environmental agency -- and they were supposed to self-report their "accident".. It is time the federal government got really tough on the oil industry. Please do not exempt them from any environmental law. I also think deep water drilling should be stopped permanently" (EPA-HQ-OAR-2009-0923-1610-1)

Comment:

"We cannot improve our way of life on this planet if we do not even collect the necessary information to know what we are doing now. the greenhouse gases produced by the oil industry need to be measured and reported accurately to give us all the information needed to improve how we deal with our planet" (EPA-HQ-OAR-2009-0923-1611-1)

Comment:

"The earth and our bodies are becoming increasingly polluted. To help fix these problems and to help scientists, citizens and agencies understand the severity of them, we need to know how much, from where and from whom, the pollutants originate" (EPA-HQ-OAR-2009-0923-1612-1)

Comment:

"We've had enough! Stop the corruption and congress' protection of corporate oil" (EPA-HQ-OAR-2009-0923-1613-1)

Comment:

"I have heard of the efforts by the drilling company and BP to limit financial damages for cleanup of the horrible oil spill. As if money alone will bring back the ecosystem to where it was

before the spill, and the hundreds of thousands of dead animals would be brought back by merely paying for the cleanup. The cynical actions on the industries' part to absolve themselves from full accountability is downright disgusting" (EPA-HQ-OAR-2009-0923-1614-1)

Comment:

"Please know that there is great support for tightening the reins on BIGOIL. The working public needs clean air, water, and land. We need a planet with a future. Our vision for the future includes a viable planet thriving with life. BIG OIL doesn't seem to care about anything but offshoring their huge profits and evading taxes. I urge you to act with courage and conviction to hold BIG OIL accountable" (EPA-HQ-OAR-2009-0923-1615-1)

Comment:

"Oil and gas operations contribute significantly to GHG emissions and the global warming problem. They must be required to report!" (EPA-HQ-OAR-2009-0923-1616-1)

Comment:

"Please see that oil drilling is stopped immediately and prevent any further destruction to our environment and livelihood" (EPA-HQ-OAR-2009-0923-1617-1)

Comment:

"What horrible devastating event must occur before those people in charge of the decisions will understand that we MUST hold the oil and gas companies accountable for their actions. Future generations are counting on us to do the right thing" (EPA-HQ-OAR-2009-0923-1618-1)

Comment:

"As an American citizen, I rely on your proactive protection of my right to complete disclosure from all corporations that benefit from our natural resources at the expense of our health, financial resources and the environmental services they threaten!

I insist you ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system immediately" (EPA-HQ-OAR-2009-0923-1619-1)

Comment:

“Although the most important thing for the big picture is to lose our dependency on oil and gas by developing alternative energy technologies. We are technologically advanced enough to do this, and we need to do this to save the earth” (EPA-HQ-OAR-2009-0923-1620-1)

Comment:

“I urge you in the strongest terms to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible” (EPA-HQ-OAR-2009-0923-1621-1)

Comment:

“A disaster is continuing in the Gulf of Mexico, and if we learn anything from this, it's that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1622-1)

Comment:

“This disaster has shown the American people that it is time to REGULATE corporations! Enough of the wishfull thinking, hands off approach that only ends up costing taxpayers for clean up cost of environmental disasters caused by corporate ineptitude and safety short cuts! This is socialism for the rich and well lobbied corporations. Privatize the gains and socialize the losses. It is time to make corporations pay their share and comply with much stricter regulatuaion!” (EPA-HQ-OAR-2009-0923-1623-1)

Comment:

“Make sure the system uses rigorous, detailed, direct pollution measurements as soon as possible” (EPA-HQ-OAR-2009-0923-1624-1)

Comment:

“Accountability should be the cornerstone of environmental regulation. There can be no exceptions” (EPA-HQ-OAR-2009-0923-1625-1)

Comment:

“Please do not allow the Oil and Gas Industry to poison our country and our children while keeping the public in the dark !!!” (EPA-HQ-OAR-2009-0923-1626-1)

Comment:

“Gathering data seems like an essential first step in coming to terms with this problem.” (EPA-HQ-OAR-2009-0923-1627-1)

Comment:

“I would like to add my support to hold everyone accountable for reporting greenhouse gas emissions including the oil and gas industries. Living in the DFW area we see the affects daily of engine emissions by gas well drillers. Witnessing the unfolding disaster in the Gulf makes it difficult to swallow daily media bombardment by these same companies demonstrating how Green they are. I cannot help smiling at the cunning demonstration of their research into using algae to absorb carbon dioxide and their immaculate undersea diagrams of multiple underwater oil wells linked to the pristine central underwater collection points. If they are so wonderful let them show us the numbers. If they are so green clean why would the industry lobbied its way out of the mandatory greenhouse gas reporting rule? I surmise that their global warming pollution emissions are massive” (EPA-HQ-OAR-2009-0923-1628-1)

Comment:

“As as child I always cheered the US Cavalry, as an adult and a scientist I now cheer the EPA, that is now emerging from the irresponsible constraints put on them by previous administrations. We may save the human race yet!” (EPA-HQ-OAR-2009-0923-1628-2)

Comment:

“We are counting on you to take strong measures” (EPA-HQ-OAR-2009-0923-1629-1)

Comment:

“Any business that can cause the damage that the gas and oil industrys can must not be exempted from the reporting system” (EPA-HQ-OAR-2009-0923-1630-1)

Comment:

“The era of writing a blank check to the oil industry in the name of national security needs to come to an end. Our future needs to be with an energy source that does not pull carbon from the ground and put it into the air. For at least the past decade, our dependance on oil has weakened our country and strengthened many of those we end up fighting against” (EPA-HQ-OAR-2009-0923-1631-1)

Comment:

“We can never have this happen again.
The media is talking about oil on the beach.
They have not even addressed the toxic chemicals that will be in the
air because of the oil spill.

LETS ALL MAKE AN EFFORT TO LESSEN OUR DEPENDENCE ON OIL AND WORK
TOWARD ALTERNATE FUELS NOW” (EPA-HQ-OAR-2009-0923-1632-1)

Comment:

“Please make these people accountable for the mess they make.....” (EPA-HQ-OAR-2009-0923-1633-1)

Comment:

“I listened to a recent rousing talk by Gina McCarthy who came back to CT to deliver a keynote to a Yale Climate and Energy Institute. In it she invoked the need to stand firm and once and for all enforce the laws that EPA has at its disposal, not the least of which is regulating atmospheric carbon, in all of its forms whether gaseous or or blackcarbon soot. And while you are at it, maybe we should re-address the phenomenal lack of enforcement on the purveyors of hydrocarbons before their oil or coal even gets to the source of combustion. The environmental disasters of MTR coal mining and excessively deep water oil and gas drilling have to be responsibly regulated and addressed. Start with the carbon itself as Gina made it clear you intended to do regardless of our rubber spined legislators and their D.O.A."Climate and Energy Bill” (EPA-HQ-OAR-2009-0923-1634-1)

Comment:

“These companies should not be allowed to reape huge profits while polluting our environment without accountability” (EPA-HQ-OAR-2009-0923-1635-1)

Comment:

“As a resident of New Mexico, a large gas and oil state, I am particularly concerned that the EPA take strong action on Gas and Oil Reporting” (EPA-HQ-OAR-2009-0923-1636-1)

Comment:

“We must act now to keep our oceans, air, and planet from succumbing to greed, apathy, and ignorance” (EPA-HQ-OAR-2009-0923-1637-1)

Comment:

“We cannot afford to have additional oil spills such as the one with BP” (EPA-HQ-OAR-2009-0923-1638-1)

Comment:

“I would also like to see the EPA include the real pollution measurements not only of the industry's emissions but also the pollution of the products they produce. These figures should be factored into future energy decisions going forward” (EPA-HQ-OAR-2009-0923-1639-1)

Comment:

“We must hold the oil and gas industries responsible for upholding the Environmental Laws set forth by the EPA under the Clean Air and Water Acts. For too long they have gotten away without strict enforcement of these Laws at the continued peril of the health of the human race and the planet. Our government must stand strong against these polluting industries and their lobbyists and hold them accountable. Our people are depending on our Representatives in Congress and the U.S. Courts to protect the rights and well-being of us all. We need the power of government to stop environmental disasters from happening, and halt greenhouse gas emissions by enforcing the Laws. The EPA's decision to include industry's emissions in the reporting system is wise” (EPA-HQ-OAR-2009-0923-1640-1)

Comment:

“This year, the EPA is proposing to set things right and finally include the offshore - and onshore - oil and gas industry in the mandatory greenhouse gas reporting system” (EPA-HQ-OAR-2009-0923-1641-1)

Comment:

“I request that you require the gas/oil companies to report greenhouse gas emissions. We need to start now to formulate a strategy to deal with global climate change with these companies as part of the equation. I'm tired and frustrated listening the same old politics where corporations worm their way out of everything - we need Change!!!” (EPA-HQ-OAR-2009-0923-1642-1)

Comment:

“It's way past time that the oil and gas industry be held accountable” (EPA-HQ-OAR-2009-0923-1643-1)

Comment:

“THIS REALLY MATTERS!!!!!!” (EPA-HQ-OAR-2009-0923-1643-2)

Comment:

“They must be held responsible for the detriment to our ecosystems. Without these we cannot survive, and Big Oil is proving more and more that they care nothing about our ability to survive on this planet, as long as they make the big bucks” (EPA-HQ-OAR-2009-0923-1644-1)

Comment:

“We do not even know yet what the cost of devastation to wildlife, aquatic life, plant life and shore line in the Gulf and elsewhere will be, but they are going to be enormous. How many species of each of those categories will become extinct? We don't know that either, but at least you and the EPA now care about those important items, in contrast to your predecessors who did not care how their regulation affected nature.

It is past time that you with your Obama -approved power can set rigid guidelines so that this willy nilly drilling w/o regard to results can follow a plan that will protect wildlife and still provide humans with some luxurious services until better forms of energy become available at a reasonable cost. It is obvious that the cost of drilling for petroleum in wildlife threatening places is quickly becoming prohibitive.

Please devise rigorous, detailed and direct pollution management guidelines for the oil industry to follow as quickly as possible.” (EPA-HQ-OAR-2009-0923-1645-1)

Comment:

“Please hold the oil companies accountable. We will lose all the advances in making our environment cleaner if you do not” (EPA-HQ-OAR-2009-0923-1646-1)

Comment:

“OBVIOUSLY WE MUST NOT DRILL IN THE ARCTIC AT ALL! BIG OIL MUST BE STOPPED BEFORE EVERYTHING IS KILLED!!! THE AREA WHERE SHELL WANTED TO DRILL HAS ICY FLOWING WATERS HEAVY STORMS, GALING WINDS, DARKNESS, & SUBZERO TEMPERATURES and there is NO WAY TO CONTROL A SPILL IN ICY WATERS AND GET RID OF THE OIL SPEWING OUT!!! ALL OUR WILDLIFE WOULD BE KILLED AND DIE HORRIBLE DEATHS! THE AREA WOULD BE DESTROYED TOTALLY!!! IT IS TIME TO THINK SENSIBLY & ACT INTELLIGENTLY BEFORE OUR WORLD IS TOTALLY DESTROYED!!!” (EPA-HQ-OAR-2009-0923-1647-1)

Comment:

“Perhaps we need to force by changing ourselves, our policies and our laws. Fossil fuels are finite. Sooner, rather than later, it will run out. All fossil fuels emit cancer causing emissions when burned. The source of all our energy is the Sun. So directly tapping all that wasted solar energy seems most reasonable and, with much effort, could be practicable.

Treat Big Energy exactly the same as we treat all other businesses: no exemptions, no special considerations. Take that money and invest it in rewarding scientists who develop consumer grade, ultra-high-capacity batteries and electricity control methods. Put NASA's 40-percent efficient solar panels on the market. If they are presently too expensive, reward those who can manufacture them inexpensively.

We've already set up a bad situation for our children and their children, let's do something nice for them now!” (EPA-HQ-OAR-2009-0923-1648-1)

Comment:

“The darkness in the Gulf waters is like the darkness the oil and gas industry likes to hide in, Beyond People, not Beyond Petroleum. Simple justice demands they be held accountable and monitored if earth is to have a chance to detoxify their effects on the environment” (EPA-HQ-OAR-2009-0923-1649-1)

Comment:

“We need a Marshall Plan for clean energy! Wind/Solar/Geothermal are the future their punishment for the banks could be to fund the project with a 1% return and the rest goes to the taxpayer!

LETS GET CREATIVE!!!” (EPA-HQ-OAR-2009-0923-1650-1)

Comment:

“The American people are demanding that the EPA do it's job to protect our environment, not those that pollute” (EPA-HQ-OAR-2009-0923-1651-1)

Comment:

“I believe BP was also responsible for the Valdez mess in Alaska. WE have had enough. About time to begin refitting your operation to give us safe, green energy. The science is already here,

but we need the big money people like BP to own up to their responsibilities to the Earth and every living thing on the Earth. Man up!!!” (EPA-HQ-OAR-2009-0923-1652-1)

Comment:

“Neither the oil and gas industry, the power industry, the auto industry, the metal-refining industry, nor any other industry, including the US Military and its sorry lot of contractors, should be allowed to hide their respective contributions to the accumulating pollution.

To take any other position is to sell out to the corporate rapists; it would be unworthy of any Government, Democratic, Republican, Whig, Confederate, Liberal, Conservative, Progressive, Troglodyte, Labour, Tory, or TeaParty, whatever the hell that is becoming.

If corporations continue to insist upon hiding this data, then the Administration and your Agency need to seek the power to gather the data by the most intrusive means they can devise, in order to annoy and penalize this bunch of charlatans. ” (EPA-HQ-OAR-2009-0923-1653-1)

Comment:

“IF WE'VE LEARNED ANYTHING, IT'S THAT FOSSIL FUELS ARE NOT THE ANSWER. SOLAR AND WIND ENERGY ARE” (EPA-HQ-OAR-2009-0923-1654-1)

Comment:

“The BP oil spill is already far worse than the 1989 spill in PrinceWilliam Sound in Alaska. This cannot be deemed acceptable! BP must be held fully accountable for their blatant greed” (EPA-HQ-OAR-2009-0923-1655-1)

Comment:

“BP also has a long history of death and mismanagement that is always swept under the rug by money and lawyers. It's time for the American public to be protected from corporations who shun their responsibilities all in the name of profits!” (EPA-HQ-OAR-2009-0923-1656-1)

Comment:

“The massive oil spill in the gulf is a CRIME AGAINST NATURE. It is a crime against person's livelihoods in the gulf & ruins a reliable food source. The oil industry, by political finger pointing and placing the blame on " others", is trying to evade responsibility for the damage it causes. This is a crime as well! The oil industry has the money to clean up the increasing oil spill

damage it is causing daily in the gulf. It needs to take full responsibility!!” (EPA-HQ-OAR-2009-0923-1657-1)

Comment:

“THIS MUST BE DONE AS SOON AS POSSIBLE FOR THE PROTECTION OF OUR RESOURCES, ENVIRONMENT AND ALL LIVING THINGS THAT NEED CLEAN AIR, WATER, AND FOOD!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-1658-1)

Comment:

“Standards setting and monitoring are surely not enough to protect our environment and our health. Along with these critical functions, I urge EPA to work to ensure enforcement by working with other agencies, including the Department of Justice, to pursue violators of EPA regulations and hold them responsible for the harm they do to the environment and public welfare” (EPA-HQ-OAR-2009-0923-1659-1)

Comment:

“Do these CEOs not understand that we all share the same planet? Some of us are less able to relocate following a disaster (Hurricane Katrina?) than others. What part of the world do these executives plan to live into escape this man-made disaster? The domino effect, the devastation to ecological systems and food chains in mind-boggling!

Save the planet for ALL of us!!” (EPA-HQ-OAR-2009-0923-1660-1)

Comment:

“Global warming has long been a concern to me as a resident and property owner in the low lying Florida Keys, where our reefs are already showing the effects of warmer oceans. Now with the Gulf suffering the effects of the BP negligence I am more sure than ever that we need our government to protect us against the companies whose primary mission is profiting from publicly owned resources” (EPA-HQ-OAR-2009-0923-1661-1)

Comment:

“We do not see this disaster as merely a one time accident and we hope that the entire nation will begin to see that change and responsibility need to be accepted throughout the oil and gas industry, as well as, in the general public if we are ever going to solve our environmental problems before they overwhelm us” (EPA-HQ-OAR-2009-0923-1662-1)

Comment:

“If we measure and price the pollution and emissions, solar, wind and geothermal become competitive in price. Give us clean energy” (EPA-HQ-OAR-2009-0923-1663-1)

Comment:

“The gulf oil spill is a disaster--"so big and so deep and so wide"--that it will take years to recover from; if in fact it is possible to recover completely. Some of the ecologic damage may well be irrevocable. That it could happen at all is criminally negligent, and the perpetrators need to be held accountable. Further, a bright light needs to be focussed on all such endeavors; focussed, and kept focussed. Any laxity in oversight will simply result in more such disasters” (EPA-HQ-OAR-2009-0923-1664-1)

Comment:

“Oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1665-1)

Comment:

“Please do what you can to salvage whats left of our national resources!” (EPA-HQ-OAR-2009-0923-1666-1)

Comment:

“It is important to remember that there are many more American citizens than there are oil and gas companies or even people who work for oil or gas. The first obligation must be to the American people as a whole rather than these special groups” (EPA-HQ-OAR-2009-0923-1667-1)

Comment:

“Please do not let the oil companies ruin our environment and then use tax payer monies to pay for their botches” (EPA-HQ-OAR-2009-0923-1668-1)

Comment:

“The horrific BP disaster unfolding in the Gulf has clearly demonstrated that the oil and gas industry must be regulated and held accountable” (EPA-HQ-OAR-2009-0923-1669-1)

Comment:

“It is time to push hard for clean, renewable energy. We have solar hot water and 30 PV panels on our house and generate nearly all the power we need. IT IS NOT HARD OR EXPENSIVE to do what we are doing. We live in a rainy valley with over 100 inches of rain per year” (EPA-HQ-OAR-2009-0923-1670-1)

Comment:

“Last year, the oil and gas industry was not included in the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions” (EPA-HQ-OAR-2009-0923-1671-1)

Comment:

“I had no idea that the oil and gas industry pollution emissions were not being carefully checked and monitored. It is essential that this oversight be corrected! We need correct information, accurate tracking information, as a starting point for pollution control and climate change reduction. We also need a massive public education campaign to reduce energy consumption” (EPA-HQ-OAR-2009-0923-1672-1)

Comment:

“I am seeing a very disturbing pattern that must end. This should be the last straw!” (EPA-HQ-OAR-2009-0923-1673-1)

Comment:

“Please include the oil and gas business in the reporting system as outlined below. Besides the damage in the Gulf and the lack of accountability, the other far reaching consequence is our confidence that government agencies will protect the good of all citizens” (EPA-HQ-OAR-2009-0923-1674-1)

Comment:

“And while you're at it, will someone please take a look at the clean-up material being produced by the guy CNN keeps featuring! He seems to be on to something and that goo needs to be eradicated while we wait for relief wells to stop the flow” (EPA-HQ-OAR-2009-0923-1675-1)

Comment:

“This country should never, ever have to go through a disaster like this again. Please do the right thing” (EPA-HQ-OAR-2009-0923-1676-1)

Comment:

“The oil companies must not continue same old, same old. They must be held accountable for ALL their pollution, onshore & offshore -NOW!” (EPA-HQ-OAR-2009-0923-1678-1)

Comment:

“Also, plans for any kind of further drilling must be scrutinized to the utmost of our capabilities before being allowed to proceed. Big Oil must not be in charge of these delicate operations” (EPA-HQ-OAR-2009-0923-1679-1)

Comment:

“I'm an ordinary citizen who is appalled by what's going on in the Gulf. It's so vast and so awful, I can't really wrap my mind around it. I have to look to you and your agency to protect our fragile environment from the ravages of corporate greed” (EPA-HQ-OAR-2009-0923-1680-1)

Comment:

“Don't let these major polluters weasel out again” (EPA-HQ-OAR-2009-0923-1680-2)

Comment:

“It appears very irresponsible to have allowed the drilling to continue or even be approved when there were no safety considerations already in place, and no backup plan when something fails” (EPA-HQ-OAR-2009-0923-1682-1)

Comment:

“BRITISH petrol? What's up with that? Our coast line should have American companies screwing it up, don't you think?” (EPA-HQ-OAR-2009-0923-1683-1)

Comment:

“And now we in New York State are fighting to keep natural gas drillers from spoiling the environment by drilling into the Marcellus Shale under the Watershed. Keep them out!” (EPA-HQ-OAR-2009-0923-1684-1)

Comment:

“They need to pay for what they have done” (EPA-HQ-OAR-2009-0923-1685-1)

Comment:

“QUIT MESSING AROUND. If you all can't handle the problems step aside & let someone else get the job done!” (EPA-HQ-OAR-2009-0923-1686-1)

Comment:

“Recent events indicated we can not trust either BP or the people who are supposed to enforce the safety and environmental standars. It is not to big a stretch to believe this is indicative of the entire drilling industry.

One of the benefits of stricter supervision and tighter emission standards is the fact that more expensive oil will lead to other types of fuel being more prevalent and the use of renewable types of energy instead of oil” (EPA-HQ-OAR-2009-0923-1687-1)

Comment:

“The oil companies need to be responsible for all damages, no limit on costs. Especially if it is found that they cut corners on safety or used risky or not state of the art drilling practices, the CEO's and upper management should be tried in criminal court and subject to prison sentences. All deep water drilling should be stopped permanently” (EPA-HQ-OAR-2009-0923-1688-1)

Comment:

“I would also suggest giving EPA joint jurisdiction with MMS (Interior) to monitor/inspect spill prevention technologies on all off-shore drilling rigs. Obviously, MMS has been incapable of conducting a proper inspection regime or regulating the industry properly. Moreover, the EPA has a vital regulatory role to play here since the environmental consequences of spills can be catastrophic.” (EPA-HQ-OAR-2009-0923-1689-1)

Comment:

“This is outrageous what is happening in the Gulf. I pray that our God will be a just and merciful God because mercy will be needed come judgment day” (EPA-HQ-OAR-2009-0923-1690-1)

Comment:

“If anything has been made all too clear in recent years, it is that big capitalist companies don't give about the Earth, you, me, or any other living thing than themselves. Therefore thorough

regulation is a Must. Regulate More, not less, than you planned--in the name of Life!" (EPA-HQ-OAR-2009-0923-1691-1)

Comment:

"It is not very hard to see that petroleum has taken away the imagination of the American people. If I can have my car, and I can speed down the Interstate at breakneck speeds, then what do I care if the whole world goes to hell? This kind of thinking should not and need not be reinforced by BP or Exxon or anyone else. I propose raising the price of fuel to 10 dollars a gallon. This way, the petroleum companies can have their way, and the people of the world can gradually use their God-given intelligence to comprehend and to put-in-place more environmentally responsible ways for subsistence" (EPA-HQ-OAR-2009-0923-1692-1)

Comment:

"Please, for once, protect the public interest and natural resources over corporation profits" (EPA-HQ-OAR-2009-0923-1693-1)

Comment:

"Further, it is essential that the industry be monitored and that the extent and causes of spills, leaks, and discharges of pollutants be independently verified by the government and outside experts and scientists. I've just spend part of my holiday reading and watching interviews about the oil spill. The more I read and hear the more I'm outraged by BP's stonewalling, trying to keep reporters out, refusing access to the site of the spill, and not letting clean-up workers wear masks etc etc etc etc.

We have to learn from this disaster, not to say catastrophe. The Gulf of Mexico does not belong to BP or any corporation. It belongs to the whole world, but it's close to the US, so we have a responsibility to not befoul the world's oceans" (EPA-HQ-OAR-2009-0923-1694-1)

Comment:

"I am sickened and greatly angered at the ongoing, massive environmental damage going on in the Gulf of Mexico. Once again, a large, extremely wealthy corporation has taken huge risks, has created huge damage to America's economy, and continues to lie to avoid taking any financial responsibility.

Leading up to this mega-disaster, BP has spent enormous sums of money to buy special treatment from the American Government so they will not have to take responsibility for the unnecessary risks they take every day with the environment that supports so many livelihoods.

Now is the time to stand up for Americans against corporate greed” (EPA-HQ-OAR-2009-0923-1695-1)

Comment:

“The oil and gas industry must be held accountable. It is though negligence and greed that this disaster happened” (EPA-HQ-OAR-2009-0923-1696-1)

Comment:

“The mistake in the Gulf is going to uncover a world of errors and omissions and I don't mean that literally but it will do that also. Make our planet safe, demand corporate responsibility from the huge oil companies. The damage will not soon be undone” (EPA-HQ-OAR-2009-0923-1697-1)

Comment:

“Further, please make this system as rigorous as possible, with clear, articulate guidelines and severe, costly penalties.

The oil industry is certainly powerful, but it is not just. It is our job to make things just, for all people and the health and great wealth of our future.

Greenhouse gas emissions are one of the most urgent and critical environmental matters in the world, and the consequences of failed policies will be, according to all good science, catastrophic for lifecosystems and human welfare.” (EPA-HQ-OAR-2009-0923-1698-1)

Comment:

“It is exhausting when the agencies exactly created to regulate private interests and prevent transgressions are not either effective or empowered. People have to become that regulatory voice Over and Over. This should be routine and would be if corruption were not at play!” (EPA-HQ-OAR-2009-0923-1699-1)

Comment:

“Please end the stranglehold of U.S. energy policy by environmentally devastating and life-destroying filthy fossil fuels and promote clean, renewable, safe and ethical energy for the protection of health and life on planet Earth” (EPA-HQ-OAR-2009-0923-1700-1)

Comment:

“We have turned a blind eye on these issues for FAR too long. We will not survive if we do not make changes...Quickly!!! Time to put life before money” (EPA-HQ-OAR-2009-0923-1701-1)

Comment:

“The BP disaster is epic, controls on the oil companies has been woefully inadequate. Strict, enforced regulations is the only way to prevent it from happening again” (EPA-HQ-OAR-2009-0923-1702-1)

Comment:

“YES YES YES...they don't need breaks. They need to follow strict rules and pay every penny to be allowed to drill. PERIOD. We must stop allowing our government to be run by high-paid lobbyists” (EPA-HQ-OAR-2009-0923-1703-1)

Comment:

“To put the size of this "spill" in perspective: right now it covers an area about the size of a 5-hour drive from Lake Tahoe to several miles out into the Pacific off Marin and is as wide as the distance from Stockton to Chico. And that's just what can be detected by satellite. Who knows what it looks like a mile below sea level?

It is obvious that BP has been using diversion, lies, and bribery of regulatory officials this past month, all the while sea life is dying, wetlands are polluted, and livelihoods depending upon the Gulf are destroyed. On top of this, they simultaneously have an oil containment problem in Alaska.

Let BP use its \$5B in profits so far this year to clean up the Gulf, pay for all damages, and fine them for their corruption, coverups, and withholding of vital information from scientists and government agencies. They should have all drilling rights revoked and its top officials brought to court” (EPA-HQ-OAR-2009-0923-1704-1)

Comment:

“Is clean water important to life on planet earth ? is clean air ? Why are we playing roulette with the earth's thermostat ? Both the oil and Natural gas industries have proven that they need significant drilling regulations as well as the mandatory green house gas reporting rule” (EPA-HQ-OAR-2009-0923-1705-1)

Comment:

“WE MUST NOT LET THOSE WITH POWER DESTROY THE LIVES OF THOSE WITHOUT” (EPA-HQ-OAR-2009-0923-1706-1)

Comment:

“Planet Earth is at risk and EPA knows this at least some folks there know this. No energy producing company working with hydrocarbons should be exempt from clean air and clean water standards and legislation or greenhouse gas reporting. I am presently reading Storms of My Grandchildren by James Hansen. It is truly alarming that the science has been around now for a long time and politically we do not seem to be able to make progress! What is the matter with human beings if they cannot act when life, all life, on Planet Earth is threatened! Please, you are in a position to do something that will make a difference. Your destiny is calling you! YES, YOU.” (EPA-HQ-OAR-2009-0923-1707-1)

Comment:

“NO INDUSTRY SHOULD BE EXEMPTED FROM TAKING CARE OF THE AIR WE ALL BREATHE AND THE WATERS THAT WE ALL DEPEND ON!! NOTHING IS MORE SACRED THAN OUR PLANET. AND EVERY SINGLE PERSON AND CORPORATION NEEDS TO BE RESPONSIBLE AND ACCOUNTABLE” (EPA-HQ-OAR-2009-0923-1708-1)

Comment:

“I live in the affected region of the Gulf, and I can tell you now that everyone here is demanding not just the one leaking, but ALL of these rigs be shut down permanently before another disaster happens!” (EPA-HQ-OAR-2009-0923-1709-1)

Comment:

“I am fed up with the international corporations leading our government around by the nose. The EPA must take action now to control their out-of-control pillage of our oceans and wetlands” (EPA-HQ-OAR-2009-0923-1710-1)

Comment:

“Please let's use real science in our EPA and rigorously enforce the laws and regulations that we have.” (EPA-HQ-OAR-2009-0923-1711-1)

Comment:

“Please put the american people and the environment in front of the corporate interests and hold BP accountable” (EPA-HQ-OAR-2009-0923-1712-1)

Comment:

“Please, can you not act like mature adults and quit doing everything for money and profit? You want need any money if you spoil this earth with horrible pollution. Think of the planet and the future, not just big fat wallets” (EPA-HQ-OAR-2009-0923-1713-1)

Comment:

“Any more offshore drillings should really be thought out and vigorous checks in regulations be enforced. We don't need anymore disasters” (EPA-HQ-OAR-2009-0923-1714-1)

Comment:

“Thank you for considering my comments on this important issue” (EPA-HQ-OAR-2009-0923-1715-1)

Comment:

“For The sake of humanity and all that is right, do not let the big corporations, which already control much of our economy and the world get away with not reporting their emissions” (EPA-HQ-OAR-2009-0923-1716-1)

Comment:

“Help reverse public cynicism about the way our government has failed to require accountability from "big oil" in the past” (EPA-HQ-OAR-2009-0923-1717-1)

Comment:

“carefully.Please watch and monitor the oil companies. They simply cannot be trusted. No more ocean drilling--EVER!!!” (EPA-HQ-OAR-2009-0923-1718-1)

Comment:

“We need to take a stand. Corporate interests are ruining our country” (EPA-HQ-OAR-2009-0923-1719-1)

Comment:

“The days of "trust us; we don't need your oversight" are OVER!” (EPA-HQ-OAR-2009-0923-1720-1)

Comment:

“Thanks you for ensuring the safety of our onshore and offshore resources” (EPA-HQ-OAR-2009-0923-1721-1)

Comment:

“We have seen what can happen without rigorous enforcement of the existing oversights. Do we want to have it continue happening. I know I don't” (EPA-HQ-OAR-2009-0923-1723-1)

Comment:

“Come on you guys. Let's get with it and have some accountable from this heretofore sacred industry” (EPA-HQ-OAR-2009-0923-1724-1)

Comment:

“Please, for the sake of my 1 year old grandson and all the other children who iwll be growing up in the next years, let's push for cleaner energy without the pollution. Please make the on and off shore activities of big oil reportable and accounted for. Do everything you can to accomplish this to reduce pollution.SAND FIRM, ON THESE ISSUES.Thanks you very much for all of us who care” (EPA-HQ-OAR-2009-0923-1725-1)

Comment:

“It has been truly heart-breaking to watch what seems likely to be the slow death of the Gulf Mexico, at a cost of human livelihoods and precious marine habitats and species -- all because assurances that devices were fail-safe, and emergency measures were prepared in advance, turned out to be tragically untrue” (EPA-HQ-OAR-2009-0923-1726-1)

Comment:

“We should also take the difficult step of using the tax code to make the true "common good" costs of energy more apparent (as in Europe), so that conservation and reducing fuel use become more attractive options. I urge the Obama administration to take assertive leadership to make this crucial change happen” (EPA-HQ-OAR-2009-0923-1726-2)

Comment:

“This is only a start on what must be done, but we need to make this start, and a lot of others. Thank you very much for doing whatever you can to rein in the completely unacceptable behavior of this industry. Our planet does not deserve this.” (EPA-HQ-OAR-2009-0923-1727-1)

Comment:

“It is beyond belief that the greatest environmental damage to this country from an oil spill not result in the maximum regulation of the oil industry. Everything that will aid this effort including reporting of greenhouse gas emissions must be included. This action is clear and obvious.” (EPA-HQ-OAR-2009-0923-1729-1)

Comment:

“The oil and gas industry has shown that, left to its own devices, it will proceed to put profits over the health and safety of its own employees and that of the environment. The ENVIRONMENTAL PROTECTION Agency should live up to its name and protect the environment!” (EPA-HQ-OAR-2009-0923-1730-1)

Comment:

“What is the real cost of it all?

We should be willing to pay the real price of the energy we use. That includes the environmental costs. The cost in blood and treasure defending the sources of that energy. Health costs? The depletion of our natural resources.

We cannot keep kicking the can down the road” (EPA-HQ-OAR-2009-0923-1731-1)

Comment:

“I know this is a "canned message." But it says exactly what I would like to say. It appears that the industry feels that is above the law. It should not be.” (EPA-HQ-OAR-2009-0923-1732-1)

Comment:

“Better yet, set them all on a course to produce solar collectors so we can all switch to solar powered cars and homes, and end the use of this unbelievably stupid form of energy. Anyone whose greed has not clogged their brain should be able to come up with a method for this procedure” (EPA-HQ-OAR-2009-0923-1733-1)

Comment:

“If we have learned anything watching the BP disaster unfolding in the Gulf, it's that the oil and gas industry obviously doesn't comprehend the potential environmental impact of their activities. They obviously will avoid taking precautions to prevent damage to the environment if they impact profits” (EPA-HQ-OAR-2009-0923-1734-1)

Comment:

“BP MUST BE 100% ACCOUNTABLE FOR THIS GUSHER (NOT A SPILL).

NOT ONLY DO WE NEED ALL THE INFORMATION BUT WE NEED TO HOLD THEM TO THEIR PROMISE THAT THEY WILL MAKE IT ALL RIGHT.

FIND OUT THE TIES BETWEEN V.P. CHENEY AND BP. WHAT WENT ON IN THOSE CLOSED DOOR MEETINGS? IF I HARM ONE MIGRATORY BIRD THE PENALTIES ARE 5 MONTHS AND \$5000 MAX. THEY HAVE HARMED THOUSANDS IF NOT MILLIONS.

THEY SHOULD BE FINED FOR EACH BIRD THAT DIES” (EPA-HQ-OAR-2009-0923-1735-1)

Comment:

“If we don't do something about the oil industry they will be the downfall of this planet. We need to act responsibly and we need to do so NOW. Otherwise there will be no children in the future of this world. At the rate we are going down hill there will be no 22nd century. We can not expect our children to have to clean up our messes or mistakes” (EPA-HQ-OAR-2009-0923-1736-1)

Comment:

“It's outrageous that oil companies are in a position to make huge profits and at the same time they're excused from the responsibility of cleaning up their own messes.” (EPA-HQ-OAR-2009-0923-1737-1)

Comment:

“All these affect the health and welfare of the American public and we need to be informed and our leadership accountable for strong and proper supervision and monitoring and keeping the public informed of all violators and fines or penalties and worst offenders or those who get out

through legal maneuvering or loopholes and technicalities. We want safety and accountability not legal games that put the public at risk or individuals and communities at risk for illness and contamination of food, air, and water resources nor economic resources that support families by industry or industry practices that exploit all of us and their workers in high risk and high disaster potential pursuits like oil and gas drilling and coal and oil shale extraction processes. We have had enough. Import what we use or require reduced use and alternative energy sources and support homesite energy generation through solar or small roof top wind turbines and efficient vehicles” (EPA-HQ-OAR-2009-0923-1741-1)

Comment:

“If the oil companies do not follow the rules, we should close them down or take over the operations of them. This is the worst disaster in our history and we will not know for years how badly our country is going to suffer. Big Oil HAS TO LEARN THEY CAN NOT GET AWAY WITH THIS” (EPA-HQ-OAR-2009-0923-1742-1)

Comment:

“JAIL BP & HALLIBURTON EXECUTIVES. JAIL MINERALS "MANAGEMENT" SERVICE REGULATORS. IN CHINA THEY WOULD ALL BE EXECUTED!!” (EPA-HQ-OAR-2009-0923-1743-1)

Comment:

“Last year, the oil and gas industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions” (EPA-HQ-OAR-2009-0923-1744-1)

Comment:

“With the catastrophic events occurring right now in the gulf, we are more certain than ever that BP, and all of the big oil companies, must be held accountable for its actions, and lack of actions” (EPA-HQ-OAR-2009-0923-1745-1)

Comment:

“Please, we are counting on you!” (EPA-HQ-OAR-2009-0923-1745-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be stopped!. Oil is an archaic industry which should have gone the way of the dinosaur fifty years ago” (EPA-HQ-OAR-2009-0923-1747-1)

Comment:

“It is time to replace oil, coal, and nuclear with energy sources that do not destroy ourselves and our earth” (EPA-HQ-OAR-2009-0923-1747-2)

Comment:

“As in any industry or service, the only way to make it work is with real accountability” (EPA-HQ-OAR-2009-0923-1749-1)

Comment:

“It is outrageous that environmental disasters like this one seem to be occurring with some regularity now. We only have one earth, and it is there for all the world to enjoy and benefit from. The land animals and sea animals also live on this earth. It is our responsibility, as humans who have more power than other creatures, to safeguard our environment. These oil and gas companies have done so much damage on a large scale. They must be monitored and held accountable for their activities” (EPA-HQ-OAR-2009-0923-1750-1)

Comment:

“Just as important, it is imperative that industry have safeguards in place before constructing these potentially hazardous methods of extraction from our planet. Perhaps it's time for the government to step in and offer up solutions that embrace natural solutions vs. unnatural pollutions. Check out "Biomimicry"! ” (EPA-HQ-OAR-2009-0923-1751-1)

Comment:

“Thank you for your part in stopping the corruption in our nation's ability to oversee industries that MUST be held accountable for their business practices” (EPA-HQ-OAR-2009-0923-1752-1)

Comment:

“Much has been said about this current oil spill, and the talk will continue for the next decade. The EPA needs to remember what its primary function is: protection of the environment.” (EPA-HQ-OAR-2009-0923-1753-1)

Comment:

“Off shore drilling should be stopped and not allowed in the future. Neither should our nature preserves be touched. We need to use more green sources such as solar, wind, geothermal. etc. Also no nuclear energy without better containment” (EPA-HQ-OAR-2009-0923-1754-1)

Comment:

“DO THIS FOR ALL LIVING CREATURES” (EPA-HQ-OAR-2009-0923-1755-1)

Comment:

“We are heartsick at the devastation in the Gulf. I believe the damages will be with us forever. Let us have no more off shore drilling” (EPA-HQ-OAR-2009-0923-1756-1)

Comment:

“Take this latest oil disaster as the final wakeup call and do the necessary. Our nation and the world is looking at us to be a leader and yet, once again, we show no more gumption and strength than a third rate, third world country in protecting our people, our lands, our resources and our legacy” (EPA-HQ-OAR-2009-0923-1757-1)

Comment:

“It is now time for America to learn from the mistakes of BP and all of the Oil Industries about how dangerous and harmful that the fossil fuel Oil is to not only the ocean, but the air and the health of us and the planet we all share. Please do the right thing and make them accountable for the devastation they are causing to our planet, let us end this dependency on oil now.” (EPA-HQ-OAR-2009-0923-1758-1)

Comment:

“It's time to make them follow the rules and not buy their way out! Please stop letting them buy their way out of being accountable for their actions!

Sick and tired of picking up the tab for big business!” (EPA-HQ-OAR-2009-0923-1759-1)

Comment:

“At my last check-up, my blood pressure was 90/60. Fantastic, right? (Especially since my cholesterol has "dropped" to 245.)

However, my bp raises dramatically whenever I see a story on BP. I have been boycotting BP for 3 years now, after they wanted to dump in the Great Lakes. They have shown their true colors. Again” (EPA-HQ-OAR-2009-0923-1760-1)

Comment:

“The future of our planet is at stake. We must make sure that we give our children and grandchildren a clean and safe world” (EPA-HQ-OAR-2009-0923-1761-1)

Comment:

“No exemptions. No exceptions. Let's get it right” (EPA-HQ-OAR-2009-0923-1762-1)

Comment:

“Spills in Ecuador and off the Alberta Coast indicate that something must be done.” (EPA-HQ-OAR-2009-0923-1763-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1764-1)

Comment:

“I realize BP can't say "it's bad, really bad and we don't know what to do". But they don't have to lie, as spokespeople are doing.

The fact that BP wasn't required to have plans and equipment in place in case of a (in this case, preventable) catastrophic accident only points to the necessity to have the gas and oil companies under the EPA” (EPA-HQ-OAR-2009-0923-1765-1)

Comment:

“Without the full data from full reporting, we will be condemned to fail in our efforts to avert climate disaster. If we cannot know with a high degree of confidence, the true costs of our dependence on oil, coal, and other conventional fuels, we will not be able to calculate the viability of alternatives. Please move forward and make the oil and gas industry the cooperating, accountable partner in pursuit of our national interests” (EPA-HQ-OAR-2009-0923-1766-1)

Comment:

“Lets not let the nations worst environmental disaster go un-noticed in policy. We must make the correct choices so this can never happen again” (EPA-HQ-OAR-2009-0923-1767-1)

Comment:

“(SFI)---- DO THIS NOW!!!! WE ARE ALREADY WELL INTO THE "SIXTH GLOBAL MASS EXTINCTION EVENT"!!!!!! WE NEED TO PUNISH THE ONES WHO WERE STUPID ENOUGH, AND ARROGANT ENOUGH, NOT TO HAVE ADEQUATE ALTERNATE BACK-UP PLANS IN CASE THIS HAPPENED!!!!!!!!!! IT'S IMPOSSIBLY STUPID!!!!!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-1768-1)

Comment:

“The grim spectacle of the BP disaster unfolding in the Gulf, bringing us to our knees and destroying our water, should teach us that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1769-1)

Comment:

“BP and the rest of the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-1770-1)

Comment:

“I am fed up with the international corporations leading our government around by the nose. The EPA must take action now to control their out-of-control pillage of our oceans and wetlands” (EPA-HQ-OAR-2009-0923-1770-2)

Comment:

“Please let's use real science in our EPA and rigorously enforce the laws and regulations that we have” (EPA-HQ-OAR-2009-0923-1771-1)

Comment:

“For my part, I am cutting down on my personal gas and oil consumption as a commitment to what I believe is irresponsible use of natural resources by BP. Although I will do what I can, we rely on the EPA to provide the systematic structure to hold oil and gas companies responsible.

Together we can provide a better future to our children's children” (EPA-HQ-OAR-2009-0923-1772-1)

Comment:

“The lobbyists have influenced too many important decisions. It is time to exercise integrity and justice in all EPA regulatory decisions” (EPA-HQ-OAR-2009-0923-1773-1)

Comment:

“We should know now better than ever that the oil and gas industry must be held accountable for their actions” (EPA-HQ-OAR-2009-0923-1774-1)

Comment:

“Thank you for your time and for your consideration of this important matter” (EPA-HQ-OAR-2009-0923-1774-2)

Comment:

“Don't let big oil and gas off the hook. The damage both industries have done to the environment cannot be undone in our lifetime. Both have destroyed untold amounts of water, fish, and other parts of our environment. Both have sacrificed lives for profit. And both are still polluting our air. Please hold them accountable.” (EPA-HQ-OAR-2009-0923-1776-1)

Comment:

“It's time the EPA takes the public into consideration above that of corporations that have up to now have had the ear of the EPA” (EPA-HQ-OAR-2009-0923-1777-1)

Comment:

“I have lived around the petrochemical industry all my life. Its an inherently dirty business. Incidents similar to the BP spill in the Gulf will continue to happen. Its not a matter if if but when and where. We should do every thing possible to minimize the detrimental effects” (EPA-HQ-OAR-2009-0923-1778-1)

Comment:

“I hope EPA will continue to exert its authority to protect our planet” (EPA-HQ-OAR-2009-0923-1779-1)

Comment:

“Can we use the common sense we were given? These last several weeks have been disastrous and we know now that it's only the beginning of one of the worst environmental disasters in American history” (EPA-HQ-OAR-2009-0923-1780-1)

Comment:

“Let's not drill anymore. Our environment is too precious, as we have found out in the BP disaster in the Gulf. Let's have more hybrid and electric cars. We drive a hybrid, and it is an excellent vehicle” (EPA-HQ-OAR-2009-0923-1781-1)

Comment:

“I realize the oil and gas industries are extremely powerful, but you DO have the power to begin to reign in their stranglehold” (EPA-HQ-OAR-2009-0923-1782-1)

Comment:

“Additionally, I would like to end our consumption of fossil fuels entirely. Let's invest in this new Earth that we have created. The disasters that are increasingly coming our way do not bode well for us. We need to get off the grid as a matter of not only national security, but as a way to maintain life” (EPA-HQ-OAR-2009-0923-1783-1)

Comment:

“Oil and gas companies have gotten away with too much for too long” (EPA-HQ-OAR-2009-0923-1784-1)

Comment:

“Also, legislte away the 1851 (?) law allowing oil co.'s to hide or limit liability t apprx. \$21 million. finally, hasn't Saudi Arabia eliminated past oil spills by enlisting GIANT TANKERS TO SUCK UP THE SPILLAGE?!

Earn your salary” (EPA-HQ-OAR-2009-0923-1785-1)

Comment:

“Mandatory reporting of onshore and offshore oil drilling GHG for the oil industry is essential for America to set a baseline and know what our emissions are. Every business in America should be held to the same rules” (EPA-HQ-OAR-2009-0923-1795-1)

Comment:

“If regulation of greenhouse gases is to be effective at all, we need to monitor every relevant industry” (EPA-HQ-OAR-2009-0923-1796-1)

Comment:

“WHY IS THE ADMINISTRATION NOT EVEN TALKING ABOUT CONSERVATION? It is time to initiate criminal proceedings again BP for not having provided for the worst case scenario that has resulted from their attempt at exploitation of oil deposits more than two miles below the surface of the Gulf of Mexico and to permanently "hold" future drilling leases and procedures” (EPA-HQ-OAR-2009-0923-1798-1)

Comment:

“Enough is enough. We can NEVER replace all the dead and dying birds and other creatures caused by this disaster. Please!!!! Let's not let it happen again” (EPA-HQ-OAR-2009-0923-1799-1)

Comment:

“It was said, and not all that long ago, that this sort of tragedy couldn't happen. Well, it has. Now we must make sure that it cannot happen again.” (EPA-HQ-OAR-2009-0923-1800-1)

Comment:

“I also encourage you to use the Environmental Protection Agency as a position to stand up for the idea that economy, efficiency, low prices and cheap fuel are not the only things Americans value that there are more important aspects to life in America, and on this earth, than mthe bottom line.” (EPA-HQ-OAR-2009-0923-1801-1)

Comment:

“I pray the Senate and House will increase the liability of oil companies for disasters such as this, but I am sickened by what is happening and will continue to happen to our beautiful wetlands and wildlife in the Gulf. Please continue to be the protector of our environment. Thank you.” (EPA-HQ-OAR-2009-0923-1802-1)

Comment:

“Do people not realize how important it is to take care of our world. Making money seems to be the top priority. When we totally ruin OUR PLANET are we going to use money to feed people. I don't think that it will be very tasty or nutritious.” (EPA-HQ-OAR-2009-0923-1803-1)

Comment:

“What will it take to wake up our government agencies, a disaster the magnitude of 911 but in the environmental arena only? If the Gulf Oil disaster isn't a creeping 911 disaster in the making, I certainly wouldn't want to know what is!” (EPA-HQ-OAR-2009-0923-1806-1)

Comment:

“Send a message to BP and boycott their stations! Just found out that the oil they drill off our coast goes into a big pot and divided up by bidding from other countries. So we may only be getting a small amount and paying a huge price as evidenced by this huge disaster in the Gulf. which may not ever be the same .” (EPA-HQ-OAR-2009-0923-1807-1)

Comment:

“We cannot go on as we have been, selling out the environment and the futures of our next generations for our outlandish appetite for more and more energy - most of it dirty when it needn't be. We need to reduce wasteful use of energy while we find cleaner methods for what we must have. It means a shift in paradigm about what we think we need (we are at the top of the most wasteful countries in use of resources) and a search for cleaner methods. Our strong creative spirit and entrepreneurial energy can be best used to reorganize our cities and transportation processes to use less!” (EPA-HQ-OAR-2009-0923-1808-1)

Comment:

“As President of Grassroots Coalition, my organization has been involved with oil and gas field operations for at least the past 15 years. During this time frame, we have encountered and continue to encounter so many people that fully believe that they and their families, livestock and pets have been harmed by the toxic oil and gas constituents that migrate off the oil and gas field operations. It is past time for the public -wildlife and the environment to be safe from the toxic emissions. It is past time for seriously considering, measuring and stopping the emissions. The fact that there are no state or federal agency regulations for testing etc.- to protect the public and the environment from MIGRATING oil and gas field operations gas/oil is outrageous and must change.” (EPA-HQ-OAR-2009-0923-1809-1)

Comment:

“I am truly disgusted with the lack of supervision of the fossil fuel industry. I don't think there should be any off shore drilling, period. BP profit's are in the billions of dollars yet they could not take the time and effort to assure that such a spill could and would not happen. Now that it has happened where is their back up solution? They obviously have none. It is good to hear that the EPA is now proposing to "set things right" after the horse has left the stable! The EPA is responsible for setting strict standards on all industries that affect our environment whether it be air pollution, mining, oil drilling, or the timber industry.I am so furious that I can barely write at this time. Please help us to turn the greedy corporation practices around that have wrecked so many lives, industries, and our planet.” (EPA-HQ-OAR-2009-0923-1810-1)

Comment:

“The days of government complicity in the creation of relaxed legal requirements allowing big business to conduct operations without proper msafeguards in place MUST END. I refer of course primarily to the previous administration, and the incredible corruption that still goes on between government and big business in the form of lobbying and so forth, greasing palms to make things easier as far as the circumventing of safety requirements and so forth is concerned. It is abundantly clear that it is precisely this corruption (legal or not) that has given rise to the lax conditions that caused the present epic disaster, which could easily happen again unless this situation is resolved. It is now the responsibility of the present administration to bring that about. Hold them fully accountable, assure all sufficient safeguards and technologies are in place and effective, etc. And any oil industry resistance to this be damned!” (EPA-HQ-OAR-2009-0923-1812-1)

Comment:

“The EPA must respond to protect us from further tragedies like this. Closing this loophole will provide market incentive to oil companies to shape up their act. Please act upon this.” (EPA-HQ-OAR-2009-0923-1813-1)

Comment:

“(SFI) DO THIS NOW!!!! WE ARE ALREADY WELL INTO THE "SIXTH GLOBAL MASS EXTINCTION EVENT"!!!! WE NEED TO PUNISH THE ONES WHO WERE STUPID ENOUGH, AND ARROGANT ENOUGH, NOT TO HAVE ADEQUATEALTERNATE BACK-UP PLANS IN CASE THIS HAPPENED!!!!!! IT'S IMPOSSIBLY STUPID!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-1814-1)

Comment:

“The impacts from an oil well gone wild are now horribly clear and sadly horrifically wide spread. The US government can permit but must condition permits so that the recipient is held fully accountable for mistakes and for the extensive disruptions to our global ecosystem. The US government must not take on this responsibility as it did with the super fund to clean up toxic waste sites. Instead, it must demand that a permittee extract cleanly and be held accountable if they cannot.” (EPA-HQ-OAR-2009-0923-1817-1)

Comment:

“They are putting forth one possible method to stop the current on going disaster. Then spend time exposing how are they assembling the parts, and getting everything together. When the method fails, they restart the process. They should have several teams doing the preliminary work for several proposed methods in parallel to shorten the time line. This shows their disdain for the earth and the the health of the earth's biosphere! Their only concern is getting more money” (EPA-HQ-OAR-2009-0923-1818-1)

Comment:

“Please, no more favors for big oil companies, or big corporations at all for that matter. They are ruining our country!! Our economy, our oil, and it seems like the only recourse we have are these little letters. Not much hope here, but you have to try.” (EPA-HQ-OAR-2009-0923-1821-1)

Comment:

“The emerging story from the Gulf of Mexico is showing a pattern of an accident that could have been avoided, if BP wasn't so concerned with cutting corners and adding, thereby, to their bottom line. The evidence is clear from this and other oil industry "accidents" they are in need of more regulation, not less. Again I urge you to make the oil industry comply with direct pollution measurements.” (EPA-HQ-OAR-2009-0923-1822-1)

Comment:

“One of our most important hallmarks of our democracy is the adage, 'you are responsible for your actions.' This is our seminal statement of our system of justice. Not to support this is to say our democracy is not important to you, that our society, and our country are not important to you. Stop playing at politics and do what's right!” (EPA-HQ-OAR-2009-0923-1823-1)

Comment:

“The oil and gas industry needs clear and strong rules on pollution emissions. Rules and regulations should be formulated to help point the industry - and this whole country - in the direction of reducing pollution, both from greenhouse gases and other forms of pollution.” (EPA-HQ-OAR-2009-0923-1824-1)

Comment:

“Let's not forget that these natural resources belong to the American people, not BP or "Big Oil" or their lobbyists. BP can not be allowed to continue to profit from their sloppy, dirty work. There is no way of knowing the final cost of this ongoing spill into the gulf since it will take many years, possibly generations, to assess the damage and toll taken on the wildlife, the land and the ocean. And though as much as 40 million gallons of oil have leaked into the environment to date, BP will continue to reap profits if it is not held financially and morally accountable now and for as many years as necessary.” (EPA-HQ-OAR-2009-0923-1825-1)

Comment:

“We've just had another lesson to corroborate the wealth of evidence that the corporate world is not looking out for the public interest -after all, they have a legal obligation to serve their shareholders(and executives have a burning desire to serve themselves first).” (EPA-HQ-OAR-2009-0923-1826-1)

Comment:

“Enough already!!!! Stop ruining our resources and our economy!!!!!!” (EPA-HQ-OAR-2009-0923-1828-1)

Comment:

“The Deep water Horizon Blowout in the Gulf of Mexico has shown just how willing and eager the oil and gas industry is to under report its pollution when it even bothers to report pollution at all. Gallons or barrels released per minute doesn't even begin to start to account for the air pollution and carbon load additions from direction natural gas releases that bubble into the air or for gas hydrates for long term release into the ocean or air and yet have grossly under reported the direct water pollution and BP in its response plan submitted to MMS had no plans but identified the problems that would be created, which showed bad faith in my opinion. How can anything that identifies nor real timely response but only problems be substituted for a response plan?

As an oil major, BP has shown the oil industry is not worthy of the trust it had been given. It

needs to be held to closer account, as your proposed rule begins to do.” (EPA-HQ-OAR-2009-0923-1829-1)

Comment:

“Any more offshore drillings should really be thought out and vigorous checks in regulations be enforced. We don't need anymore disasters.” (EPA-HQ-OAR-2009-0923-1830-1)

Comment:

“We do need governmental controls over so many factions of our lives. Please know that I support active safeguards which only our leaders can impose. Please show strength in making sure action is taken here.” (EPA-HQ-OAR-2009-0923-1831-1)

Comment:

“It's time to start prosecuting the oil executives and all the politicians who are on their take.” (EPA-HQ-OAR-2009-0923-1833-1)

Comment:

“It is an outrage that BP did not have disaster control plans already available to control a catastrophe such as now befalls the Gulf. The powers that be need to take action to halt irresponsible drilling and mining of our country's natural resources. Not only are such activities detrimental to our ecology, but they are also detrimental to our economy.” (EPA-HQ-OAR-2009-0923-1834-1)

Comment:

“From a May news article, I read "The administration wants to increase from \$1 billion to \$1.5 billion the amount that could be spent from an emergency cleanup fund paid with industry fees, and raise a \$75 million liability limit BP would bear for costs not directly connected to cleaning up the spill, such as lost wages and tourism.”

I hope your office is also keeping track of the economic devastation visited upon the Gulf Coast. \$75 million is not going to compensate the nation for what has happened. ” (EPA-HQ-OAR-2009-0923-1835-1)

Comment:

“We are currently witnessing, before our very eyes, the very real cost to the environment from the oil and gas industry - THEY MUST BE HELD ACCOUNTABLE, and provide accurate and comprehensive data about the environmental costs of their industry.” (EPA-HQ-OAR-2009-0923-1836-2)

Comment:

“I am sick and tired of watching the petrochemical industry have free access to public lands and seas and despoiling them at the cost of taxpayers. Superfund cleanups, toxification of our lands and restricted public access are just some of the inequitable practices to which extraction industry advocates have tethered our energy policy. If we wanted more corrupt government-oil industry policies, we would all be hollering for Dick Cheney to head the MMS. To grant more leases for offshore and onshore oil drilling only benefits a limited segment of our nation; it sure as hell isn't going to alleviate our dependence on oil by drilling in North American waters. It does keep oil executives rich along with the politicians that accept lobbyist dollars to secure their offices. As for drilling the sea floor at the astronomical pressures in deepwater exploration, I wouldn't even trust Bob Ballard and his expertise to work on the sea floor at those depths. It's patently absurd and equally as arrogant to believe we have adequate technology to circumvent disasters; we have more expertise getting to the moon so tell those jerks from BP, Shell, Exxon Mobile and the rest, to go drill on the damn moon and leave what remains of an intact biosphere to those of us who rely on it more than oil and money.” (EPA-HQ-OAR-2009-0923-1838-1)

Comment:

“I'm writing to support the disclosure requirements. Thank you for all your hard work towards reducing emissions. I'm literally praying that the Murkowski amendment fails in the Senate. (and making phone calls too!)” (EPA-HQ-OAR-2009-0923-1840-1)

Comment:

“For The sake of humanity and all that is right, do not let the big corporations, which already control much of our economy and the world get away with not reporting their emissions.” (EPA-HQ-OAR-2009-0923-1842-1)

Comment:

“Help reverse public cynicism about the way our government has failed to require accountability from "big oil" in the past.” (EPA-HQ-OAR-2009-0923-1843-1)

Comment:

“No longer can we ignore safety breaches we must keep our world safe for everyone. Thank you for being part of the solution.” (EPA-HQ-OAR-2009-0923-1844-1)

Comment:

“We've also learned they have a great habit of under estimating damages and telling the complete truth. They have even dified the government from knowing everything about their explorations/exploitations. If they have an agency charged with policing their activities, they just buy it. This has got to stop!” (EPA-HQ-OAR-2009-0923-1845-1)

Comment:

“As a US citizen currently living in New Zealand, I hope that the USA will provide some leadership with regards to emissions so that countries such as New Zealand can stop using the USA's lack of progress as an excuse to not make their own progress.” (EPA-HQ-OAR-2009-0923-1846-1)

Comment:

“It seems that BP is a habitual environmental law violator who never is held accountable. We have environmental reviews for a reason, do your job. I am a former high school environmental science teacher and believe the EPA and BP should both be held accountable for the worst environmental disaster to have ever occurred. Do not blame anyone else, send Bp officials to prison and block all their oil drilling permits.” (EPA-HQ-OAR-2009-0923-1848-1)

Comment:

“NO UNDERWATER DRILLING!!! THE OIL COMPANIES ARE TOO GREEDY AND STUPID TO BE ABLE/WILLING TO THINK OF ALL THE THINGS THAT COULD GO WRONG. WE'RE KILLING OUR ONLY PLANET.....” (EPA-HQ-OAR-2009-0923-1849-1)

Comment:

“It's obvious the oil companies cannot be trusted to do anything but try to deceive inspectors or even sacrifice the lives of their own workers to make more and more profits. The same holds true for coal companies. How long will we tolerate this criminal behavior.” (EPA-HQ-OAR-2009-0923-1851-1)

Comment:

“Our government has finally reversed our embarrassing position on global emissions management. Absolutely, all industry must fall inline.” (EPA-HQ-OAR-2009-0923-1852-1)

Comment:

“Please hold the Oil and Gas Industry, as well as, the other big businesses (domestic and abroad) accountable for their mistakes and misfortunes as far as the environment is concerned.” (EPA-HQ-OAR-2009-0923-1853-1)

Comment:

“It's high time that we stop letting big oil set the agenda and foul our environment.” (EPA-HQ-OAR-2009-0923-1854-1)

Comment:

“Let's get crazy and have wrong doers pay the penalty. Is this not what the GOP have been crying about for decades? RESPONSIBILITY?!?!?!?” (EPA-HQ-OAR-2009-0923-1855-1)

Comment:

“As a grandmother and a person of faith, I'm deeply troubled by the greed that seems to trump our responsibilities for stewardship. As an agency of our government, you are responsible for protecting the public welfare. There is no protection anywhere in our Constitution for corporate greed or the right to pillage our resources.” (EPA-HQ-OAR-2009-0923-1856-1)

Comment:

“PUBLIC ETHICS AND A SUSTAINABLE ENVIRONMENT REQUIRES REFEREES AND FAIR RULES, IN ORDER TO HAVE TEAMS WIN WITHOUT CHEATING OR RUINING THINGS FOR EVERYONE ELSE QUIT PRIVATIZING REGULATION! PUT IMPARTIAL REFEREES BACK IN THE GAME!” (EPA-HQ-OAR-2009-0923-1857-1)

Comment:

“For the sake of our planets future, at the very least, allowing all the truth to be public knowledge certainly is the way to go.” (EPA-HQ-OAR-2009-0923-1858-1)

Comment:

“Though this is a simple message, it will take some complex problem-solving skills. I urge you to give it your utmost attention to the problem of carbon emissions under-reporting so we can

avoid adding the ultimate catastrophe--a warming world--to the one with no Gulf of Mexico ecosystem.” (EPA-HQ-OAR-2009-0923-1859-1)

Comment:

“It's sickening to watch the events in the Gulf unfold and to see how large corporations control Congress to the detriment of our health, environment, and financial well-being. Yesterday was Memorial Day, more and more it seems that those who have fallen in defense of this country have done so in vain. It is time to make corporations accountable for their actions and to prosecute corporate noncompliance and criminal activity whenever and where ever it exists.” (EPA-HQ-OAR-2009-0923-1860-1)

Comment:

“BP, not the taxpayers of America, must be responsible for all capping and clean-up costs emanating from their oil spill. Please be sure the GAO keeps track of all costs and insists upon full reimbursement for all of those costs” (EPA-HQ-OAR-2009-0923-1861-1)

Comment:

“These guys are making billions of dollars PER QUARTER selling us fuel. nThere is no excuse for them to skimp on safety -- as BP did, with disastrous results -- or on pollution control.” (EPA-HQ-OAR-2009-0923-1862-1)

Comment:

“This tragedy is only the first of many to come if the EPA lets therules slide for oil companies. The well has not yet been capped and no one seems to know what to do. How many more warnings will we need before the earth is destroyed? Please PLEASE heed the warnings ...the EPA has no time to lose.” (EPA-HQ-OAR-2009-0923-1865-1)

Comment:

“We are the only species with the power to destroy or save our planet. Lets dot the right thing.” (EPA-HQ-OAR-2009-0923-1866-1)

Comment:

“I find it untenable and unsustainable that international oil corporations are not held to be publicly responsible for the damages they cause as they inch toward the "bottom line." Is there no common, human decency in the boardroom, no sense of capping the destruction we are

committing to our own home and mother. How can any man or woman set themselves up to be so pathologically arrogant? It is unacceptable. I admonish Big Oil to take care of their houses--or someone else will surely do it for you.” (EPA-HQ-OAR-2009-0923-1867-1)

Comment:

“CREATURES, ECOSYSTEMS, AND BEAUTIFUL ANIMALS LIKE WHALES, DOLPHINS AND TURTLES ARE DYING RIGHT NOW IN THE GULF OF MEXICO! PLEASE MAKE THE RIGHT DECISION SO THIS DISASTER NEVER EVER HAPPENS AGAIN!” (EPA-HQ-OAR-2009-0923-1868-1)

Comment:

“It's appalling that BP was given permission to drill without having a solution to "the worst case scenario"! Please, please, please don't let this ever happen again; we're counting on you.” (EPA-HQ-OAR-2009-0923-1870-1)

Comment:

“Denying environmental costs must become obsolete! Those who profit must pay and those who deny need awareness.” (EPA-HQ-OAR-2009-0923-1871-1)

Comment:

“We must protect people's livelihoods and all the wildlife than is affected by these terrible disasters.” (EPA-HQ-OAR-2009-0923-1872-1)

Comment:

“I am deeply concerned about the appalling lack of Federal regulations and oversight in lieu of this pollution disaster. I ask you to take the lead in seeing that we at least raise our safety standards to that of of smart neighbor to North.” (EPA-HQ-OAR-2009-0923-1873-1)

Comment:

“Please watch and monitor the oil companies. They simply cannot be trusted. No more ocean drilling--EVER!!!” (EPA-HQ-OAR-2009-0923-1874-1)

Comment:

“The tragedy unfolding in the Gulf of Mexico should be a huge wake-up call to reign in the oil and gas industry to keep it from despoiling the earth.” (EPA-HQ-OAR-2009-0923-1875-1)

Comment:

“Without careful tracking, an industry that has proven time and again that their bottom line and personnel paychecks are more important than worker safety or environmental safety will only get worse. These corporations need to be held accountable for what they do or don't do. Time and again we see that with a little extra money, tragedies could be avoided.

This industry should not and can not be exempted from the basic regulations other corporations must adhere to. When you think about the amount of greenhouse gases oil, gas and coal production produce in comparison to other industries it seems laughable that they were the ones granted the loop hole when they are the ones who by the nature of their industry will create the most.” (EPA-HQ-OAR-2009-0923-1877-1)

Comment:

“The potential damage to the Gulf ecosystem may last for centuries. This is unacceptable.” (EPA-HQ-OAR-2009-0923-1879-2)

Comment:

“There's a reason this sort of thing doesn't happen off the coast of South America and off the coast of other nations: The oil industry doesn't own those countries. They still have the ability to demand safety and make damn sure that if they spill they clean up. The fact that the oil industry's lobbyists can get just about anything they want makes me sick. I'm not in favor of capital punishment but these lobbyists and their corporate masters deserve to be tarred and feathered (with their own oil) and rode out of town on a rail. Or, failing that, be dropped off on the docks and marinas in Louisiana. They'd be lucky to escape with their lives. Enough is enough already.” (EPA-HQ-OAR-2009-0923-1880-1)

Comment:

“I sincerely hope that this disaster will be the last such disaster that affects the Gulf Coast. One way to accomplish this is to put offshore drilling under your jurisdiction” (EPA-HQ-OAR-2009-0923-1881-1)

Comment:

“I can not believe that there is any question in any sane persons mind after the terrible reality of the BP off shore oil drilling tragedy that this was forecast by every single human that is not in denial of the fact that accidents will happen. We an earth can no longer afford to put humanity at risk any longer. SHIT HAPPENS! I beg you to please stop putting us in the position where another "accident" can destroy more of our eco-system.” (EPA-HQ-OAR-2009-0923-1882-1)

Comment:

“It is inexcusable that with their billions of dollars of quarterly profits, they don't have a series of completely fool proof methods of capping any kind of leak, that can be put into place immediately. Their true colors are showing; this demonstration of incompetence shows total disregard for anything other than profits. Please use this disaster to get us off of oil completely, and jail those responsible, along with the kind of fines they will actually notice.” (EPA-HQ-OAR-2009-0923-1883-1)

Comment:

“The United States, the people residing in and near the US, and the animals in those habitats are irrevocably impacted by events such as the BP disaster. We have a moral and a legal responsibility, as citizens of the world to assure that such disasters do not happen and that when accidents occur the impacts are immediately, responsibly, justly and honorably mitigated. Better yet, accidents should be avoided.” (EPA-HQ-OAR-2009-0923-1884-2)

Comment:

“We need to take a stand. Corporate interests are ruining our country.” (EPA-HQ-OAR-2009-0923-1885-1)

Comment:

“At the expense of our oceans, land, and air, the oil and gas industry have been above the law far too long!” (EPA-HQ-OAR-2009-0923-1887-1)

Comment:

“Please ensure that the oil and gas industry is required to participate in the mandatory greenhouse gas reporting rule to track their pollution emissions, and hold them accountable not only when things like the BP disaster happen, but also before these problems arise.” (EPA-HQ-OAR-2009-0923-1888-1)

Comment:

“All industries MUST be HELD ACCOUNTABLE for their actions - whether it be destroying the environment or endangering people - no exceptions should be allowed. America and the world rely on the EPA to do their job to protect the environment, humans and animals for future generations. Please do this to the fullest extent of your ability and then some.” (EPA-HQ-OAR-2009-0923-1889-1)

Comment:

“It's obvious that with the oil companies it is all about profit. They could care less about the environment and we need to make them accountable for all of their pollution” (EPA-HQ-OAR-2009-0923-1890-1)

Comment:

“It is time for this Country and Congress to wake up and take responsibility for what it has allowed to happen to date” (EPA-HQ-OAR-2009-0923-1892-1)

Comment:

“It is long past time to stop the energy companies disregard for the pollution that they are causing, to ignore pollution abatement rules ,and holding government agencies and their employees hostage. Don't let these organizations continue to run roughshod over your agency.” (EPA-HQ-OAR-2009-0923-1894-1)

Comment:

“Unfortunately our leaders continue to be too slow to act. The time has come for heads to roll and companies (including Wall St.) made to comply with basic human concerns and needs... Other than GREED.” (EPA-HQ-OAR-2009-0923-1896-1)

Comment:

“The extraction of gas by drilling through Marcellus Shale is another nightmare. This fracturing destroys and contaminates the surrounding water supply. When are we ever going to get ahead of the polluters? A small town in Denmark invested in renewable energy and are now totally self-sufficient. They use solar and wind to run their cars and heat their homes. Why does America have to cow-tow to Big Oil, Gas etc. Why can't our government move to clean energy and create many jobs along the way. We have let China get the jump on us by making solar panels. When are we going to get our environment cleaned up and protected for the future?” (EPA-HQ-OAR-2009-0923-1897-1)

Comment:

“I dont know how anybody can watch the news on a daily basis and not be horrified by the sequence of events on the gulf. These things can only happen when my government turns a blind eye to consequences of putting corp. welfare above the welfare of this country and its people.” (EPA-HQ-OAR-2009-0923-1898-1)

Comment:

“I am amazed that our Political and Capitalist leaders refuse to learn from the destructive nature of fossil fuels. When are you going towake up and realize that we need Clean Energy and Green Job Creation? Look at the Oil disaster in the Gulf; Many oil disasters in Russia; The Exxon Valdez spill in Alaska; Out of control pollution of waste in our land fills and oceans; The destruction of many Mountain tops due to coal exploration and digging; and thousands of other historical ecological disasters.

When will our world leaders take responsibility for caring and nurturing our environment? When will our world leaders have courage to do what's right for the planet instead of worshipping the almighty dollar?

Kindness is more important than wisdom, and the recognition of this is the beginning of wisdom. - Theodore Issc” (EPA-HQ-OAR-2009-0923-1899-2)

Comment:

“Let act to make them responsible before we have more pollution than we already do. I own a condo on the gulf shore of Florida. I know my family will not be able to enjoy this condo as we thought we would probably EVER with the oil flowing towards our shores. If you have ever watched the small animals that make up the basis of life you will know it has been destroyed and may not recover for decades. Make renewable energy a priority. Keep big oil and gas companies accountable.” (EPA-HQ-OAR-2009-0923-1902-1)

Comment:

“What are you doing to stand in the gap for your country? The individuals in public office have a responsibility to our country to besure WE ARE ALL held accountable for what we do and that includes the gas and oil industry. I know they are very powerful and have deep pockets and great influence, but here is where you have a choice that will effect the outcome of this country in this area of industry. Where do you stand?” (EPA-HQ-OAR-2009-0923-1903-1)

Comment:

“We have very little time to turn all our mistakes around. We MUST start now!! Please do your part.” (EPA-HQ-OAR-2009-0923-1904-1)

Comment:

“I am writing from the other side of the world, New Zealand, where, I understand we have large hydrocarbon reservoirs in the Great South Basin over which flows some of the roughest oceans in the world; the Sub-Antarctic. The BP disaster has strengthened our resolve to keep Big Oil out of the Southern Oceans as they cannot be trusted. NZers are already boycotting BP in New Zealand. If America wants to lead the way in green technology, it must hold such Corporate Raiders fully accountable.” (EPA-HQ-OAR-2009-0923-1905-2)

Comment:

“Common sense and the free market (if you believe in it) dictate that those who pay for the pollution when things go wrong should be the ones who profit from it when things go "right"!! Please don't let the special-interest lobbyists get their way at the expense of the wider public and the natural world! Deep Sea Horizon is an experiment gone wrong, but it's also a wake-up call we sorely needed. Fossil fuels are not the way forward, not only because of disasters like this one but also because of the probability -some would say certainty - that consumption at current rates will cause catastrophic global warming by the end of the century (4-6 degree average temperature rise, several metres in sea-level and much more). And finally, these fuels will run out all too soon anyway. So let's find a way forward while there's still time and before our planet, our only home, is irreparably damaged. A bare minimum is to make sure the oil, gas and coal companies don't actually get a free ride while furthering this damage!” (EPA-HQ-OAR-2009-0923-1907-2)

Comment:

“Mandatory reporting of onshore and offshore oil drilling GHG for the oil industry is essential for America to set a baseline and know what our emissions are. Every business in America should be held to the same rules.” (EPA-HQ-OAR-2009-0923-1908-2)

Comment:

“Hey if not now, when? We will never have a better chance of holding big oil accountable and making them responsible. Chances are that if we don't do it now we probably never will.” (EPA-HQ-OAR-2009-0923-1910-2)

Comment:

“Thanks you for ensuring the safety of our onshore and offshore resources.” (EPA-HQ-OAR-2009-0923-1912-2)

Comment:

“We are pleased that the EPA, this year, is proposing to require that the oil and gas industries be included under the mandatory greenhouse gas reporting rule. We understand that these industries, last year, lobbied their way out of this requirement. Please follow through. Please ensure that the reporting system uses rigorous, detailed, direct pollution measurements. Please ensure that the emissions of these industries are included in the reporting system. Please require this as soon as possible.” (EPA-HQ-OAR-2009-0923-1914-1)

Comment:

“No more slaps on the hand only to turn and look the other way, EVER.” (EPA-HQ-OAR-2009-0923-1915-2)

Comment:

“We will help you and support you through this process. Please help us help ourselves to stop the pollution of our air and water.” (EPA-HQ-OAR-2009-0923-1916-1)

Comment:

“I believe that the oil and gas industry must follow the same rules that others follow if we are to achieve the goal of protecting our water supply and our planet. I understand that the EPA is proposing to include these industries in the system - and I support this decision.

We can and should use our natural resources but ONLY if we do so fairly and safely. Thank you for your work.” (EPA-HQ-OAR-2009-0923-1917-1)

Comment:

“It is clear that the oil industry will not voluntarily do what is in the best interest of the American people. It is your role as a government agency to develop and fully enforce environmental regulations to protect our lands and waters for everyone.” (EPA-HQ-OAR-2009-0923-1918-1)

Comment:

“It’s time to move from oil and coal to wind and solar. Find ways to use natural gas until these can be fully utilized. There is enough wind to supply America's energy needs, we have the technology, help those employed in the coal and oil industry retrain to move to healthier jobs (no explosions, mine cave-ins, black lung disease) that supply clean on-polluting energy to cut global warming and save our planet.

Americans wait for crisis before acting, the crisis is now, act now.” (EPA-HQ-OAR-2009-0923-1919-3)

Comment:

“This is a real disaster waiting to happen to all of our coastlines and it is imperative that our country is protected especially in these post-911 times! Please this is important.” (EPA-HQ-OAR-2009-0923-1920-2)

Comment:

“I urge you to include ALL of the oil industry's emissions, off shore or otherwise, in the mandatory greenhouse gas reporting rule. It looks suspicious that this part of their business was excluded up until now. The EPA needs to close this loophole completely, enforcing honest and complete reporting of greenhouse gases.” (EPA-HQ-OAR-2009-0923-1921-1)

Comment:

“Not only that, but I want to see BP pay everyone whose livelihoods have been destroyed by this disaster.” (EPA-HQ-OAR-2009-0923-1922-3)

Comment:

“If regulation of greenhouse gases is to be effective at all, we need to monitor every relevant industry.” (EPA-HQ-OAR-2009-0923-1923-1)

Comment:

“In this time in particular of increased demand for resources and potentially catastrophic technologies, we must learn to hold ourselves and each other to adult standards of accountability and responsibility. There never was an excuse to think only of the single bottom line, but now we have experienced the results of that sociopathic mindset many times recently.” (EPA-HQ-OAR-2009-0923-1925-2)

Comment:

“We have seen what can happen without rigorous enforcement of the existing oversights. Do we want to have it continue happening. I know I don't.” (EPA-HQ-OAR-2009-0923-1926-1)

Comment:

“Come on you guys. Let's get with it and have some accountable from this heretofore sacred industry.” (EPA-HQ-OAR-2009-0923-1927-1)

Comment:

“We need to all care about this for future generations and we need to remember that what we do to the earth we do to ourselves. Money and greed will be our demise if we ALL don't wake up to what truly matters. Holding the oil and gas industry accountable is the beginning to them caring as well.” (EPA-HQ-OAR-2009-0923-1928-2)

Comment:

“Like all citizens, I am fully aware of the need for ENERGY, but have been so sickened by the sights of the ravages this SPILL is causing to Industry and Marine Life that we MUST pledge to do better to create a more humane and sustainable mode of extraction.” (EPA-HQ-OAR-2009-0923-1930-1)

Comment:

“Don't let the oil companies make out with all the profits without assuming the risks. Don't make taxpayers foot the bill for their greed. Require better safety measures be in place....better yet, end offshore drilling entirely and require investment into renewable energy research.

Whatever you don't, get the heck away from the status quo.” (EPA-HQ-OAR-2009-0923-1932-1)

Comment:

“We are, as a country or, at least, a government, unwilling to seriously challenge or limit anything called a corporation. The BP disaster and the tendency to continue environmental "free hand ' to it and to corporations in general must end here and now.” (EPA-HQ-OAR-2009-0923-1933-1)

Comment:

“DON'T LET BIG OIL/GAS GET AWAY WITH THE GULF OIL SPILL, THE WORST ENVIRONMENTAL DISASTER OF ALL TIME -BANKRUPT THEM IF NEED BE SO THEY CAN NEVER DO THIS AGAIN. NOT PREVENTING THEM FROM USING COREXIT IN THE GULF AND KILLING/DESTROYING THOUSANDS OF ORGANISMS, FISH, BIRDS, MAMMALS, CORAL, ECO SYSTEMS, ETC. IS UNCONSCIONABLE! WE SHOULD HAVE STOPPED THEM - THIS IS OUR COUNTRY, WHAT IS LEFT OF IT, NOT BP'S - THIS IS VERY DISTURBING. PLEASE MAKE IT RIGHT! THANK YOU! MANY BLESSINGS.” (EPA-HQ-OAR-2009-0923-1934-1)

Comment:

“NONE OF THIS MATTERS TO THE WILDLIFE, THE RESIDENTS, NOR THOSE WHO LOST THEIR LIVES, IF THE VERY AGENCIES WHO ARE CHARGED WITH SAFETY CHECKS DONOT DO THEM (AND/OR THE OIL AND GAS INDUSTRY KNOWINGLY SKIPS THEM), THEN THE CORPORATIONS INVOLVED SPEND THEIR ENERGY BLAMING EACH OTHER. I REMEMBER TWENTY ONE YEARS AGO WHEN THE EXON VALDEZ SPILL WAS "NEVER TO HAPPEN AGAIN"BUT CORDOVA, AL. HAS NEVER BEEN THE SAME, AND THOUSANDS OF LIVES WERE DEVASTATED, BUT NOT COMPENSATED. STOP OFFSHORE DRILLING, AND DEVELOP OTHER ENERGY SOURCES.” (EPA-HQ-OAR-2009-0923-1935-1)

Comment:

“We must act urgently and soon to save ourselves from the dire consequences of climate change and get away from oil.” (EPA-HQ-OAR-2009-0923-1936-1)

Comment:

“The heartrending devastation in the Gulf - wrought by carelessness, greed and BP's outright criminal negligence clearly illustrates the need for corporate accountability. Shamefully, just last year, the industry was able to lobby its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. Currently, the EPA has proposed setting things right - finally including both offshore and onshore oil/gas industry in the system. All thinking, caring, people strongly support that decision. Please ensure the system uses stringent, detailed/definitive, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. Adequate regulation may help prevent future environmental catastrophe. Profit motivated, "penny-wise pound-foolish" corporate ideology must be prevented from repeatedly wrecking havoc in our nation - the EPA must help protect us.” (EPA-HQ-OAR-2009-0923-1937-2)

Comment:

“I just heard that Exxon is still stalling in court...how many years later? These guys are ruining our earth. They need to be held ACCOUNTABLE! And isn't that the job of the EPA?” (EPA-HQ-OAR-2009-0923-1939-2)

Comment:

“If no other lesson has been learned from the disaster in the Gulf, it's that the oil companies need to be watched over more closely by the federal government. My heart bleeds every time I see or read an article about what is happening and what is going to be happening to the ecology and economy of the Gulf Coast area.” (EPA-HQ-OAR-2009-0923-1942-1)

Comment:

“I am not happy with the current rate of pollution being put into the environment, and the cause (as I see it) is short term profits and bonuses for the top executive level people at the cost of long term health issues that arise from living in a polluted environment.” (EPA-HQ-OAR-2009-0923-1943-1)

Comment:

“Please, for the sake of my 1 year old grandson and all the other children who will be growing up in the next years, let's push for cleaner energy without the pollution. Please make the on and off shore activities of big oil reportable and accounted for. Do everything you can to accomplish this to reduce pollution. SAND FIRM, ON THESE ISSUES. Thanks you very much for all of us who care.” (EPA-HQ-OAR-2009-0923-1945-1)

Comment:

“It has been truly heart-breaking to watch what seems likely to be the slow death of the Gulf Mexico, at a cost of human livelihoods and precious marine habitats and species -- all because assurances that devices were fail-safe, and emergency measures were prepared in advance, turned out to be tragically untrue.” (EPA-HQ-OAR-2009-0923-1946-1)

Comment:

“We are devastating this planet. If we do not stop drilling for oil, and polluting the seas, the land and the air, we will cease to exist as a species. Those who think this is overly dramatic, are hiding their heads in the oil-drenched sand.” (EPA-HQ-OAR-2009-0923-1947-3)

Comment:

“Don't let them get away with their destruction of the planet.” (EPA-HQ-OAR-2009-0923-1949-2)

Comment:

“It is time to make our environment and our children's future more important than big homes, big cars and lavish lifestyles that demand continually more energy, to say nothing of profits going to excessively high executive salaries.” (EPA-HQ-OAR-2009-0923-1950-2)

Comment:

“The oil and gas industry must be regulated more closely.” (EPA-HQ-OAR-2009-0923-1951-2)

Comment:

“The impacts from an oil well gone wild are now horribly clear and sadly horrifically wide spread. The US government can permit but must condition permits so that the recipient is held fully accountable for mistakes and for the extensive disruptions to our global ecosystem. The US government must not take on this responsibility as it did with the super fund to clean up toxic waste sites. Instead, it must demand that a permittee extract cleanly and be held accountable if they cannot.” (EPA-HQ-OAR-2009-0923-1952-1)

Comment:

“Please help to protect the fragile ecosystems that have not already been decimated beyond recovery.” (EPA-HQ-OAR-2009-0923-1953-2)

Comment:

“Omission of information is just a lame cover up of the truth. We are totally disgusted with the lying and cheating in business and government support of it. DO YOUR DAMNED JOB!” (EPA-HQ-OAR-2009-0923-1955-3)

Comment:

“This oil leak, the largest in U.S. history, and the incompetent way in which BP has handled it, has caused, and is continuing to cause incalculable damage to the Gulf Coast, and not to mention the economy of the Gulf Coast region.

It's possible if this leak is not stopped, it's not an exaggeration to state that it may actually 'kill'

the Gulf of Mexico, especially if the leak continues until August, as is now projected.

This is one of the biggest crimes in Corporate history. It is a crime, even if "only" a crime of negligence, as the wanton destruction of property and land is defined as a crime, regardless of the "motive" or "intention" .

To prevent future disasters of this magnitude, which our country can simply not afford, BP MUST be held accountable and forced to pay for the hundreds of billions of dollars of damage that will be a result of this disaster.” (EPA-HQ-OAR-2009-0923-1956-2)

Comment:

“Our country can simply not afford another disaster of this magnitude to occur again, and the only way to help prevent that is to monitor their enormous pollution and to regulate their massive emissions that are contributing to the ever accelerating and dangerous growth of global warming.” (EPA-HQ-OAR-2009-0923-1956-3)

Comment:

“This is only a start on what must be done, but we need to make this start, and a lot of others. Thank you very much for doing whatever you can to rein in the completely unacceptable behavior of this industry. Our planet does not deserve this.” (EPA-HQ-OAR-2009-0923-1958-2)

Comment:

“The EPA is supposed to be the protector of the people within our borders, and I'm really not sure that's been true lately -- If you don't protect us, who will???Please remember that I'm on of millions counting on YOU to do what you are supposed to do, regardless of pressures from corporations or political pressure....and I'll continue to do my part by paying my taxes and keeping track of the enormous challenges you are being asked to meet..... and will keep cheering you on. Don't think I'm not paying attention!!!!” (EPA-HQ-OAR-2009-0923-1961-1)

Comment:

“Even before the BP disaster I began to wonder what it would take to get the entire planet to realize how much we have damaged our Earth. Now, I am grieving because of this major catastrophe and how those that have the power are still not willing to stop drilling in our waters - period. Since we have never experienced a spill of this magnitude, how can we speculate on the damage and how long it will take the earth to repair itself, if ever.

It is with the greatest sincerity that I ask that you halt the destruction of the only planet we have to inhabit before it is too late.” (EPA-HQ-OAR-2009-0923-1962-2)

Comment:

“EPA is proposing finally to include the offshore and onshore oil and gas industry in requirements to report greenhouse gas emissions. This laudable decision is long-overdue. I urge you to include these emissions as soon as possible, and to ensure that reported values be based on rigorous, detailed, direct pollution measurements.” (EPA-HQ-OAR-2009-0923-1963-1)

Comment:

“This information should not be self reported but should have some way of it being monitored. I would imagine there is some sort of hardware that can be installed. If left up to the industries they will lie. We saw it with BP and their estimate of the oil leak. These companies already get subsidies but should not be subsidized when it come to the health of America and Americans!” (EPA-HQ-OAR-2009-0923-1964-1)

Comment:

“For future generations we need a new direction away from coal and gas as fuel whose extraction and use are making earth uninhabitable!” (EPA-HQ-OAR-2009-0923-1965-1)

Comment:

“Do we need to say anything more? THE ENTIRE COUNTRY WANTS A CLEAN ENVIRONMENT! Government needs to oversee, not "stand back" and watch as we all drown in OIL.

By the way, MICROBES can be used to "eat" the oil without any negative impact on man, animals or plant life. Why aren't we using them to clean the shore?” (EPA-HQ-OAR-2009-0923-1966-1)

Comment:

“We're running out of time, and we're counting on you.” (EPA-HQ-OAR-2009-0923-1967-1)

Comment:

“I only hope it is not too late to stop the chain of damage done already.” (EPA-HQ-OAR-2009-0923-1969-1)

Comment:

“It's time that everyone really step up the game. We must be environmentally responsible before it's too late.” (EPA-HQ-OAR-2009-0923-1970-1)

Comment:

“Enough is enough. The oil and gas industries must take responsibility for the huge part they have in adding to pollution.” (EPA-HQ-OAR-2009-0923-1971-1)

Comment:

“Please carry out the EPA mandate of protecting the environment from industries that count on little oversight and tax payer money to fix the problems after the fact.” (EPA-HQ-OAR-2009-0923-1972-3)

Comment:

“They are putting forth one possible method to stop the current ongoing disaster. Then spend time expediting how are they assembling the parts, and getting everything together. When the method fails, they restart the process. They should have several teams doing the preliminary work for several proposed methods in parallel to shorten the time line. This shows their disdain for the earth and the health of the earth's biosphere! Their only concern is getting more money.” (EPA-HQ-OAR-2009-0923-1973-2)

Comment:

“The Deep water Horizon Blowout in the Gulf of Mexico has shown just how willing and eager the oil and gas industry is to under report its pollution when it even bothers to report pollution at all. Gallons or barrels released per minute doesn't even begin to start to account for the air pollution and carbon load additions from directional natural gas releases that bubble into the air or for gas hydrates for long term release into the ocean or air and yet have grossly under reported the direct water pollution and BP in its response plan submitted to MMS had no plans but identified the problems that would be created, which showed bad faith in my opinion. How can anything that identifies no real timely response but only problems be substituted for a response plan?

As an oil major, BP has shown the oil industry is not worthy of the trust it had been given. It

needs to be held to closer account, as your proposed rule begins to do.” (EPA-HQ-OAR-2009-0923-1974-2)

Comment:

“The American people have had to pay for too many mistakes. We should not have to pay for any more - especially when corporations, such as BP, continue to show quarterly profits that make one's head spin!

BP, and in fact all corporations, MUST be held accountable and financially responsible for what they do! There is still damage in Alaska from the Exxon Valdez spill. How long will it take for the environment to fully recover from that we really don't know. The mess from this mistake in the Gulf may take forever to correct. In fact, the Gulf may never recover! BP must be held fully accountable. No passes, no waivers!

The person who ordered the drilling to continue after the blow out valve failed should be put in jail, and anyone who encouraged that full speed ahead, without regard for safety and protection of the environment, should also go to jail!” (EPA-HQ-OAR-2009-0923-1977-2)

Comment:

“This is as important as financial regulation!!!” (EPA-HQ-OAR-2009-0923-1978-1)

Comment:

“Please REMEMBER that every time a government fails to act in the interest of the citizenry, it loses some of the respect and confidence that it would otherwise enjoy. Governing without that respect and confidence will become more and more difficult, which is why people tend to join groups such as the T.E.A. Party.” (EPA-HQ-OAR-2009-0923-1979-1)

Comment:

“Now is the time to move to alternative, safe healthy fuels. The USA must invest time, money and resources into new ways of powering our lives.

We need strong detailed rules on emissions and prevention of pollution.” (EPA-HQ-OAR-2009-0923-1980-3)

Comment:

“I would most likely go to prison if I did what BP has done. No matter how much the oil industry lobbies to worm its way out of responsibility, shouldn't it be held to the same standards or even higher standards considering what's at stake here? Shame on the political process that lets them buy their way out of the rules and regulations the rest of us must follow, and shame on them for wanting to. It's a horrible price to pay for ruining the environment.

Think less of the short term goal of obtaining oil, and think more of the long term consequences of what they've already done and will continue to do if you don't put a stop to it.” (EPA-HQ-OAR-2009-0923-1981-1)

Comment:

“It seems all too often that appropriate action is driven by tragedy!” (EPA-HQ-OAR-2009-0923-1982-2)

Comment:

“We can all see now quite clearly that the oil and gas industry needs to be held accountable for any and all problems it causes. The latest BP debacle is just the most recent & dramatic reminder of how unscrupulous and irresponsible they have been allowed to become.” (EPA-HQ-OAR-2009-0923-1984-1)

Comment:

“As a resident of the Gulf Coast, I am appalled and heartbroken by BP's negligent and irresponsible approach to the current catastrophe in the Gulf of Mexico. While I fully understand the technological challenges faced in capping the leak, there is fairly clear evidence that this was a preventable event that resulted from systemic measures implemented to minimize costs and maximize corporate profitability. BP's lack of candor with the American people has been reprehensible, if not criminal.” (EPA-HQ-OAR-2009-0923-1986-2)

Comment:

“This past month has definitely shown that this industry cannot be counted on to do what is right, or even ethical. It is time they were held accountable to the public and in a public forum.” (EPA-HQ-OAR-2009-0923-1987-3)

Comment:

“Please make people and planet earth more important than money. Relationships with people and nature will determine your well being not money.” (EPA-HQ-OAR-2009-0923-1990-1)

Comment:

“HOLD THEM TO THE LINE TIME IS RUNNING OUT DO WE WANT TO SEE OUR WORLD BECOME ABOUT AS INHABITABLE AS 'MARS' IN OUR LIFETIME ? NO WE DON'T THE CORPORATIONS DO NOT SEEM TO CARE ABOUT THIS FACT.” (EPA-HQ-OAR-2009-0923-1992-1)

Comment:

“The oil companies must not continue same old, same old. They must be held accountable for ALL their pollution, onshore & offshore ---NOW!” (EPA-HQ-OAR-2009-0923-1993-1)

Comment:

“The disaster in the Gulf of Mexico is appalling in every dimension, and the news gets worse by the day. No society can afford such destruction of people's livelihoods, their immediate environment, and the marine environment not only of our coasts but far beyond our shores.” (EPA-HQ-OAR-2009-0923-1995-1)

Comment:

“Further, do not permit any drilling operation that does not post a multi-billion dollar bond to be cover the initial costs of the damage, but in no case constituting a "cap" or other limit on civil or criminal liability.” (EPA-HQ-OAR-2009-0923-1997-1)

Comment:

“The oil spill in the Gulf is a disaster. How can another such be prevented in the future? A start would be to implement the EPA's proposal. That is, to make mandatory that the off and on shore oil industry must report their pollution emissions using direct, rigorous and detailed measurements soon as possible.” (EPA-HQ-OAR-2009-0923-1998-2)

Comment:

“It is well past the time for us to make sure the oil and gas industry is regulated and pays for the impacts it has on our world.” (EPA-HQ-OAR-2009-0923-1999-1)

Comment:

“It has broken my heart to watch the damage caused by BP in the Gulf of Mexico and along the U.S. southern coastline, an area which was already struggling. Both humans and wildlife are now forced to face widespread destruction of their environment.” (EPA-HQ-OAR-2009-0923-2000-1)

Comment:

“Sadly, in this country, and others, those with BIG MONEY want to play the game their way, regardless of the harm to future generations. This CANNOT continue!” (EPA-HQ-OAR-2009-0923-2001-3)

Comment:

“It is time the oil and gas companies play by the same rules that we are to play by. I am tired of seeing laws rewritten to protect the oil and gas companies. As a veteran I fought for all to obey the laws. They are no better than we are.” (EPA-HQ-OAR-2009-0923-2005-1)

Comment:

“In addition, please realize the BP disaster must be a wake-up call a halt to big profits running the decision-making that so directly affects the protection of our natural resources and the everyday man's livelihoods.

BP assets should now be taken over and used to clean up what will be left from the disaster they have caused, and paying the region's people salaries for the rest of their lives.

BP should also pay a subsidy across the board to keep our gasoline prices and food prices from soaring, as a result of their greed and carelessness.

There is no way to make up for the loss and injury to wildlife, wetlands and seashores that will be ruined perhaps forever. The 'dead zone' that use of the dispersants and the oil are going to leave in their wake, will be just that, dead.

BP must be made brought account without loopholes. ” (EPA-HQ-OAR-2009-0923-2007-1)

Comment:

“I am sick and tired of watching the petrochemical industry have free access to public lands and seas and despoiling them at the cost of taxpayers. Superfund cleanups, toxification of our lands and restricted public access are just some of the inequitable practices to which extraction industry advocates have tethered our energy policy. If we wanted more corrupt government-oil

industry policies, we would all be hollering for Dick Cheney to head the MMS. To grant more leases for offshore and onshore oil drilling only benefits a limited segment of our nation; it sure as hell isn't going to alleviate our dependence on oil by drilling in North American waters. It does keep oil executives rich along with the politicians that accept lobbyist dollars to secure their offices. As for drilling the sea floor at the astronomical pressures in deepwater exploration, I wouldn't even trust Bob Ballard and his expertise to work on the sea floor at those depths. It's patently absurd and equally as arrogant to believe we have adequate technology to circumvent disasters; we have more expertise getting to the moon so tell those jerks from BP, Shell, Exxon Mobile and the rest, to go drill on the damn moon and leave what remains of an intact biosphere to those of us who rely on it more than oil and money.” (EPA-HQ-OAR-2009-0923-2008-2)

Comment:

“Time is overdue for accountability. That includes the current administration.” (EPA-HQ-OAR-2009-0923-2010-2)

Comment:

“We can't go on like this. If you don't get pollution under control it will be to late.” (EPA-HQ-OAR-2009-0923-2011-1)

Comment:

“It has been brought to my attention that last year the oil and gas companies lobbied their way out of the mandatory greenhouse gas reporting rule. I can only ask why and how? If we want to be a county that can take pride in itself then the practice of looking the other way for big money companies needs to be unacceptable and your agency needs to lead the way!

The use of rigorous, detailed, direct pollution measurements and required emissions reporting shouldn't be a voluntary or preferential requirement of the EPA. Please do your job in an honorable way and get his job done!” (EPA-HQ-OAR-2009-0923-2012-2)

Comment:

“My livelihood is dependent on snow which encourages my awareness of global warming. The livelihoods of many will be affected by global warming so we must hold the all business accountable for their greenhouse gas. I feel for those in the gulf as they watch this disaster unfold. BP must be held accountable for the many lives, livelihoods and the treasured environment that they have affected.” (EPA-HQ-OAR-2009-0923-2014-1)

Comment:

“This was only one oil well failure and just look at the disaster in the Gulf of Mexico. The loss of wildlife alone should be enough to make all of us sick. Why on earth do any of us allow these people to get away with the things they do? All in order to increase their bottom line? We absolutely need to get away from our insane dependency on oil before we completely destroy our world and ourselves along with it. Shame on you EPA. Your mandate is to protect us, not to protect the interests of big oil and their monetary profits. PLEASE hold them totally responsible for destroying that part of our world.” (EPA-HQ-OAR-2009-0923-2015-1)

Comment:

“It is essential we take measures to reduce greenhouse gases and work toward a clean energy future in our nation.” (EPA-HQ-OAR-2009-0923-2017-1)

Comment:

“KNOCKEMSTIFF, MADAM SECRETARY, KNOCKEMSTIFF. BP AND OTHER EXTRACTIVEINDUSTRIES ARE DESTROYING YOUR BEAUTIFUL HOMELAND OF LOUISIANA. THE MAJORITY OF CITIZENS ARE BEHIND YOUR STRONG DECISIONS TO SAVE THIS NATION !!!!!!!” (EPA-HQ-OAR-2009-0923-2018-1)

Comment:

“This is of grave importance to all future generations.” (EPA-HQ-OAR-2009-0923-2019-2)

Comment:

“Its high time the EPA begin to actually do what it was intended to do, protect our environment for big money corporations!” (EPA-HQ-OAR-2009-0923-2020-2)

Comment:

“There is no argument we need energy. However we need to know the issues surrounding all types of energy.

We certainly need to know what is emitted before it begins.

Use intelligence and logic. place the environment before economics. It is the right thing to do” (EPA-HQ-OAR-2009-0923-2021-1)

Comment:

“If we are ever to solve our energy crises, the most important element has to be a clear and objective evaluation of the costs and benefits of those methods we currently use to generate energy.” (EPA-HQ-OAR-2009-0923-2023-2)

Comment:

“We must show the leadership that puts the environment and the future of our planet before profits. The checks and balances have failed and rules have been lax for too long. This must stop now! Please do the right thing and quit allowing big business to dictate what needs to happen to insure a failsafe system---you must be the gatekeeper!” (EPA-HQ-OAR-2009-0923-2024-1)

Comment:

“I hope that this worst of all catastrophes can be remedied and that repairs can be made to the planet. We must stop making these horrible mistakes and learn to live in harmony within the ecosystem.” (EPA-HQ-OAR-2009-0923-2026-2)

Comment:

“I know climate change is an important priority for you, keep up the good work standing up against the special interests who put their short term self interests ahead of the long term future of all our nation's citizens. Thank you.” (EPA-HQ-OAR-2009-0923-2027-1)

Comment:

“Please help fix this oversight and make the industry responsible take responsibility.” (EPA-HQ-OAR-2009-0923-2028-1)

Comment:

“Side-note: The EPA should take over the environmental enforcement functions from the MMS.” (EPA-HQ-OAR-2009-0923-2029-2)

Comment:

“As a member of a task force opposing Atlantic Sea Island, a planned man-made island off the coasts of New Jersey and Long Island NY which would serve as the site for a facility for regasifying imported natural gas, I am writing to support the EPA's plan to include the offshore oil and gas system in the system for mandatory greenhouse gas reporting.” (EPA-HQ-OAR-2009-0923-2030-2)

Comment:

“in addition why are we so POWER MAD.

The search for energy production has become so frantic that people are reconsidering using radioactive uranium to boil water, heating great quantities of our already over-used water, to turn turbines to provide electric power so more people can acquire more gadgets.

Within the past century our society has only become more adept at accelerating entropy. We are converting anything that contains stored and potential energy for silly and destructive purposes. Locally, the people's elected and appointed representatives are not objecting to the 19th century idea of burning wood (waste?) to heat water to turn steam turbines to produce more electricity, but, of course, we have to disguise what it really is because that doesn't sound "green". Biomass sounds "green" and it is according to my 1975 Webster's unabridged Dictionary. Biomass refers to "the total mass or amount of living organisms in a particular area or volume". So the idea of "biomass" as a natural state is flipped and the word co-opted – a specialty of corporate exploiters of the natural world. Sad thing is, much of the public is so easily suckered.

There is no waste in nature. Maintaining soil requires biological material, but the power mad want to incinerate biological material for heat and air pollution. In other words, they would remove carbon from the soil, where we need it; and put it in the air, where we don't need it. We need more power they say, so go watch stupid football games on TV.” (EPA-HQ-OAR-2009-0923-2031-2)

Comment:

“EPA stands for Environmental "Protection" Agency....so do what the American people have relied on you to do since your inception and protect this fragile environment. Do not continue to allow the oil and gas industry to lobby their way out of accountability for one environmental disaster after the other.” (EPA-HQ-OAR-2009-0923-2032-1)

Comment:

“I want Big Oil held accountable for their actions.” (EPA-HQ-OAR-2009-0923-2033-1)

Comment:

“If we need to continue drilling for foolish fuels, then we need to do so safely, for the people involved and for the environment – which ultimately affects everyone. And there's no excuse for

wasting energy, such as the gas drillers routinely vent off because it's difficult for them to capture.” (EPA-HQ-OAR-2009-0923-2034-2)

Comment:

“I'm accountable to my boss, why wouldn't the oil and gas industries be accountable to the American people? We pay their salaries in many different ways.” (EPA-HQ-OAR-2009-0923-2035-1)

Comment:

“This madness has to stop or we will destroy this precious earth we call home.” (EPA-HQ-OAR-2009-0923-2036-2)

Comment:

“Make no exceptions for the oil and gas industry!” (EPA-HQ-OAR-2009-0923-2037-1)

Comment:

“It is heartbreaking to see what is happening currently in the Gulf of Mexico. Please do the right thing so this does not happen again.” (EPA-HQ-OAR-2009-0923-2038-1)

Comment:

“Doing this will help level the playing field for clean alternative energy like wind.” (EPA-HQ-OAR-2009-0923-2039-1)

Comment:

“We are talking about human lives here! Profit means nothing if you are dead!” (EPA-HQ-OAR-2009-0923-2040-2)

Comment:

“We are being ripped off at the gas pump while the oil and gas industry make hundreds of billions of dollars, yet their incompetency, coupled with the government's refusal to engage in effective oversight and require fail safe systems, has now totally destroyed our planet, local ecology, the Gulf spill which eclipses all former spills. This is an industry whose time has come for payback.” (EPA-HQ-OAR-2009-0923-2041-1)

Comment:

“We have yet to see the final fallout of the Valdez spill this many years later! The people whose livelihoods are being ruined by this cannot be made to wait for 20years while BP uses every means at its considerable disposal to wait them out. Accountability must be extensive AND it must be swift.” (EPA-HQ-OAR-2009-0923-2043-1)

Comment:

“please take action now to prevent this in the future.” (EPA-HQ-OAR-2009-0923-2044-2)

Comment:

“Finally, the EPA has decided to PROTECT THE ENVIRONMENT!” (EPA-HQ-OAR-2009-0923-2045-1)

Comment:

“Reduced reliance on fossil fuel must become this country's priority. We cannot continue to disrupt the environment if we want to continue to have a viable planet.” (EPA-HQ-OAR-2009-0923-2046-2)

Comment:

“P.S. And how about we take look at newer and more sustainable energy technologies - OUR PLANET DESERVES IT!” (EPA-HQ-OAR-2009-0923-2047-2)

Comment:

“When we come to expect and demand by law that corporations be responsible for their actions and their decisions, then and ONLY THEN will they be. So, it is your responsibility as protector of US citizens to demand that by law.” (EPA-HQ-OAR-2009-0923-2048-1)

Comment:

“As a concern for integrity, please assure that loopholes and other means of deceit are eliminated.” (EPA-HQ-OAR-2009-0923-2049-1)

Comment:

“Those who profit from drilling are those who must be held accountable for accidents and spills, and must pay for any damages resulting from same. Oil companies and their contractors must bear full financial responsibility.” (EPA-HQ-OAR-2009-0923-2050-2)

Comment:

“You owe this not only to the current population on this continent (planet) but also to the future ones.” (EPA-HQ-OAR-2009-0923-2051-1)

Comment:

“Don't be afraid to take on big oil The nation is with you. If you don't, you are looking at the future of the world in the gulf of Mexico.” (EPA-HQ-OAR-2009-0923-2054-1)

Comment:

“I think all off-shore drilling should be stopped. Put these people to work on ways to make care less dependent on gases as well as other ways to heat homes that are affordable to all home owners not just rich ones.” (EPA-HQ-OAR-2009-0923-2055-2)

Comment:

“In my opinion, no oil company should ever be allowed to short cut safety rules ever again. Every safety measure that can be set forth must be adhered to 100%.” (EPA-HQ-OAR-2009-0923-2056-1)

Comment:

“It is within your power to protect the environment and our wildlife, along with the health of present and future generations. I urge you to take the necessary actions to make this protection real and permanent.” (EPA-HQ-OAR-2009-0923-2057-2)

Comment:

“What is happening off the coast of Louisiana right now infuriates me!” (EPA-HQ-OAR-2009-0923-2058-1)

Comment:

“This is of grave importance to all future generations.” (EPA-HQ-OAR-2009-0923-2059-2)

Comment:

“It's past time to stop looking the other while corporations continue to damage or destroy our environment without any real consequences.” (EPA-HQ-OAR-2009-0923-2060-2)

Comment:

“The oil spill is the direct responsibility of those who allowed laws to be waived.” (EPA-HQ-OAR-2009-0923-2061-2)

Comment:

“We don't ever want to see something like this happen again.” (EPA-HQ-OAR-2009-0923-2062-3)

Comment:

“The illusion of economic gain by short-cutting these types of precautions must be dispelled. There is no profit to be made by destroying the basis of our livelihood and well being, and in the end will cost far more in terms of health and environmental devastation than some well placed safe guards now.” (EPA-HQ-OAR-2009-0923-2063-2)

Comment:

“We all must be held accountable for our actions.” (EPA-HQ-OAR-2009-0923-2065-1)

Comment:

“If large corporations can contribute to political campaigns like individuals can, they surely should be held accountable for greenhouse gas emissions.” (EPA-HQ-OAR-2009-0923-2066-2)

Comment:

“How devastating a disaster does it take to wake up to the need to change the way giant oil corporations profit at the expense of the planet?” (EPA-HQ-OAR-2009-0923-2067-2)

Comment:

“Hold polluters responsible!” (EPA-HQ-OAR-2009-0923-2068-2)

Comment:

“I live in La and this is a disaster for the environment, birds and animals and wetlands and people who depend on clean water for a living.” (EPA-HQ-OAR-2009-0923-2069-1)

Comment:

“It's blatantly obvious that the oil corporations are completely untrustworthy and are run without any sort of conscience or even a sense of decency.” (EPA-HQ-OAR-2009-0923-2071-3)

Comment:

“Thank you again for your efforts in helping prevent such a catastrophic disaster from happening again.” (EPA-HQ-OAR-2009-0923-2072-2)

Comment:

“Please do everything you can to ensure that the oil and gas industry is held accountable for their pollution and destruction of our shared environmental resources.” (EPA-HQ-OAR-2009-0923-2073-1)

Comment:

“Green washing and public relations generally will be the tack taken by BP and Big Oil in general.” (EPA-HQ-OAR-2009-0923-2074-1)

Comment:

“You sold us out for big oil shame on you....This is bigger than 911 soon you can kill the entire gulf and drill where you want. God help us all...” (EPA-HQ-OAR-2009-0923-2075-1)

Comment:

“I live year round in the ecologically sensitive Florida Keys. I am currently concerned about the effect the oil industry is going to have on my real estate values and on my employment. I naturally want to do everything I can to hold BP and others to task.” (EPA-HQ-OAR-2009-0923-2076-3)

Comment:

“As an avid outdoorswoman I am enraged by the ecological disaster BP has unleashed on our environment and am terrified of the repercussions we will all be experiencing due to the oil pollution that continues today. These repercussions will be felt for years to come as the oil work

sits way thru the different currents around the Gulf and into the Atlantic, and as the chemical dispersants work their way thru the food chain. I have already made a decision to not eat any sea food harvested in the Gulf of Mexico as I do not want to risk my health to these contaminants, and I'm sure many others will be making this choice which will decimate the fisheries industry. I have just completed BP's online Training for Minimal Exposure Conditions for the Mississippi Canyon 252 Spill. I find it highly ironic how much effort BP put into creating a training program that over emphasized all the risks I might face as I help to clean up this mess, yet they did not apply this same level of risk prevention to the actual execution of their deep sea well. We must hold BP and all other oil exploration company's accountable, and we MUST IMPLEMENT STRICT CONTROLS over all Deep Sea exploration as this disaster demonstrates that the oil companies do not have the technical means to safely extract oil from these depths.” (EPA-HQ-OAR-2009-0923-2077-1)

Comment:

“What has been going on now for over a month in the Gulf is heartbreaking. It is unbelievable that we, as Americans, are so dependent on oil that we offer financial bonuses to people who are in charge of approving the oil drilling leases as fast as possible. What do you expect if that is the policy? We need strong enforcement of environmental laws and regulations to safeguard the environment and the livelihoods of people who depend on fishing/hunting/etc. in areas where the oil companies want to drill.” (EPA-HQ-OAR-2009-0923-2078-2)

Comment:

“We keep hearing the public say we need to hold individuals and corporations accountable for their actions. BP needs to be forced to disclose all the ugly details on their part in this ecological and financial disaster. The news reports sound as if this avoidable accident just affects tourism and the fishing industry in the U.S. BP's cost cutting decision at the world's expense is harming all life on the planet. BP must be held accountable and not allowed to hide behind a loop hole in the regulations. Keep their feet to the fire!” (EPA-HQ-OAR-2009-0923-2079-3)

Comment:

“There is no earthly reason why these industries should be exempt from the reporting rule. They may claim that reporting on their greenhouse gas emissions - let alone doing anything about them - is 'too expensive', but it's hard to believe this claim from an industry which routinely shows multi-billion-dollar profits. The rest of us - now, and future generations - shouldn't have to pay the price for those profits. Please require the oil and gas industries to adhere to the greenhouse gas reporting rules.” (EPA-HQ-OAR-2009-0923-2080-1)

Comment:

“I am very glad the Administration is proposing to split up the Minerals Management Service. It is clearly unable to both generate revenue from leases and also impose effective safety standards on the oil and gas industry.

I urge the EPA to be strong, persistent unambiguous in its regulations.” (EPA-HQ-OAR-2009-0923-2081-1)

Comment:

“I don’t know what "system" this letter is talking about, but I certainly do think that BP and all other oil, gas, and coal giants should be forced to take FULL financial and clean-up responsibility for all the catastrophes that they create. They should also be forced to REPORT openly, fully, and on an ongoing basis on all measures that they are (and are not!) taking to eliminate the pollution that they create-- in the air, on land, and in the water. I urge you most strongly to exercise control over these giants to the maximum of EPA's powers.” (EPA-HQ-OAR-2009-0923-2082-3)

Comment:

“Wake up and smell the oil! One thing is crystal clear from the BP disaster (and it sure isn't the water!!) - the Oil Corporations must be held accountable. To consistently ignore and subvert the policies that are meant to protect the Whole Earth is beyond reprehensible.

When the oceans die, we all die. There won't be any more oxygen in the gated communities of Connecticut and Georgetown than in the slums of Detroit and New Delhi.” (EPA-HQ-OAR-2009-0923-2083-1)

Comment:

“In particular, all offshore and onshore rigs must be held to strict regulations which include having \$500,000 preventative parts installed prior to drilling so this oil spill CATASTROPHE doesn't happen again. It shouldn't have happened in the first place if off-shore drilling regulations were in place.

Please stop wasting time with finger-pointing and let's pull together using mankind's intelligent research to save our planet, rather than destroy it by mankind's hubris and greed.” (EPA-HQ-OAR-2009-0923-2084-1)

Comment:

“We absolutely MUST transition to clean renewables asap. First step: stop subsidizing the oil & coal industries NOW.” (EPA-HQ-OAR-2009-0923-2085-1)

Comment:

“I feel that for too long the oil/gas industry has used it's lobbyist muscle to evade responsibility for events (whether they be discharges, spills, or routine air pollution due to combustion) that have no realistic possibility of clean up. Government needs to create and enforce laws that will stop the pollution, because industry won't.” (EPA-HQ-OAR-2009-0923-2086-1)

Comment:

“PLEASE, if there is anyone there with a conscience, PLEASE hold BP accountable for every single life lost in this disaster, and they should pay for every single person's livelihood which is now ruined. Every penny should be kept track of and then COLLECTED by our government. Maybe that will make these oil companies realize that they and their money are not above the rest of us, and that they cannot bypass the laws that help to protect us all from this exact kind of disaster!” (EPA-HQ-OAR-2009-0923-2090-1)

Comment:

“Oil and gas are some of the most polluting industries out there and it is only fair that they should have to report their greenhouse gas emissions like everyone else. They aren't special; in fact, based on the catastrophe unfolding in the Gulf, they deserve hard scrutiny and BIG consequences for their unsafe actions. With your help, we can help our planet survive, and with it, us and every living creature who depends on it, too. Thank you.” (EPA-HQ-OAR-2009-0923-2091-1)

Comment:

“We cannot have these oil spills happen ever again! Future generations of Americans will look back at this time to see if we took action or just sat on our hands and did nothing.” (EPA-HQ-OAR-2009-0923-2092-2)

Comment:

“We can no longer allow the the oil and gas industries to regulate themselves. It is quite evident that they will cheat anyway possible to increase their bottom line.” (EPA-HQ-OAR-2009-0923-2093-1)

Comment:

“Please, no more special favors. No more government in bed with private industry!” (EPA-HQ-OAR-2009-0923-2094-2)

Comment:

“Oil has proven, as has all business, that it CANNOT police itself. For the good of ourselves and any posterity, if there is to be one, act now to end big oil's free ride.” (EPA-HQ-OAR-2009-0923-2097-1)

Comment:

“We must make the oil and gas industry toe the line and act as responsible world citizens.” (EPA-HQ-OAR-2009-0923-2098-1)

Comment:

“If we have learned anything from the financial meltdown, the Massey mine disaster and now the BP debacle is that now is the time to rein in the run-away Bush era laissez-faire policies. Obviously this industry does not have our best interests in mind or BP would not have cut corners and would have taken every precaution imaginable to prevent such an accident. Instead, employees died and our environment in the gulf is trashed and numerous people's lives are now turned upside down. Does this sound like an industry that is really able to self regulate itself? Does this sound like an industry that is actively seeking to do no harm? Or does this sound like corporate greed yet once again. And once again Joe public has to pay the price for their reckless behavior. I say it is time that we all know what they are up to and that they too must become transparent with their green house emissions. It is time for there to be an accounting. It is time for us to know what has been hidden from us for too long.” (EPA-HQ-OAR-2009-0923-2099-1)

Comment:

“MAY THE TRUTH PREVAIL. THAT IS WHAT WE NEED IN AMERICA RIGHT NOW AS THERE ARE FORCES THAT ARE OUT THERE SABOTAGING AND PREVENTING IT FROM BEING KNOWN. MONEY AND POWER SHOULD NOT TAKE PRECENDENCE OVER THE AMERICAN PUBLIC. SHOW US THAT YOU HAVE THE BALLS TO STAND UP TO THEM AND SHOW YOU ARE FOR AMERICANS. YES!! LET US SEE WHAT YOU ARE MADE OF AND WHAT YOUR PRIORITIES ARE!! FOR TRUTH OR FOR A SELL OUT. THAT'S WHAT IT BOILS DOWN TO.” (EPA-HQ-OAR-2009-0923-2101-1)

Comment:

“PROSECUTE BP!” (EPA-HQ-OAR-2009-0923-2102-1)

Comment:

“IN THE NAME OF JESUS CHRIST, PLEASE FREEZE BP'S ASSETS NOW, TO PAY FORTHE DAMAGE.

GOD IS WATCHING YOU.” (EPA-HQ-OAR-2009-0923-2103-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding inthe Gulf, it is that the oil and gas industry must be heldaccountable.” (EPA-HQ-OAR-2009-0923-2104-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding inthe Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2105-1)

Comment:

“BP should be held accountable. Now we the taxpayers have to dish outmoney to help clean the waters, save animals, and plants. BP has themoney to clean up this mess and HELP restore wildlife and flora tonormalcy.” (EPA-HQ-OAR-2009-0923-2105-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding inthe Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2106-1)

Comment:

“June 2nd 2010 and over 40 days after the Gulf of Mexico oil spill by BPfrom a Shell Oil Facility in the Gulf of Mexico.

"Every part of the earth is sacred to my people. Every shining pineneedle, every sandy shore, every mist in the dark woods, every meadow,[and] every humming insect... are holy in the memory and experience ofmy people." By Chief Seattle

As I watch the news and see the dead sea turtles, pelicans, fish anddolphins on the sandy beaches that I have walked, and hear on the radioabout all the dead birds that have washed ashore I am

angered beyond belief and am reminded of a quote from Chief Seattle during my college days at Alaska Pacific University. There is no longer trust when it concerns those in control of big oil companies promoted to six figure positions, the U.S. government regulators and/or senators and representatives who have been voted into key positions; or the governors of the Gulf Coast and East Coast states who have supported in the past, present and/or future off shore drilling exploration. Greed and corruption is all that I see. BP's CEO says it's not their fault and they appear to be helpless in stopping this disaster. Politicians are now starting to think about changing their original decisions, and the government stands by with EPA regulations that were lowered during the Bush Administration. I have to ask why? Why has President Obama been so easily swayed to accept current conditions and reportedly supports more offshore drilling? Why have so many turned away from the truth? Why has money become more important than survival? And, why is the tourism industry of Florida denying the reality of possible toxic consumption? If we, them or they continue to ignore the potential facts that seafood caught in the Gulf of Mexico will be contaminated, Gulf shore beaches will be thick with tar, and the smell of dead marine life and animal flesh in the air will keep everyone away from enjoying the outside decks of restaurants on the once pristine beaches along the Gulf Coast; then we are blind and deaf to the reality of it all. We, you and I must be responsible and step up to the plate and say something loud and clear, find a solution and take a stand.

I am in a very unique situation to speak out, in that, I moved to Anchorage, Alaska one year after the Exxon Valdez oil spill. And, I moved back to Tampa, Florida the year before the current oil spill in the Gulf of Mexico. I have no corporate secrets to divulge. However, two months after I moved to Alaska I was hired by a temporary agency to work for the Environmental Department of Exxon as Executive Secretary in Anchorage, AK. And, although Exxon was responsible for the Alaska oil spill they at least made an effort by paying for boat owners, residents and at least attempted to be proactive. I was also fortunate to ride in a two million dollar four passenger helicopter rented by Exxon to walk on the rocky shores of a cleaned oily beach in Prince William Sound with a couple of biologists hired by Exxon. I did see an improvement, however, the oil slick lines from changing tide levels were still visible on the rocks; and from the air I saw oil slicks that were still contained by big yellow synthetic holding booms where Eagles nested and Orca pods swam.

Toward the end of my assignment, and Exxon leaving behind the clean-up efforts to Alaskans a cruise was offered to all employees contracted out to Exxon. However, prior to the boat ride we were presented with skulls of Otters that were identified by their rather large teeth; and lectured that the creatures were really not all that cute and cuddly. I would most likely have more to say on the matter. However, after the long bus ride to Portage to board the early morning passenger train to Whittier, AK on Prince William Sound the weather turned cold and foggy so we didn't actually see what was advertised by Exxon regarding the clean-up efforts by a variety of workers hired by Exxon.

What did get my attention for the most part was the ugly town of Whittier, AK. It looked like a man-made junk yard where people actually lived in a couple of very tall condos next to a couple of abandoned buildings that one would see along the east coast of Florida, only uglier. I asked myself, how could people live like this in what was obviously a dumping ground of rusted mechanical equipment and where hundreds of old tires were left to rot in the winter weather in what should have been a picturesque landscape scene that I would have loved to have painted. After eight months living again in sunny Florida, and finally enjoying the sandy white beaches that I longed for the past 20 years I am again faced with an disastrous oil spill and fighting for a cause. On February 13th, 2010 I stood on a white sandy beach in the St. Petersburg area holding hands with other concerned citizens to make a statement that off shore drilling was not acceptable. And now the reality will hit our shores with toxic waste that could have been prevented, by an international oil company that could have spent a little extra money to make sure that all precautions were addressed. And, now this same company will be fined, people will lose their livelihoods, the delicate ecosystem is in serious peril, Florida tourism will come to a screeching halt and more jobs will be lost.

I have an advantage over most residents of Florida; and that is that I have lived on the south coast, east coast, north coast and now the west coast of Florida. And, have experienced firsthand the problem with off shore drilling. If you ever visited the east coast of Florida and walked on the beaches of West Palm Beach about 40 years ago you would have arrived home only to find black sticky tar between your toes that only comes off with either lighter fluid or nail polish remover. I don't know what the answer is, but I do know that off shore drilling should not be encouraged to occur along the coastal shores, estuaries and beaches of the U.S.A. And, that big oil companies who already occupy platforms in the Gulf of Mexico should not be allowed to drill or extract oil without proper and modern failsafe measures put in place. And, I will do what I can and say what needs to be said to those who will listen.

By Debbie Sierchio, wife, mother, daughter, sister, niece, student, extensive traveler, employed and concerned citizen living in the United States of America.” (EPA-HQ-OAR-2009-0923-2106-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2107-1)

Comment:

“As a retired EPA career employee, this has special significance. Please continue to rebuild the Agency's credibility!” (EPA-HQ-OAR-2009-0923-2107-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2108-1)

Comment:

“Any so-called "monitoring" of the industry is meaningless unless all aspects of it are accounted for. BP flagrantly ignored warnings from its own people, secure in the knowledge that they might receive no more than a slap on the wrist for gross negligence. Stop giving this industry the right to pollute and destroy. Put teeth into the legislation so it comes back to bite them.” (EPA-HQ-OAR-2009-0923-2108-2)

Comment:

“I am a grandmother, and as I look at this planet, our only planet, I wonder how we can allow men to behave like small, irresponsible children with the planet's resources?” (EPA-HQ-OAR-2009-0923-2109-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2109-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2110-1)

Comment:

“This disaster should have never happened, and we will be feeling the affects for decades. Let us make the necessary changes and laws to stop this type of disaster from ever happening again!” (EPA-HQ-OAR-2009-0923-2110-2)

Comment:

“The grim BP disaster unfolding in the Gulf teaches us that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2111-1)

Comment:

“If we have learned anything watching the grim BP disaster unfold, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2112-1)

Comment:

“If we have learned anything watching the grim BP disaster unfold, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2113-1)

Comment:

“If I were in charge I would have every CEO from BP sitting on the gulf of Mexico breathing in the fumes of their oil spill and chemicals until they clean it all. Those people who caused this mess should be the ones getting the horrible headaches and compromised health. They should be the ones having their lives torn apart by this not the fishermen, animals, and anyone who lives in the turmoil. Make them take responsibility for their mistakes! Make them have to follow every step and guideline you can think of and then some so this never happens again!” (EPA-HQ-OAR-2009-0923-2113-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2114-1)

Comment:

“As a member of the Naval Air Reserve in the 70's-80's we were tasked to fly scientists to map the extent of the Campeche oil slick in 1979. I can personally attest to the stench, pollution, and loss of ocean life. In those intervening years, apparently nothing has been done to hold the drillers responsible for the calamitous damage that their mistakes cause.” (EPA-HQ-OAR-2009-0923-2115-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2115-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2116-1)

Comment:

“The President should not be afraid of the oil industry.” (EPA-HQ-OAR-2009-0923-2116-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2117-1)

Comment:

“BP Oil has shown complete disregard for the destruction of the precious wetlands and their animal habitats that they are destroying, by clearly NOT having a plan for stopping a spill of this magnitude. They continue to hide important information and continue to fail at plugging the hole from which this toxic oil is spewing. They have already caused horrific damage to the livelihoods of those living in those gulf towns. Hold them accountable by making them report greenhouse emissions. Don't let the lobbyists win! Show the American people that the EPA under Obama cares about the people of this country. HOLD BIG OIL AND GAS ACCOUNTABLE!!” (EPA-HQ-OAR-2009-0923-2117-2)

Comment:

“It is imperative that the oil and gas industry must be held accountable for using the highest level of safety and taking full accountability in the wake of disasters.” (EPA-HQ-OAR-2009-0923-2118-1)

Comment:

“Too many secrets out there! Honesty and transparency are essential. We, the People, want it and we deserve it. I, for one, am tired of corporations getting away with things just because they are good at keeping secrets and lying.” (EPA-HQ-OAR-2009-0923-2119-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2119-2)

Comment:

“BANKRUPT BP!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-2120-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2120-2)

Comment:

“If ever our environment is in need of protection, that time has arrived thanks to BP and Transocean. I am utterly heartbroken over the oil spill disaster that continues to despoil the Gulf Coast. This disaster is too large for any corporation or government to clean up. Perhaps we will make a good dent in it, but ultimately the Gulf will have to clean itself up through natural processes.” (EPA-HQ-OAR-2009-0923-2121-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2121-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2122-1)

Comment:

“The problems with the fossil fuel industries, Oil, Gas and Coal are so vast and frequent a minor item like a 100,000 barrel oil spill from the BP's mismanaged Alaska pipeline goes all but unnoticed and virtually unreported by the American corporate controlled free press. What a destructive travesty unconstrained corporate greed has brought down upon the world. Have we learned anything yet? Must we await the destruction of life, as we know it, doomsday, before we get it? Will democracy prevail? Or will it come to being forced to bring the greed driven insane madness to an end through force of arms?

Self regulating free market corporations; are an oxymoron. They do not, can not, will not exist in our present free wheeling "greed is all there is" unregulated socially brain washed dollar frenzied mentality. Greed and plunder are their only common denominators. Life, ecology, humanity, civic reasonability, future, fair play, nation none of these exist in the lexicon of the elitist oligarchy of the 1%. Without oversight and regulation they are more akin to

kindergarteners given unsupervised free reign of the play ground that includes an Olympic swimming pool, slides, swings and open bonfire for cooking all the hotdogs and marshmallows they want plus unlimited soda and icecream.” (EPA-HQ-OAR-2009-0923-2122-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2123-1)

Comment:

“Enough is Enough stop the crooked contracts in safety laws for oil drilling NOW.” (EPA-HQ-OAR-2009-0923-2123-2)

Comment:

“Enough is enough when it comes to the lax control of our energy industries.” (EPA-HQ-OAR-2009-0923-2124-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2124-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2125-1)

Comment:

“Please take the right action to protect our precious environment!” (EPA-HQ-OAR-2009-0923-2125-2)

Comment:

“I thought that we had learned when Dick Cheney had the energy industry behind closed doors writing the Bush Administrations policies what was the result of having a lack of sunshine on these issues.” (EPA-HQ-OAR-2009-0923-2126-1)

Comment:

“Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2126-2)

Comment:

“Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2127-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2128-1)

Comment:

“Please help to hold these companies accountable!” (EPA-HQ-OAR-2009-0923-2128-2)

Comment:

“Our major industries via their lobbyists, buy their way out of accountability for the pollution they create and the damage their wreak upon our collective environment. CAFO's are given seven years to comply with environmental regulations, and then are still not held accountable for the air/water pollution they cause in almost all places they are found. ALL industries and financial institutions NEED regulation, and also NEED to be held ACCOUNTABLE when they fail to comply.” (EPA-HQ-OAR-2009-0923-2129-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2129-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2130-1)

Comment:

“And while you're trying different ways, why not give Kevin Costner's idea a chance??!” (EPA-HQ-OAR-2009-0923-2130-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2131-1)

Comment:

“You have the Clean water Act. Use it to the fullest extent. Show polluters like BP that their shortcuts to profit will no longer be tolerated, on or off shore. Make them pay for every single cent of lost coastline and income.” (EPA-HQ-OAR-2009-0923-2131-2)

Comment:

“I am not permitted to burn off my garden unless the fire department is standing by. My garden hose is not considered sufficient. Should not off shore drilling take the same safety precautions? Yes we take a chance everytime we drive on the highway. The scope of the disaster is miniscule compared to destroying the Gulf Coast and so many people's lives. Stop giving any tax money or subsidies to big oil and coal companies. Stop exempting them from regulations.” (EPA-HQ-OAR-2009-0923-2132-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2132-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2133-1)

Comment:

“We have worked hard to get our waters clean and for the most part we were succeeding. This must get cleaned up and we must do all to see that these things never happen again.” (EPA-HQ-OAR-2009-0923-2133-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2134-1)

Comment:

“BP and other polluting corporations must not be allowed to trash our precious waters and soil and air; they must be brought to justice. The people of this country, including myself, are outraged at the blatant abuses by these corporations. You must act and act courageously to bring these abusers to justice. A slap on the wrist is not sufficient.” (EPA-HQ-OAR-2009-0923-2134-2)

Comment:

“One of the main things I have learned watching the horrific BP disaster unfolding in the Gulf, is that the oil and gas industries cannot be allowed to continue without stringent and enforceable regulations. In addition to being regulated, they must also be held responsible for the damage they cause and financially accountable to make reparations when their endeavors go awry.” (EPA-HQ-OAR-2009-0923-2135-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2136-1)

Comment:

“Do not let the massive bribery, greed, corruption and stupidity endemic throughout our government to allow this industry to escape culpability for its follies. I am well aware that one of the root causes of incidents of this kind is the desire of oil company executives to maximise their personal financial remuneration by skimping on the operational costs necessary to avoid disasters of this kind. Once again we appear to have a case of "Take off your engineering hat and put on your management hat". This disgustingly unethical behaviour must be squelched somehow, one way to do so is to punish, severely, such unethical transgressions when they lead to harm done. It is long past time to bring to justice corporate executive officers and directors who abandon their duties to society in favour of money in their own pockets” (EPA-HQ-OAR-2009-0923-2136-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2137-1)

Comment:

“It is time to make the smart and difficult choices for the safety of our future and generations to come. We need to wean ourselves off oil yet we need to provide affordable options for alternative sources of energy.” (EPA-HQ-OAR-2009-0923-2137-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2138-1)

Comment:

“Not only do they need to be held entirely accountable, we need to set standards- high standards with the expectation of them being met asap. This is all the planet(water, land, air) that we have, our life support system. Please put that first instead of the money that these companies have been making. Provide the necessary leadership for this now, our government is capable of that.

Thank you for your work, I know this has been very difficult.” (EPA-HQ-OAR-2009-0923-2138-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2139-1)

Comment:

“Short of banning off shore drilling I hope that at the very least regulations will be tighter and adhered to. This is an accident that should never have happened and would not have if BP had been held accountable and held to strict standards. This should NEVER happen again.” (EPA-HQ-OAR-2009-0923-2139-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2140-1)

Comment:

“I'm held responsible for everything I do. How come the oil industry gets off the hook?” (EPA-HQ-OAR-2009-0923-2140-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2141-1)

Comment:

“We can not continue in a situation where the laws are more for show than enforcement” (EPA-HQ-OAR-2009-0923-2141-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2142-1)

Comment:

“This disaster should not have happened - making the oil industry accountable will certainly help in the future.” (EPA-HQ-OAR-2009-0923-2142-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry and the regulators that are supposed to be on top of this MUST be held accountable.” (EPA-HQ-OAR-2009-0923-2143-1)

Comment:

“Once this information becomes available, the EPA MUST have the political will to act.” (EPA-HQ-OAR-2009-0923-2143-2)

Comment:

“The oil and gas industry should be held accountable for reporting its greenhouse gas emissions. The EPA is proposing to include the offshore-- and onshore -- oil and gas industry in the reporting system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2144-1)

Comment:

Comment:

“I strongly support the use of rigorous, detailed, direct pollution measurements of the oil and gas industry's greenhouse gas emissions. They should be immediately included in the EPA's reporting system.” (EPA-HQ-OAR-2009-0923-2149-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2150-1)

Comment:

“Fossil fuel is a fossil, and is challenging our very existence. Healthy oceans are critical for our health. Big energy holders are holding us back from real sustainable energy. Tides, geothermal, vegetable oil, to name a few. Thank you for your influence for our global problem.” (EPA-HQ-OAR-2009-0923-2150-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2151-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2152-1)

Comment:

“Archeology tells us that as a species, we survived previous climate changes by ADAPTING to them. We will not win a fight with nature. Our addiction to oil is not worth destroying our home. Thank you for your work to ensure its survival.” (EPA-HQ-OAR-2009-0923-2152-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2153-1)

Comment:

“I am a PhD geologist who once worked in the oil and gas industry. I have spent many hours on offshore exploratory drilling rigs.” (EPA-HQ-OAR-2009-0923-2153-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2154-1)

Comment:

“I support the efforts of the EPA to keep our planet green.” (EPA-HQ-OAR-2009-0923-2154-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2155-1)

Comment:

“Accountability should include stringent, enforceable consequences to violations.” (EPA-HQ-OAR-2009-0923-2155-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable and we must find safer forms of energy and implement stronger energy saving measures as quickly as possible.” (EPA-HQ-OAR-2009-0923-2156-1)

Comment:

“The American people are angry about business as usual in Washington, which includes special favors and exemptions for moneyed interests. This is corruption, and it has to stop! Our world is falling apart, and if there are to be any solutions, we need to start with honesty and a level playing field.

Please don't allow any exemptions to the greenhouse gas reporting rule -for BP or for any other major source of pollution.” (EPA-HQ-OAR-2009-0923-2157-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2158-1)

Comment:

“Stop the oil and gas industry from hiding the mess they are making of our planet. Make them confess what they are doing.” (EPA-HQ-OAR-2009-0923-2158-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2159-1)

Comment:

“We know that half of the truth is not the whole truth. They can admit a little and forget a lot. This must be challenged and recorded.” (EPA-HQ-OAR-2009-0923-2159-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2160-1)

Comment:

“PLEASE..HOLD THE GAS AND OIL INDUSTRY ACCOUNTABLE!” (EPA-HQ-OAR-2009-0923-2160-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2161-1)

Comment:

“I live in Florida and it is bad enough to imagine it all lost to rising seas from global warming, but this latest spill is horrendous. Make BIG OIL OBEY THE LAW!!” (EPA-HQ-OAR-2009-0923-2161-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2162-1)

Comment:

“PLEASE WORK HARD TO INCLUDE BOTH OFFSHORE AND ONSHORE FACILITIES IN YOUR TAKING CHARGE OF THE ENERGY FOR USA.” (EPA-HQ-OAR-2009-0923-2162-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2163-1)

Comment:

“Everyone I know - from California to Virginia - is outraged by the BP oil disaster and wants serious commitment from our government to hold oil corporations accountable and transition the US away from our dependency on petroleum.” (EPA-HQ-OAR-2009-0923-2163-2)

Comment:

“We can no longer allow extractive industry corporations to externalize the costs of their operations while reserving the profits for shareholders at the expense of the public and the environment.” (EPA-HQ-OAR-2009-0923-2164-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2165-1)

Comment:

“I think oil and gas companies should take full responsibility. We will probably lose wild life that may never recover, not counting all the people who will have health problems. Our ocean will never be the same, stop it before it's too late.” (EPA-HQ-OAR-2009-0923-2165-2)

Comment:

“Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2166-1)

Comment:

“THE FOLLOWING FORM EMAIL FROM EDF IS GREAT, BUT MAY I PLEASE GIVE YOU THE BOTTOM LINE HERE: GLOBAL WARMING IS REAL ~ IT'S DESTROYING SPECIES ALREADY AND WILL SOON TRANSFORM THIS WORLD INTO A HORRIBLE PLACE TO LEAVE OUR CHILDREN ~ AND YOU HAVE THE POWER TO STOP THAT FROM HAPPENING. PLEASE USE YOUR POWER FOR THE HEALTH AND HEALING OF OUR BEAUTIFUL PLANET AND ALL HER CHILDREN BY HOLDING THOSE WHO CARE ONLY ABOUT THEIR OWN SELF-INTEREST ACCOUNTABLE.” (EPA-HQ-OAR-2009-0923-2166-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2167-1)

Comment:

“Also, if this means your agency will need a bigger budget to hire more people to monitor and inspect, then so be it. You have my support to go to Congress and the President to ask for "enforcers" ! Please make the agency do what it is supposed to do.” (EPA-HQ-OAR-2009-0923-2167-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2168-1)

Comment:

“It isn't the people or the cars that cause so much pollution. It's the large companies that lobby for special rules and favors, and get away with massive pollution because of their money and bribes. Please close the loopholes that permit this!” (EPA-HQ-OAR-2009-0923-2168-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2169-1)

Comment:

“The oil and gas industry truly needs to be held accountable, and well as the government agencies that approve permits, oversee, and regulate the same industry.” (EPA-HQ-OAR-2009-0923-2169-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2170-1)

Comment:

“I want to see NO MORE Special Privileges for ANY corporations, large or small! The stakes on this current disaster are so huge and will be causing worldwide ramifications. It is time for the people of the world to demand AND GET full accountability and a complete and ENFORCED set of stringent rules set up for ALL companies.” (EPA-HQ-OAR-2009-0923-2170-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2171-1)

Comment:

“Your kidding right! Are you trying to say that you can't see that Big Oil and Big Business lies whenever it is convenient and whenever the bottom line is involved?” (EPA-HQ-OAR-2009-0923-2171-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2172-1)

Comment:

“My family is willing to pay more for clean energy.” (EPA-HQ-OAR-2009-0923-2172-2)

Comment:

“I strongly support the EPA decision to require the oil and gas industry to track and report its massive global warming pollution emissions under the mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-2173-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2174-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2175-1)

Comment:

“I do not understand the greenhouse gas and pollution problems, but I ask that the government officials that have been appointed to take care of these do their duty and what they are getting paid for from our taxpayers funds. I have been upset with the Secretary of the Interior Salazar and the Director of the BLM Abbey with the lack of compassion and cruelty they are inflicting on our wild horses and burros on our western public lands and gives all of others a lack of confidence.” (EPA-HQ-OAR-2009-0923-2175-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2176-1)

Comment:

“What's happening in the Gulf right now is criminal. We should be holding the oil industry's feet to the coals to pay for the results. We should also make them include the costs of pollution (including CO₂) in the price of their product.” (EPA-HQ-OAR-2009-0923-2176-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2177-1)

Comment:

“It is time for this administration to put some muscle into its words about protecting our environment. It is long past time for holding the oil & gas industry accountable for the damage

they are doing to our environment. I will await the EPA decision on this matter with great interest.” (EPA-HQ-OAR-2009-0923-2177-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2178-1)

Comment:

“clean air is the right of every one on this planet. Please do not let big oil destroy the air along with other businesses. You can sell water that is clean when most water sheds are damaged. You cannot sell clean air.” (EPA-HQ-OAR-2009-0923-2178-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2179-1)

Comment:

“I SHOULDN'T EVEN NEED TO SEND THIS MESSAGE TO YOU! MY GOD, IF YOU CAN'T SEE THE TOTAL REALITY OF WHAT OUR COUNTRY HAS BECOME (TRULY ONE EVERY LEVEL THERE IS!!!) YOU DO NOT BELONG IN YOUR JOB!!!” (EPA-HQ-OAR-2009-0923-2179-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2180-1)

Comment:

“This is critical to the survival of our world as we know it.” (EPA-HQ-OAR-2009-0923-2180-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2181-1)

Comment:

“The fact that almost this exact oil spill happened 31 years ago by the same drilling company under a different name in the same Gulf of Mexico is appalling. Have we learned nothing from history? How has my government let this happen again?! How can the EPA call themselves an effective agency if they do not ensure companies like big oil have the technology to clean up the mess they make if one happens to occur? Why does it take a disaster of these proportions to urge big oil to clean up their act and make their rigs environmentally safe? The oil companies have not been required to improve their emergency disaster technology but have made vast improvements to their drilling capabilities? How can the EPA let this be? Enough is enough. The oil companies have had their chance to clean up their act and failed. The same methods of clean up that failed 31 years ago are failing again today. We, as Americans, now demand that oil be taken off the energy table all together. We want clean, renewable energy. And we want it NOW! The future is solar and wind. The future is electric. The future is not covered in black, sticky, hazardous oil.” (EPA-HQ-OAR-2009-0923-2181-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2182-1)

Comment:

“We are so greedy, we are willing to destroy the planet. The future of the planet depends on us now to right this wrong.” (EPA-HQ-OAR-2009-0923-2182-2)

Comment:

“If we have learned anything watching the tragic and possibly unimaginably disastrous BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable” (EPA-HQ-OAR-2009-0923-2183-1)

Comment:

“What say you that, instead of corporate interests, the EPA turn its muscle to protecting the broad interests of the citizenry of the country in the matter of regulating the oil and natural gas industry?” (EPA-HQ-OAR-2009-0923-2183-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2184-1)

Comment:

“I_ also hope you make sure BP is totally responsible for the cost of clean up for the oil spill in the gulf.” (EPA-HQ-OAR-2009-0923-2184-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2185-1)

Comment:

“Stand strong Administrator Jackson. The future depends on your courageous will and fortitude.” (EPA-HQ-OAR-2009-0923-2185-2)

Comment:

“I'm writing to you as a human being... a resident of this magnificent earth. And how frustrating - and frightening -- to know that the earth on which we rely for our very lives is being polluted and slowly killed. What will we do when we realize we've finally reached the point beyond which there is no return. I understand that is a strong statement, but just how much can we pollute our air, land, fresh water lakes and streams, and oceans before we are unable to correct the damage we've done?”

The BP oil disaster should be a wake-up call and an urgent reminder of the need for committed and aggressive alternative and renewable energy resource development.

Under no circumstances should any similar drilling permits be issued or allowed to proceed (if already issued) until: 1) a thorough independent investigation into the cause of this devastating event is performed; 2) an independent inspection of all existing wells and rigs is performed; and until the industry can demonstrate exactly how they would be able to successfully stop a leak should (God forbid!) a similar event take place in the future.” (EPA-HQ-OAR-2009-0923-2186-1)

Comment:

“Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2187-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2188-1)

Comment:

“All these affect the health and welfare of the American public and we need to be informed and our leadership accountable for strong and proper supervision and monitoring and keeping the public informed of all violators and fines or penalties and worst offenders or those who get out through legal maneuvering or loopholes and technicalities. We want safety and accountability not legal games that put the public at risk or individuals and communities at risk for illness and contamination of food, air, and water resources or economic resources that support families by industry or industry practices that exploit all of us and their workers in high risk and high disaster potential pursuits like oil and gas drilling and coal and oil shale extraction processes. We have had enough. Import what we use or require reduced use and alternative energy sources and support home site energy generation through solar or small roof top wind turbines and efficient vehicles.” (EPA-HQ-OAR-2009-0923-2188-2)

Comment:

“We need to learn from this current BP disaster - don't let the oil and gas industries lobby their way out of greenhouse gas reporting again. They did it last year, but now the EPA has a chance to right the wrong and track the massive global warming emissions from these industries. I urge you to make the pollution measurements strong and detailed and include the emissions from the oil and gas giants as soon as possible.” (EPA-HQ-OAR-2009-0923-2189-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2190-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2191-1)

Comment:

“We must act now to save the oceans and its creatures. We endanger our economic status and our security if we do not.” (EPA-HQ-OAR-2009-0923-2191-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2192-1)

Comment:

“It is time to take responsibility and preserve our planet's natural resources. This is where we live; we need to stop poisoning ourselves in the name of economic gains. Clean air is essential in order to live; that is the bottom line.” (EPA-HQ-OAR-2009-0923-2192-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2193-1)

Comment:

“The oil and gas industries must be held to a more rigid accountability. They have more than enough financial resources to accomplish this... and the necessary additional jobs would be a benefit to the economy.” (EPA-HQ-OAR-2009-0923-2193-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2194-1)

Comment:

“It is horrifying to know that these behemoths like BP can destroy so much of the planet and continue to want nothing more than secrecy so that they can continue to risk our precious planet. They need to know that the coast lines belong to ALL of us and Nature too. The sooner the oil companies are put out of business, the sooner we will start finding sane solutions to the energy problem.” (EPA-HQ-OAR-2009-0923-2194-2)

Comment:

“I hope you share my view that we must hold the oil and gas industry accountable.” (EPA-HQ-OAR-2009-0923-2195-1)

Comment:

“The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2196-1)

Comment:

“The unspeakable damage that the BP disaster in the Gulf will wreak on the future of our country is yet to be reckoned but it is incalculably more damaging to the security of our children than any terrorist attack so far or the economic downturn. The people who chose to risk this kind of irremediable disaster only to get more money or to stay in power a bit longer have to pay at least part of the price that they are exacting from everyone on the planet. These people made deliberate choices that resulted in the destruction of 11 workers, whole industries for decades or centuries to come, and not least, unknown damage to life in the ocean and the shore.

We have a choice to not risk further destroying the oceans on which we ALL depend far more than we depend on the profits from petroleum. We must wean ourselves from this limited, poisonous, and doomed energy source as soon as possible. The up-front costs to develop new energy sources and to conserve energy will be infinitely less than the final costs we pay if we continue in this blind pursuit of a few bucks more in the extreme short run.” (EPA-HQ-OAR-2009-0923-2196-2)

Comment:

“This earth has been here for a long time. I'm of the impression she knows what she's about. You men are breaking things that can't be fixed. You are a cancer.

You need to play by the rules, or the whole ship sinks, not, unfortunately, just you.” (EPA-HQ-OAR-2009-0923-2197-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2198-1)

Comment:

“Future generations will appreciate the sacrifices we make today to ensure a sustainable economy for them.” (EPA-HQ-OAR-2009-0923-2198-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2199-1)

Comment:

“This is essential to the well-being of our grandchildren.” (EPA-HQ-OAR-2009-0923-2199-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2200-1)

Comment:

“Make BP (Biggest Polluter) pay, pay, pay. Send them to jail. Their carelessness and greed has killed 11 men. They have killed countless animals. IMPRISON ENVIRONMENTAL CRIMINALS. Fines don't work. They sleaze out of them and then laugh.

MAKE THEM PROVIDE HAZMAT SUITS AND WELL-WORKING, HIGH QUALITY RESPIRATORS for all those working to try to undo their colossal toxic mess. The out-of-touch CEO who ordered the workers not to wear respirators in front of the cameras should be imprisoned. Something about not wanting the public to see how bad their colossal mess really is. The dispersant, Corexit, which they used to try to hide their mess, will give all those workers cancer.

IMPRISON ENVIRONMENTAL CRIMINALS. Make them pay, pay, pay. And not only with money.” (EPA-HQ-OAR-2009-0923-2200-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2201-1)

Comment:

“PLEASE, PLEASE do what you MUST to fix the loophole that allows these SOB's to get away with what they are doing to our world.” (EPA-HQ-OAR-2009-0923-2201-2)

Comment:

“If we have learned anything watching the BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2202-1)

Comment:

“Please close the many loopholes they use to gain profit, and pay a few officials as well.” (EPA-HQ-OAR-2009-0923-2202-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2203-1)

Comment:

“I am writing to the government agency charged with the mandate to protect our environment against ANY and ALL polluters. This includes-most especially, those super rich mega corporations like British Petroleum, who consider polluting and paying a penalty part of the cost of doing business.

These major corporations also hire the best lawyers in the business to investigate and discover for them the "legal" loopholes in the law which allow them to pollute and get away with it. In such cases, the spirit of the law is trampled while maintaining an adherence to the letter of the law.

THIS MUST STOP OR WE WILL LEGALLY DESTROY THE VERY PLANET UPON WHICH WE RELY TO EXIST!!! I URGE THE EPA TO INVESTIGATE, DISCOVER AND CLOSE EVERY LOOPHOLE WHICH MIGHT BE USED TO ALLOW COMPANIES LIKE BP TO POLLUTE WITH IMPUNITY!!!” (EPA-HQ-OAR-2009-0923-2203-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2204-1)

Comment:

“I am so angry that our administrations have such a lax system as to allow the oil companies to basically proceed in a cavalier manner that we now find ourselves in this disaster. Is there no integrity left at all?! I want to see heads roll on all levels & procedures tightened up. No amount of money is going to remedy this ecological situation. This should never have happened but if irresponsible government needed any more evidence let this be the beginning of using our heads - our greed.” (EPA-HQ-OAR-2009-0923-2204-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2205-1)

Comment:

“If Norway can implement far safer and workable standards, we can too we have MUCH more to lose! Implement controls for this industry and regulate them now, please.” (EPA-HQ-OAR-2009-0923-2205-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2206-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2207-1)

Comment:

“ALL citizens & organizations should be subject to the same rules. NO FREE PASSES.” (EPA-HQ-OAR-2009-0923-2207-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2208-1)

Comment:

“The future of the Earth's health is at issue. We simply cannot expect the Earth to endure continued pollution of the oceans, land, and air. It is time for you to step up and do what is right for the Earth, not for Big Oil.” (EPA-HQ-OAR-2009-0923-2208-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2209-1)

Comment:

“I believe it is too late already; we have killed ourselves.” (EPA-HQ-OAR-2009-0923-2209-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2210-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2211-1)

Comment:

“Please make sure your agency does what its name implies - protect our environment.” (EPA-HQ-OAR-2009-0923-2211-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2212-1)

Comment:

“This disaster should be a wake up call for the whole world, and especially the USA. We cannot keep wreaking havoc on our natural resources.” (EPA-HQ-OAR-2009-0923-2212-2)

Comment:

“DUH! Listening to lobbies is why this was not done in the first place!

I don't care how much money BP (and all the rest of the oil industry) may have donated to the political candidates including the president or how much they lobby - the welfare of this country and its citizens comes first. And there should be NO CAP on damages BP may have to pay for their selfish, short-sighted, and careless handling of the process from the beginning.” (EPA-HQ-OAR-2009-0923-2213-2)

Comment:

“Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.

This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.

I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2214-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2215-1)

Comment:

“I'm tired of big business getting away with dangerous and illegal activities just because they have lots of money to throw at politicians. We all must be held accountable for polluting the environment. Carbon emissions must be capped and taxed; only then will we become aware of the true financial cost of carbon fuels. Only then will we have the incentive to get serious about clean energy and allocate financial and other resources to making clean energy abundant and available throughout the U.S. Only then can the U.S. become energy leaders and be in a position to export our energy and expertise and turn a financial profit as well as an environmental profit. Soon we need to start doing the right thing instead of just the convenient or immediately profitable thing!!” (EPA-HQ-OAR-2009-0923-2215-2)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2216-1)

Comment:

“Finally the oil industry can no longer hide the sloppy, uncaring way they go after oil. It's all out there for anyone who has a television to see. Let's make them pay for the mess in the Gulf but don't stop there close those loopholes and collect what is owed to the government for using our natural resources to get rich.” (EPA-HQ-OAR-2009-0923-2216-2)

Comment:

“No more exemptions! Big Oil and Big Gas need to be treated like the highly profitable and mature businesses that they are. Accountability is a must. No more favors, no more easy outs.

Last year, Big Oil and Gas lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision.

I beg you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible." (EPA-HQ-OAR-2009-0923-2217-1)

Comment:

"If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-2218-1)

Comment:

"Please don't cave in." (EPA-HQ-OAR-2009-0923-2218-2)

Comment:

"If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable." (EPA-HQ-OAR-2009-0923-2219-1)

Comment:

"Do what is right and stop protecting big oil and industry at the expense of our environment and our future." (EPA-HQ-OAR-2009-0923-2219-2)

Comment:

"In view of the BP disaster unfolding in the Gulf, the time has come to hold the oil and gas industry accountable." (EPA-HQ-OAR-2009-0923-2220-1)

Comment:

"Please require the oil and gas industry to be part of the pollution emission reporting system. We always hear that "oil" is a dirty business." Let's be brave enough to see if this is true and if so, how true - so the country can properly address the issue.

We're all in this together. Let's act like it." (EPA-HQ-OAR-2009-0923-2221-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2222-1)

Comment:

“For my part, I am cutting down on my personal gas and oil consumption as a commitment to what I believe is irresponsible use of natural resources by BP. Although I will do what I can, we rely on the EPA to provide the systematic structure to hold oil and gas companies responsible. Together we can provide a better future to our children's children. Please help.” (EPA-HQ-OAR-2009-0923-2222-2)

Comment:

“Please, no more favors for big oil companies, or big corporations at all for that matter. They are ruining our country!! Our economy, our oil, and it seems like the only recourse we have are these little letters. Not much hope here, but you have to try.” (EPA-HQ-OAR-2009-0923-2223-1)

Comment:

“If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2224-1)

Comment:

“The entire scene on the beach was just plain insulting to our intelligence. A bunch of guys picking up pea size tar balls. Big white bags with maybe a pint or two of tar in the bottom of the bags. Did they really think this was going to make anyone take them (BP and the government) seriously? It's a joke and the joke is on the American people.” (EPA-HQ-OAR-2009-0923-2225-2)

Comment:

“HOLD THEM VERY ACCOUNTABLE!!!!!!” (EPA-HQ-OAR-2009-0923-2226-1)

Comment:

“The governments of Brazil and Norway require acoustic valves to prevent problems such as the blowout on the deep water Horizon but the United States and United Kingdom do not. This is just one more example how the lack of regulation and controls have devastated the environment and

lives. It is relatively inexpensive, compared with the huge cost the taxpayers are now paying to clean up BP's mess.” (EPA-HQ-OAR-2009-0923-2227-1)

Comment:

“Let's work together to counteract the negative influence of corporations in our country and world which do not care about the ramifications of their actions but only care about making tons of money.

We must take back the country from the control of corporations and hold them accountable for their actions. Prevention of disasters such as in the Gulf of Mexico is of the utmost importance. Many of us are ready, eager, and already trying to change our life-styles so that we need to use oil and coal less and less. We need the government and especially your agency to help us be effective and encourage a shift in perspective, attitude and strategy. Thanks for your consideration of this issue. Please know that there are many Americans who want leadership and regulation of polluting companies. You can help!” (EPA-HQ-OAR-2009-0923-2228-1)

Comment:

“Please, please, please hold the corporations accountable for the consequences of their actions and failures. Our country is being poisoned by the corrupt practices of not overseeing regulations designed to protect us and to prevent such a catastrophe. Don't let big money dictate a policy that is not in the best interests of the citizens of our country.” (EPA-HQ-OAR-2009-0923-2229-1)

Comment:

“We were blinded last year by the oil and gas industry lobbying. Now the BP disaster has given all of us hindsight with 20/20 vision. Please don't let the oil and gas industry blind us again. The massive environmental and economic consequences of the BP disaster make it mandatory to finally hold the oil and gas industry accountable, starting with mandatory rigorous measurement of greenhouse gas and honest mandatory reporting. The voters have a right to know the risks that oil and gas companies are subjecting them to, like the BP disaster in the Gulf.” (EPA-HQ-OAR-2009-0923-2230-1)

Comment:

“ENOUGH! STOP BIG OIL AND BIG BUSINESS FROM KILLING OUR EARTH!” (EPA-HQ-OAR-2009-0923-2231-1)

Comment:

“If Humans can make it to the moon we can stop this spill.” (EPA-HQ-OAR-2009-0923-2232-1)

Comment:

“This latest disaster lays bare the consequences of irresponsible regulation.” (EPA-HQ-OAR-2009-0923-2233-1)

Comment:

“NO more pollution by Big Oil. Fix the loophole and hold the Oil Companies accountable.” (EPA-HQ-OAR-2009-0923-2235-1)

Comment:

“Hold these companies accountable for their actions just as we citizens are.” (EPA-HQ-OAR-2009-0923-2236-1)

Comment:

“Please do the right thing and finally put the people before this dirty industry!” (EPA-HQ-OAR-2009-0923-2237-1)

Comment:

“As we witness the unfathomable tragedy in the Gulf, it is time for all of us to get the message: The oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2238-1)

Comment:

“Thank you for your service to our country.” (EPA-HQ-OAR-2009-0923-2238-2)

Comment:

“And holding it accountable is not enough. Accountability will not ensure that they do not pay for risks gone awry. Vigilant oversight is essential to prevent another disaster.” (EPA-HQ-OAR-2009-0923-2239-1)

Comment:

“This is a wake up call before corporate greed ruins all that is precious and remaining from our natural environment. please return governance from the lobbyists to the American people.” (EPA-HQ-OAR-2009-0923-2240-1)

Comment:

“As we have now lost the Gulf of Mexico we have to take stronger stands against the ungoing threats and attacks on our remaining environment and the sane voices working so hard to preserve our future from the greed of mega industries only interested in preserving their profits.” (EPA-HQ-OAR-2009-0923-2241-1)

Comment:

“We must hold the oil and gas industry accountable for the damage to the economic livelihoods of those living in the Gulf of Mexico, the wildlife and the environment.” (EPA-HQ-OAR-2009-0923-2243-1)

Comment:

“The oil and gas industry makes a hefty contribution to global carbon dioxide emissions, for example by flaring "excess" natural gas. Clearly, this contribution ought to be included in any worthwhile reporting system.” (EPA-HQ-OAR-2009-0923-2244-1)

Comment:

“What a mess we are in because of irresponsible executives. We certainly do not need to multiply offshore drilling sites. Put a cabash on that now!” (EPA-HQ-OAR-2009-0923-2246-1)

Comment:

“Why in the world would we NOT require full disclosure of any polluter -except that they just don't want us to. Good grief, can we please just begin to have the courage to do what's good for the people and the planet and FORGET about what's good for big oil and gas?!!!!!!!!!! WHAT DOES IT TAKE to get our priorities straight???” (EPA-HQ-OAR-2009-0923-2247-1)

Comment:

“We do need governmental controls over so many factions of our lives. Please know that I support active safeguards which only our leaders can impose. Please show strength in making sure action is taken here.” (EPA-HQ-OAR-2009-0923-2248-1)

Comment:

“Yes BP cut corners, and caused the most devastating spill in U.S. History, if not the worlds. Yes, they should be punished.. But let's look at it another way, it's time to employ our renewable and clean energy alternatives, plenty of them are out there and by cutting our subsidies to inept and dangerous companies like BP etc. We can bring about a new age of clean energy to the States and the World, now is the time.” (EPA-HQ-OAR-2009-0923-2249-1)

Comment:

“Its time for the oil and gas industry to pay up and clean up the damage and pollution they have cause to mother earth and future generations!” (EPA-HQ-OAR-2009-0923-2250-1)

Comment:

“Blaming BP is pointless. It's our entire carbon-based culture and economy that is responsible.” (EPA-HQ-OAR-2009-0923-2251-1)

Comment:

“As Conservation Chair of the South Bend-Elkhart Audubon Society, I write on behalf of our 700 members. We are terribly concerned about the adverse impacts of global warming on wildlife habitat, which have already begun.” (EPA-HQ-OAR-2009-0923-2252-1)

Comment:

“The only good thing that may come out of this disaster is that it is clear that the oil and gas industry must be held accountable; this is no liberal, tree-hugging point-of-view. The system must that there are rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2253-1)

Comment:

“The ways that things have been done in the past are not working. We must change the ways we deal with these matters in the future if we want to have a future worth living in. We must both require and enable the EPA to do its job of PROTECTING OUR ENVIRONMENT.” (EPA-HQ-OAR-2009-0923-2254-1)

Comment:

“No longer can we ignore safety breaches we must keep our world safe for everyone. Thank you for being part of the solution.” (EPA-HQ-OAR-2009-0923-2255-1)

Comment:

“I fully support the EPA's efforts to include all of the oil and gas industries emissions in the greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-2256-1)

Comment:

“If we have learned anything watching the grim BP/Halliburton/Transocean human and environmental murder unfolding in the Gulf, it's that the oil and gas industry must be held wholly accountable.” (EPA-HQ-OAR-2009-0923-2257-1)

Comment:

“Those who fail to meet required standards should be held criminally and financially accountable.” (EPA-HQ-OAR-2009-0923-2257-2)

Comment:

“I have great faith in the current administration and your capability to get things done. What this disaster amplifies is the need to change our ways. By all means, hold BP, TransOcean and Halliburton accountable.

PLEASE also voice the need to mobilize every American against the dangerous reliance on oil. Use this tragedy to call for a better awareness and a concerted effort to change our habits. WE caused this problem. All of us. If consumers don't feel the full price of their actions, they won't change, and neither will the corporations.” (EPA-HQ-OAR-2009-0923-2258-1)

Comment:

“Please, we need to insure these disasters never happen again, whatever that takes. As an owner of gas leases held by BP in Colorado, I know they will try to get out of all accountability possible, no matter who or what it hurts. These companies make a ton of money, they can pay to take responsibility for their mistakes and take care of the people and the environment they work with and in.” (EPA-HQ-OAR-2009-0923-2259-1)

Comment:

“It's past time the corrupt corporate influences that kidnapped our government during the Bush/Cheney regime become a government for and by the American people again. Our economic and now environmental catastrophes can all be attributed to unregulated corporate

agendas out of control.

Please represent the citizens of this country again and hold corporate plunderers accountable for their reprehensible and likely criminal practices.” (EPA-HQ-OAR-2009-0923-2260-1)

Comment:

“It is with utter horror that we see the machinations of a feckless agency in a time when it is needed the most.” (EPA-HQ-OAR-2009-0923-2261-1)

Comment:

“To come to our collective rescue this is what the EPA must do to ensure any future for our country and our planet.” (EPA-HQ-OAR-2009-0923-2261-2)

Comment:

“I am sickened to death over this disaster!” (EPA-HQ-OAR-2009-0923-2262-1)

Comment:

“Don't let BP talk their way out of this! They have taken almost NO responsibility for this horrific mess for which we see no end. Their CEO speaks as if BP is somehow detached from this "incident".” (EPA-HQ-OAR-2009-0923-2263-1)

Comment:

“I hold the EPA as accountable for this disaster as BP OIL and GAS. Your actions often in support of big oil instead of majority of Americans do not support sustainable, living conditions for our children. You should be ashamed.” (EPA-HQ-OAR-2009-0923-2264-1)

Comment:

“Protect our planet: no more sweetheart deals for the oil and gas industry!” (EPA-HQ-OAR-2009-0923-2265-1)

Comment:

“The oil companies must learn from our response to this disaster that the government values safety over everything. They must not be allowed to get away with their careless and rapacious behavior.” (EPA-HQ-OAR-2009-0923-2266-1)

Comment:

“The people and the planet need the EPA, Congress and the President to hold strong and do the wright thing for all of us. Please do not let the oil and gas industry off the hook for this or any other environmental disaster Hold them responsable for all the damages.” (EPA-HQ-OAR-2009-0923-2267-1)

Comment:

“We simply cannot allow BP and any other gas and oil industries to refuse reporting emissions. This is the Only planet we have to live in!!!” (EPA-HQ-OAR-2009-0923-2268-1)

Comment:

“WHAT I HAS BEEN AFFIRMED FOR ME IS THAT THE VERY GOVERNMENT AGENCIES THAT ARE FOR PROTECTION AND ASSURING THAT THE U.S. CITIZENS AND U.S. LANDS ARE PROTECTED AND THE BEST INTEREST OF SAID ARE TAKEN CARE OF - JUST ARE NOT. THE VERY AGENCIES ARE IN BED WITH BIG BUSINESS AND ENERGY AND ALL ABOUT POLITICS, COULD CARE LESS ABOUT WHAT THEY WERE SETUP TO DO. WE THE PEOPLE NEED TO TAKE BACK OUR COUNTRY FROM BIG BUSINESS AND ENERGY, AND NOT DEPEND ON CONGRESS TO IT, BECAUSE CONGRESS HAS BEEN BEHIND HELPING BIG BUSINESS AND ENERGY!!!! IF CONGRESS CAN NOT WORK FOR THE U.S. PUBLIC, THAN THEY ALL NEED TO BE GONE, ANDREPLANCED AND THAT CONTINUED UNTIL THERE ARE PEOPLE IN CONGRESS DOING THE PEOPLE'S WORK, NOT WORKING FOR BIG BUSINESS AND ENERGY!!!!!!” (EPA-HQ-OAR-2009-0923-2269-1)

Comment:

“Information is the key to action. So, thank you for what you have done so far to promote policies that require such. But more is needed!!!

It is critical that the public's right to know about about the global warming pollution being emitted by thousands of facilities in the oil and gas industry be protected.

The global warming pollution disclosure requirements prepared by EPA must not be delayed, regardless of the lobbying by the oil and gas industry. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.” (EPA-HQ-OAR-2009-0923-2270-1)

Comment:

“Please don't back off now; keep being the strong leader we need to ensure full disclosure of the global warming pollution emitted by the oil and gas sector.” (EPA-HQ-OAR-2009-0923-2270-2)

Comment:

“We've also learned they have a great habit of under estimating damages and telling the complete truth. They have even defied the government from knowing everything about their explorations/exploitations. If they have an agency charged with policing their activities, they just buy it. This has got to stop!” (EPA-HQ-OAR-2009-0923-2271-1)

Comment:

“There is no reason imaginable that should exclude this industry from the same standards for everyone else.” (EPA-HQ-OAR-2009-0923-2271-2)

Comment:

“Big oil and gas cannot continue to rule our country and control our government representatives. It will take courage but I really want you to do the right thing and hold big oil and gas accountable.” (EPA-HQ-OAR-2009-0923-2272-1)

Comment:

“Let's count the true cost of the oil industry.” (EPA-HQ-OAR-2009-0923-2273-1)

Comment:

“Start protecting us and the environment. That is your job.” (EPA-HQ-OAR-2009-0923-2274-1)

Comment:

“It's way beyond the time to hold big business accountable for their actions. Big oil has been lobbying for years to influence decision makers to turn a blind eye to their shenanigans...and to top it off,they get big subsidies to continue their raping of the planet's resources. AND, furthermore they don't even have to pay TAXES with their off-shore havens and figurehead out-of-country corporations. They have gained an "untouchable" status and considered "too big to fail". It has gone TOO FAR and TOO LONG. It is time for accountability. If I were to drag one (1) barrel of oil to the nearest pier, an drop it into the ocean...I would be arrested, thrown in jail and fined heavily. BP has dumped millions of barrels into the ocean,contaminated hundreds of

miles of shoreline, killed eleven people so far, ruined the fishing industry, bungled a lame attempt to "clean-up", devastated natural animal habitats, destroyed the beaches, and generally devalued the quality of life for hundred of thousands of citizens. This disaster that BP has created, all for their giant profits, has GOT TO BE STOPPED. If it takes all the money they have, this suffering area has got to be returned to it's former condition. Furthermore, BP has proved that there are NO safeguards to drilling at sea, and there is NO proven containment technology currently available. therefore, there should be NO OFF-SHORE DRILLING ALLOWED...period." (EPA-HQ-OAR-2009-0923-2275-1)

Comment:

“Thank you for making the decision to hold oil and gas companies accountable for their pollution. It is time to strengthen regulations on this industry.” (EPA-HQ-OAR-2009-0923-2276-1)

Comment:

“I'm sure you've seen the recent documentaries regarding our greenhouse gases, and the web of life, like "Home" - we need to make sure all of us are accountable, and I really think we need to aggressively move forward with other forms of green renewable power (not nuclear) before it's too late, and the environment takes off on a course we can no longer control. Please help protect us and the world with regulations that include these big oil companies in the greenhouse gas measurements that will help inform us all on how to survive beyond the next 10 years. Thanks you!” (EPA-HQ-OAR-2009-0923-2278-1)

Comment:

“This disaster has been devastating to the people and to the environment. It is time to protect our country and its waters for the future of our children. You must speak for those who can't speak for itself.” (EPA-HQ-OAR-2009-0923-2279-1)

Comment:

“The government, including EPA, is to work for the common good, for all of America. Thank you for your recent efforts to do more of that in the EPA. Now it's time to hold the oil industry to accountability for all they have been able to get away with! If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry won't monitor themselves to abide by any rules for the common good.” (EPA-HQ-OAR-2009-0923-2280-1)

Comment:

“Also, I urge the EPA to create restrictions for offshore drilling for any company that cannot PROVE they are capable of immediately stopping a well-head when disasters occur like the BP disaster.” (EPA-HQ-OAR-2009-0923-2281-1)

Comment:

“Don't let the oil companies put profits before the country, its people and its ecosystem. It will not reflect well for you nor them and the EPA will continue to incur the disgust of the American people.” (EPA-HQ-OAR-2009-0923-2282-1)

Comment:

“Big oil is run by a bunch of oily characters!” (EPA-HQ-OAR-2009-0923-2283-1)

Comment:

“It is incomprehensible that some of the main contributors to greenhouse gases should be exempt from reporting it. There can be no accurate accounting for greenhouse gases without the information from oil and gas industries.” (EPA-HQ-OAR-2009-0923-2284-1)

Comment:

“If there's anything we have learned in the past two plus years, it's that we cannot trust big business. You are only about money and you don't care about people or other animals and the environment. You deserve whatever comes your way, unless you regain your humanity.” (EPA-HQ-OAR-2009-0923-2285-1)

Comment:

“As a US citizen currently living in New Zealand, I hope that the USA will provide some leadership with regards to emissions so that countries such as New Zealand can stop using the USA's lack of progress as an excuse to not make their own progress.

Thank you for you time.” (EPA-HQ-OAR-2009-0923-2286-1)

Comment:

“It's way past time to get a handle on corporate pollution.” (EPA-HQ-OAR-2009-0923-2287-1)

Comment:

“We need to ask our polluters to monitor their spewing with inspectors to verify the accuracy.” (EPA-HQ-OAR-2009-0923-2288-1)

Comment:

“No more dirty lil secrets! Its time for big oil to be held responsible.The citizens deserve the right to know.” (EPA-HQ-OAR-2009-0923-2289-1)

Comment:

“I'm especially sick and tired of companies like BP blowing off their responsibilities by choosing to pay assessed fines rather than play by the rules when the fines come out of what they consider their petty cash fund. It's past time when that whole industry should be made to own up to their pollution and let the lobbyists be sent home.” (EPA-HQ-OAR-2009-0923-2290-1)

Comment:

“Enough is enough. It is time for all politicians and lobbyists to wake-up and realize Americans are tired of big business ruining the environment and lives.” (EPA-HQ-OAR-2009-0923-2291-1)

Comment:

“Your position with the EPA is very important in helping our country work to save the environment.” (EPA-HQ-OAR-2009-0923-2292-1)

Comment:

“I hope the administration makes stopping this oil spill its major focus until the mission is accomplished. I am devastated by this catastrophe. No more offshore drilling anywhere! A moratorium should be placed on all offshore drilling. BP should be held accountable for this mess.” (EPA-HQ-OAR-2009-0923-2293-1)

Comment:

“IT IS TIME for REAL LEADERSHIP!” (EPA-HQ-OAR-2009-0923-2294-1)

Comment:

“No more offshore drilling!!!! The entire food chain affected by this latest spill will die out and take years and years to recover -No more arctic drilling!! We are driving as little as possible and wish we had public transportation in our town!” (EPA-HQ-OAR-2009-0923-2295-1)

Comment:

“At the expense of our oceans, land, and air, the oil and gas industry have been above the law far too long!” (EPA-HQ-OAR-2009-0923-2296-1)

Comment:

“If these people are not held accountable the EPA will be a laughing stock.” (EPA-HQ-OAR-2009-0923-2297-1)

Comment:

“The time is now. You are the person. Please change these noxious laws.” (EPA-HQ-OAR-2009-0923-2298-1)

Comment:

“Thank you for your work, doing what you can to protect our air and water.” (EPA-HQ-OAR-2009-0923-2299-1)

Comment:

“Please support and enforce the mandatory pollution reporting rule. The EPA is now proposing to include the oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-2299-2)

Comment:

“And thanks for sending the EPA to Texas! Pay no attention to the governor!” (EPA-HQ-OAR-2009-0923-2300-1)

Comment:

“I believe that without standing up for what we must, we're direct contributors of the problem at hands. There already have been many disasters caused by petroleum, how many more tragedies do we need before we truly take action. These companies are buying off government serves left and right. Where's justice and integrity??” (EPA-HQ-OAR-2009-0923-2301-1)

Comment:

“We need leadership in our government that will help to preserve the quality of the environment we have today. Letting a group just slip by damages the quality of our lives. We are counting on you!” (EPA-HQ-OAR-2009-0923-2302-1)

Comment:

“I studied Biological Science in undergrad. This is very important to me.” (EPA-HQ-OAR-2009-0923-2303-1)

Comment:

“There must be a regulatory commission that looks over the shoulder of everyone involved (to keep things honest and fair). Without it, and very strong regulations and rules the worse could happen again.” (EPA-HQ-OAR-2009-0923-2304-1)

Comment:

“Our relationship with oil is like a bad marriage that has gone on far too long. They have apparently gotten so big in Louisiana that despite the despoiling of all life, leaders are saying that we need more oil exploration just to have some work for the people. What would they do, then, if a second big rig began leaking massive amounts? Let's keep going? I know that this is going to hurt, but we actually have no choice but to begin the long walk away from this industry, which has hurt us far more than it has helped. Force Big Oil to report what it is actually doing to us. Take the veil from across our eyes so that we can see clearly for the first time in our history.” (EPA-HQ-OAR-2009-0923-2305-1)

Comment:

“I'm a Community Health Nurse, faith-based, globally interested about stewardship of God's family and all natural resources.” (EPA-HQ-OAR-2009-0923-2306-1)

Comment:

“Government on the other hand must play its part by only issuing drilling licences after thorough environmental assessments have been carried. This includes looking at disaster recovery plans which seem to be lacking in this current disaster.” (EPA-HQ-OAR-2009-0923-2307-1)

Comment:

“HOW EXTRAORDINARILY SELFISH TO RECKLESSLY DESTROY WATERS AND NATURE FOR PROFIT -BAN OFF SHORE DRILLING - WE WANT SOLAR AND WIND ENERGY NOW” (EPA-HQ-OAR-2009-0923-2309-1)

Comment:

“We hope to enjoy bringing out the best in the character of those fine individuals responsible for the execution of petroleum product policy and practice today. We will, of course, need your diligent efforts for these individuals to embody the shining virtues they claim to possess.” (EPA-HQ-OAR-2009-0923-2310-1)

Comment:

“The oil and gas industry have not been held accountable in the past and BP will probably will not be held accountable for the current crisis. Our laws and regulations slap their wrists with low fines and then give waivers for any and all environmental or safety regulations. It would be nice for once if these corporations were held accountable for the damage they do our land, water and air.

Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2311-1)

Comment:

“It's time that the generations that have known such comfort and ease learn something from the sacrifices of the ones who came before us. Who sacrificed for the greater good. Did they live to see the completion of the railway system? Did they live to see the completion of the aqueducts or highways that connected our nation? Many did not, but they were willing to make choices that moved our country forward and INVESTED in our future and those of the next generations. Why are we so short sighted that we can't see how important investing in new energies is? Does it take a crisis to move forward? What if we make the right choices now because they are the right choices instead of waiting until we've poisoned another part of our country's landscape and eliminated the lively hoods of more Americans.

"A little rest, a little folding of the hands and calamity will come upon you."

- Proverbs 24:33” (EPA-HQ-OAR-2009-0923-2312-1)

Comment:

“PLEASE PUNISH THE GREEDY CEO'S OF BIG OIL COMPANIES, NOT PRESIDENT OBAMA , FOR THIS DISGUSTING NATURAL DISASTER !!!! HELP OBAMA SEND THEM TO PRISON AND SAVE THE WHALES !!!!!” (EPA-HQ-OAR-2009-0923-2313-1)

Comment:

“Please do not stand idly by - enough is enough!” (EPA-HQ-OAR-2009-0923-2314-1)

Comment:

“I hope that additional loopholes will be closed which allowed these companies to build rigs in places where they shouldn't.” (EPA-HQ-OAR-2009-0923-2315-1)

Comment:

“Big corporations are not above the law and not above accountability. I urge you to remember that our country's laws and regulations are for the people and the land we live on, and not to ensure big corporate profits.” (EPA-HQ-OAR-2009-0923-2316-1)

Comment:

“My husband and I live on the Mississippi Gulf Coast; for five years, we have been helping his parents cope with losing their home and rebuilding after Katrina. Now we have to deal with the criminal negligence of the greedy oil industry and the spill it has created.” (EPA-HQ-OAR-2009-0923-2317-1)

Comment:

“I am counting on the EPA to act quickly and responsibly!” (EPA-HQ-OAR-2009-0923-2318-1)

Comment:

“BP and all other oil companies make billions of dollars while Middle Class America pays their taxes AND suffers the consequences of their mistakes. Please, PLEASE hold these companies accountable for the waste and ruin they are causing our planet. Our children and grandchildren will suffer for the emissions BP and all of the other oil companies cause today.” (EPA-HQ-OAR-2009-0923-2319-1)

Comment:

“Please assert your authority to ensure the oil and gas industry abides by the public's interest.”
(EPA-HQ-OAR-2009-0923-2320-1)

Comment:

“If you are truly in existence to protect the environment, then I would also push for seizing BP assets in the USA until 100% of clean-up costs, community losses, employment losses are recouped. If you merely exist to assuage a gullible public, and continue to allow Big Oil to delay, appeal, deny...like in Alaska...20 years and they paid an infinitesimal amount of the original judgment...then you are part of the problem, and will be held accountable as well.” (EPA-HQ-OAR-2009-0923-2321-1)

Comment:

“WAKE UP AND SMELL THE DISASTER. I CAN, I LIVE IN KEY WEST, FLORIDA. DO YOU JOB - PROTECT ME AND THE ENVIRONMENT!” (EPA-HQ-OAR-2009-0923-2322-1)

Comment:

“Here are some "Kwazy Kwestions" for your Konsideration from one Konserned Citizen:

How is it possible to clean up oil without oil free water?

What happens when hurricanes pick up the oil/water/toxic chemical dispersant soup and power surge it up the land than rain it down on cities, power lines, farm land, crops, animals and into rivers, lakes and streams?

What happens when BP becomes "beyond punishment" and they walk away without paying any fine - just like Exxon has done with Valdez? Or maybe, they'll just roll over and pull an Enron? Like the Wall Street Fiasco, will profits be privatized and costs be externalized to the taxpayers? Where will our seafood come from? Some "toxic soup farm" in some far off land? Now we can depend on "toxic foreign oil and fish"?

Will the politicians, oil people and regulators (present and past) who presided over and approved this mess keep getting raises, retain their sacrosanct jobs, their private life time medical benefits, and a cushy retirement? Do we even know their names? Are they too, "beyond punishment" (BP)?

Does half the population still agree we need to "drill baby drill" (Sarah Palin notwithstanding)?

How many BP wells have been inspected and ordered SHUT down for similar safety issues?

Before this mess? During this mess? Or is nobody looking, still?

How many other BIG OIL wells have been inspected for safety? Infractions corrected? Fines actually levied and paid? Shut down? Or is nobody looking, still?

How many more lies will "we the people" tolerate and overlook from Big Oil's ownership of our Big Government regulators and present and formerly elected officials?

It is said in the "last days" the seas will turn red. Voila, pictures of this oil / dispersant mixture. Is the religious right praising God and BP and hoping it continues? Is God happy too? Will God save us from our collective free will choices?

How many people in the US and Mexico will starve or die of environmental health affects over the next 10 to 50 years because of this disaster?

Does OIL taste as good as fresh Gulf shrimp, oysters, fish? Is OIL as beautiful as the birds, grasses, gators and a million tiny creatures? Does OIL smell as beautiful as the flowers and marsh grasses?

As a Nation, what decisions are WE WILLING TO MAKE to END our dependence on oil? Or do we just go back to watching 'American Idol' and 'Dancing with the Stars' tune it all out and hope it just 'goes away'?

The choice is ours. What do you choose?

Your vote counts. Make it a wise one." (EPA-HQ-OAR-2009-0923-2323-1)

Comment:

"I grew up on the Gulf Coast and am personally VERY familiar with the level of pollution caused by the oil and gas industry. We just can't wait any longer to control these greed-heads who have no sense of the future. Your ruling could be the CHANGE we voted for back in 2008 and it is long overdue." (EPA-HQ-OAR-2009-0923-2324-1)

Comment:

"Please, please don't let any oil companies lobby out of their responsibilities to take care of their messes." (EPA-HQ-OAR-2009-0923-2325-1)

Comment:

"I work in air quality in the Midwest and have some familiarity with clean water initiatives, and there is no doubt that the Clean Air and Clean Water Acts have been tremendously successful. However, much more work is needed, and regulations along with compliance and enforcement are important.

Last year, the petroleum industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.

In addition, tighter facility regulations obviously are needed in the failure of chain-of-command at Deepwater Horizon to instigate shut-offs, and in the absence of the "fail-safe" blowout prevention system to do what was required. The various technologies used in the wake of the leak clearly were not tested under deepwater conditions, and the industry has not been open about its prevention and recovery capacities.

EPA must take direct and immediate action to prevent the kinds of water pollution that have already resulted from this catastrophe, and to apply to the offshore and onshore drilling companies the same kinds of regulations that have been so successful in pollution reduction for air and water.” (EPA-HQ-OAR-2009-0923-2326-1)

Comment:

“The time has long since come that we have to make a change in the way the big oil companies are allowed to do business.” (EPA-HQ-OAR-2009-0923-2327-1)

Comment:

“The time has long since come that we have to make a change in the way the big oil companies are allowed to do business.” (EPA-HQ-OAR-2009-0923-2328-1)

Comment:

“More than ever, we need to have accurate and thorough accounting of greenhouse gas emissions from all fuel industry endeavors, on and offshore. The spiral of emissions is leaving us vulnerable to the devastating effects of global warming, and businesses need to be held accountable, as they will not do it themselves, and we will all pay a very high price for their inaction. I strongly support mandatory greenhouse gas reporting for on and off shore oil and gas industry, as soon as possible. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements, and that the industry will be forced to comply with regulations, not just fined.

Thank you for all you do and for listening.” (EPA-HQ-OAR-2009-0923-2329-1)

Comment:

“Having grown up on the Gulf Coast I am heartsick about the damage we are going to have to cope with in the coming months and years. We can no longer afford to let the oil and gas industry call the shots. The EPA must step out boldly to set high standards for pollution

emissions and measurements.” (EPA-HQ-OAR-2009-0923-2330-1)

Comment:

“Let’s also hold the line on new drilling leases and encourage alternative energy sources other than coal. Citizens must pull in their use of oil, like they do in Europe, mandated by the government if possible. And, we must fund research into alternate sources of energy.” (EPA-HQ-OAR-2009-0923-2331-1)

Comment:

“Accountability is the key word which has been ignored insofar as oil and gas responsibilities. We can no longer ignore this as the repercussions of pollution are now observable and therefore must be closely monitored for emissions and potential problems in the future.” (EPA-HQ-OAR-2009-0923-2332-1)

Comment:

“Divine Creation on Mother Earth must be protected period.” (EPA-HQ-OAR-2009-0923-2333-1)

Comment:

“Stop selling out to big corporations. You are accountable to the American people, not to them.” (EPA-HQ-OAR-2009-0923-2334-1)

Comment:

“Ultimately, we should not even be on a fossil fuel system any longer! There are plenty of clean, renewable energy resources that we can and should be supporting! We should have been doing this for the last 30 years...we are not "addicted" to oil (fossil fuels), we are being held hostage!” (EPA-HQ-OAR-2009-0923-2336-1)

Comment:

“We can see what happens when you look the other way and ignore the common sense measures needed to protect American people’s land, water and precious environment. Do the right thing now!” (EPA-HQ-OAR-2009-0923-2337-1)

Comment:

“They say we learn from history, so far we fall way short! ala exxonvaldeez etcetera. shame on us!” (EPA-HQ-OAR-2009-0923-2338-1)

Comment:

“The oil and gas industries act all humble and apologetic, when an incident such as the BP tragedy in the Gulf and Exxon Valdez (which is still affecting the environment in Alaska) but have never admitted responsibility for the secret pollution of small segments of our environment. It's time to end that.

These industries must be held responsible for ALL pollution and damage to the environment caused by their disregard for nature.” (EPA-HQ-OAR-2009-0923-2339-1)

Comment:

“Treble Damages AND 11 Murder Counts.” (EPA-HQ-OAR-2009-0923-2340-1)

Comment:

“You are supposed to represent the American people not the corporations!” (EPA-HQ-OAR-2009-0923-2341-1)

Comment:

“Not to put pressure on you or anything, but . . . all of life of Earth is depending on you to DO THE RIGHT THING. You know what needs to be done; now you just have to find the resources within to do it.” (EPA-HQ-OAR-2009-0923-2342-1)

Comment:

“It's pretty clear that:

The first priority is stopping the runaway spill. There must be experts with ideas better than BP's. Certainly they want to stop it; but they seem more interested in image control than with either coming clean with the public on the severity of the catastrophe (you can't hide from mother nature). And coming clean with how they plan to control it. The truth seems to be that they are shooting from the hip and haven't a clue. And hope if it gets severe enough, they can push it off on the tax payers.

We know historically oil companies clean up 10% of their mess at best.

The second priority is to ensure such disasters don't ever happen again. But already people who know little of BP's negligence in this episode, as well as the Exxon Valdez disaster (which after 21 years is not cleaned up, nor are the fees paid off, nor is there mention of charging BP, who ran the emergency team that was supposed to be on ready, but weren't) Allowing BP's Atlantis to keep drilling at 7000 feet and Shell to drill in the Arctic is lunacy. Let's hope temporary moratoriums will be extended until we can be assured safety - if that is ever possible with these companies.

We've got to get on with alternative, clean (not coal or nuclear) energy, The sun has always had the best options.” (EPA-HQ-OAR-2009-0923-2343-1)

Comment:

“The Gulf Oil Spill is a complete disaster and has proven BP and the rest of the oil and gas industry care nothing about safety, ecology, or proper business practices. This tragic event should teach us a lesson and be a catalyst to do what is necessary to hold ALL oil and gas companies accountable and ensure the lobbyists don't prevent proper regulations and reporting of violations. Just in the last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. We can get back on the right track this year. The EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. Please think of our Country: the land, the air, the water, the animals, and most important the people - EVERYDAY AMERICANS! Do what is right for our OUR COUNTRY and not what pads the pockets of big industry.” (EPA-HQ-OAR-2009-0923-2349-1)

Comment:

“This disastrous leak causes me to wonder if life on our planet will end not by asteroid, super volcanic eruption or other natural cause, but instead by our own careless stewardship. Political business as usual, allowing lobbyists to dissuade politicians from seeking the best for the public welfare, is no longer an option. Please enforce accountability and protect our environment.” (EPA-HQ-OAR-2009-0923-2350-1)

Comment:

“Thank you for considering my comments.” (EPA-HQ-OAR-2009-0923-2351-1)

Comment:

“I urge also that MMS, EPA, and other agencies quit taking the corporations' word on their expertise and on their technological prowess. They know how to make a disaster; they do not know how to fix a disaster.” (EPA-HQ-OAR-2009-0923-2352-1)

Comment:

“Yes my kids live in the Gulf! I know that this will do harm to my kids if it is not fixed soon, no way around it. Mother Earth put all that nasty stuff deep! We need to stop burning oil now!!” (EPA-HQ-OAR-2009-0923-2353-1)

Comment:

“Although shareholders, board members and senior execs of these companies only care about the immediate bottom line and the price of their stock, the only entity that can force them to work in the best interests of the country and the long-term interests of the planet is the gov't. These companies as we all know invest millions of dollars in lobbying & buying political votes. If they invested these dollars in r&d, perhaps the planet would be much better off....please hold these companies accountable” (EPA-HQ-OAR-2009-0923-2354-1)

Comment:

“The oil and gas industry must be regulated and closely monitored. The leaders of these corporations do not have the public good as a goal, only profit is of interest.

It is time to phase out oil and gas as fuels and turn to naturally driven sources, such as the sun, wind and waves.” (EPA-HQ-OAR-2009-0923-2356-1)

Comment:

“The BP disaster in the Gulf makes it clear to us that Big Oil/Gas cares not a hoot about our atmosphere, our shorelines, or our waters. We have read that BP makes over 9 Million an Hour. That company surely should pay for every bit of damage it has caused. This includes cleaning up the shoreline, clearing the oil blobs out of the Gilf as much as possible, and providing recompense to the fishermen, farmers, resort owners, and all others who have been hurt by the "Profitover Responsibility" manner in which the business operates.” (EPA-HQ-OAR-2009-0923-2357-1)

Comment:

“It's time for the lobbies to go home and for the EPA to make a strong, definitive ruling without loopholes to make these companies find environmentally safe ways to work. Our planet is being destroyed before our eyes and it really won't matter who has the most money, power or influence if this continues. Please send the oil companies a real mandate now.” (EPA-HQ-OAR-2009-0923-2358-1)

Comment:

“If we have learned anything else, it is that we are all responsible every time we drive, especially when it is not necessary. We can't have it both ways a clean environment and a disregard for the consequences of our own behavior.” (EPA-HQ-OAR-2009-0923-2359-1)

Comment:

“I am really too angry about the entire situation to say anything more than what was already written here. The oil and gas companies in this country get away with murder. It is beyond disgusting. Please force them to pay for every cent it takes to clean up the spill in the Gulf and stop allowing off-shore drilling. And NO drilling in wildlife refuges. Get real. There's no safe way to do it. The oil and gas company representatives do nothing but lie and cut corners. Stop letting them get away with it.” (EPA-HQ-OAR-2009-0923-2360-1)

Comment:

“True freedom is conserving America the Beautiful --- not allowing drilling in favor of rigorous patriotic conservation.” (EPA-HQ-OAR-2009-0923-2361-1)

Comment:

“I am sickened by what is happening in the Gulf, and in many other partsof the world where there is off-shore drilling that we don't hear about.” (EPA-HQ-OAR-2009-0923-2362-1)

Comment:

“Without regulation and enforced penalties there is no hope for the planet. The greed of the oil and energy corporations races us to our destruction. Stop earth's eradication.” (EPA-HQ-OAR-2009-0923-2363-1)

Comment:

“The deep pockets of the 'O&G" industry must not be permitted to influence our officials in the traditional obsequious ways of the past. Time is right....the people are angry....the cost is unbelievably high....you are in charge....we are watching!” (EPA-HQ-OAR-2009-0923-2364-1)

Comment:

“As a federal regulatory agency EPA must use scientifically accrued data to properly serve its responsibilities to the American people. By industry flouting the EPA's efforts we doubly lose by seeing our taxdollars wasted as well as not getting protection from harm to the environment. Please rise above the politics and pressure from lobbies and do the right thing for our future. Thank you.” (EPA-HQ-OAR-2009-0923-2365-1)

Comment:

“Thank you for doing all within your power to protect our environment by putting necessary regulations in place to do just that -- protect our environment.” (EPA-HQ-OAR-2009-0923-2366-1)

Comment:

“I believe that the oil and gas industry have too much power. We have given them that power by being so dependent on them as a nation. The Gulf oil spill has once again forced them into the spotlight.” (EPA-HQ-OAR-2009-0923-2368-1)

Comment:

“Please do not allow any more loopholes for the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2369-1)

Comment:

“In business school it is held as axiomatic that you cannot control what you cannot measure, so the measurement of GHGs is essential.” (EPA-HQ-OAR-2009-0923-2370-1)

Comment:

“PLEASE DO WHAT IS RIGHT FOR OUR AMAZING PLANET AND ALL OF LIFE THAT SHE SUPPORTS!” (EPA-HQ-OAR-2009-0923-2371-1)

Comment:

“I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. If the EPA doesn't hold these people accountable, who will?” (EPA-HQ-OAR-2009-0923-2372-1)

Comment:

“no more off shore drilling - Make BP compensate for damage stricter regulations - % of oil profits go t relief fund for damages” (EPA-HQ-OAR-2009-0923-2373-1)

Comment:

“That's what's wrong in America now - no accountability! A long time ago, people were held accountable for their mistakes. Let's get back the old values before these short-term thinkers destroy the planet.” (EPA-HQ-OAR-2009-0923-2374-1)

Comment:

“The oil companies need to be held accountable for their share of emissions both onshore and offshore. They get plenty of breaks from the government - this is one that they can live with and we can all benefit from.” (EPA-HQ-OAR-2009-0923-2375-1)

Comment:

“Ignorance is NOT bliss. We need data in order to accurately evaluate situations and to draw realistic conclusions. Please ensure that the effects of the gas and oil industry will be included in environmental analyzes.” (EPA-HQ-OAR-2009-0923-2376-1)

Comment:

“Why should we exempt this industry that causes so much pollution and damage? We shouldn't.” (EPA-HQ-OAR-2009-0923-2377-1)

Comment:

“Quit blaming the Government for not regulating the industry enough-make them take responsibility!

The EPA is supposed to be protecting the people not the greedy oil industry.” (EPA-HQ-OAR-2009-0923-2378-1)

Comment:

“Someone has to step up and do what is morally and ethically right. The oil industry has been making the laws for far too long. These people cannot be trusted to police themselves. That is precisely how the Gulf of Mexico disaster happened!” (EPA-HQ-OAR-2009-0923-2379-1)

Comment:

“This spill is beyond words or anything comprehensible. President Obama must stop following the usual channels for action and have the confidence to use his position and office to not rely on the army corp of engineers or ken salazar or the department of interior etc. to make decisions concerning the oil spill. Can't he see how broken and corrupt these agencies are? Think for yourself Obama and others, think outside the box, take help from anywhere, forget the budget or else suffer the consequences for not doing so!” (EPA-HQ-OAR-2009-0923-2380-1)

Comment:

“Even before the BP disaster, there was no good reason that I could see for excluding oil and gas companies from mandatory emissions reporting. Now, ti really seems unconscionable for the exemption to continue.” (EPA-HQ-OAR-2009-0923-2381-1)

Comment:

“And the top exucetives in BP be help responsible for both the pollution spill and it's consequenses and for the death of the oil rig workes due to BP negligence.” (EPA-HQ-OAR-2009-0923-2382-1)

Comment:

“This statement is from Jefffey Wiles of Hopkins, MN. I am an environmental biologist staffed to the Air Force Reserve/Minneapolis-St. Paul Air Reserve Station/MN.” (EPA-HQ-OAR-2009-0923-2383-1)

Comment:

“I support your inclusion of the oil and gas industries in the mandatory greenhouse gas reporting rule.

I urge the EPA to do everything in its power to rein in these industries, reduce greenhouse gas pollution, and support the transition to a green economy.” (EPA-HQ-OAR-2009-0923-2384-1)

Comment:

“The BP disaster has sent clear message. I urge you to support the EPA proposal to require the offshore, as well as onshore, oil and gas industries to report their greenhouse gas emissions. The strong lobby of the gas and oil industries should not be allowed to exempt them from their global responsibilities !” (EPA-HQ-OAR-2009-0923-2385-1)

Comment:

“Start representing the will of the people instead of big money. If you do not we need to revolt. You are ruining everything” (EPA-HQ-OAR-2009-0923-2386-1)

Comment:

“Enough is enough. I have worked in the oil exploration industry. I now owrk in the water industry. Just the pollution of what they have destroyed so far is enough. You have rigourus regulations on cleanwater, what about these guys? You have to hold them to a higher standard.” (EPA-HQ-OAR-2009-0923-2387-1)

Comment:

“I am a Californian and since the state hosts many refineries, am vvery sensitive to the need to minimize air polution on a local and global basis. After all, the atmosphere is is a diffusing film on the Earth's surface.” (EPA-HQ-OAR-2009-0923-2388-1)

Comment:

“The EPA is our first and maybe last line of defense against wanton profiteers who would destroy our environment for short-term corporate gains. Please do all possible to regulate gas and oil corporations. Hold these environmental outlaws responsible for every monetary damage and every reparation dollar needed to return health to the people, land and wildlife they have imperiled.” (EPA-HQ-OAR-2009-0923-2389-1)

Comment:

“In this day and age with all the technology we poss, it is totally unacceptable for this disaster to one happen it first place and two not be under control after some much time has gone by. Something must be done now and in the future to ensure this NEVER happens again.” (EPA-HQ-OAR-2009-0923-2390-1)

Comment:

“The oil and gas industry must report its greenhouse gas emissions in order for total emissions that cause global climate change to stay in check.” (EPA-HQ-OAR-2009-0923-2391-1)

Comment:

“What has happened in the Gulf of Mexico is outrageous! We must put controls on off-shore drilling NOW.” (EPA-HQ-OAR-2009-0923-2392-1)

Comment:

“i think all the below is essential, that compromise is essential, but to watch our ocean become disgusting with filthy pollution is a tough price to play for getting along.

I firmly believe we have to reach for the next evolutionary step and design new systems. We have to have the vision to take bold steps in problem solving, and to initiate deep changes. And yes, how on earth can the oil industry not be answerable to the mandatory greenhouse gas reporting rule?” (EPA-HQ-OAR-2009-0923-2393-1)

Comment:

“This country is being destroyed by corporations and government administrators sit back and watch.” (EPA-HQ-OAR-2009-0923-2394-1)

Comment:

“This is so obvious it almost doesn't warrant comment but there must be fines significant enough to cover everyones damages that occur at the time of incidence and ongoing and in the future. I also believe there should be consideration of criminal charges. If I were to change the oil in my car and it spilled in my parking lot or in my drainage ditch ther would be charges and there should be exponential charges for crimes, such as the BP disaster, as well.” (EPA-HQ-OAR-2009-0923-2395-1)

Comment:

“This problem has been with us for too long, harming humans and our environment.

Hopefully we have learned from viewing the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2396-1)

Comment:

“Why should the oil and gas industry be exempt from reporting its global warming pollution imissions?” (EPA-HQ-OAR-2009-0923-2397-1)

Comment:

“Ms. Jackson, the "top kill" approach to halting the eruption of oil in he Gulf of Mexico is now categorized as "failed." Please look into a permanent reorganization of MMS, and do everything you can to keep this kind of a disaster from ever happening again.

For the record, I think that you and the President "get it" and are doing all you can with what you've got to work with. Hang in there!” (EPA-HQ-OAR-2009-0923-2398-1)

Comment:

“It is my sincere wish that these rules apply to King Coal as well.

Thank you for considering my opinion, and I wish you and yours health and peace.” (EPA-HQ-OAR-2009-0923-2399-1)

Comment:

“It's time to fully hold companies accountable for the pollution they generate.” (EPA-HQ-OAR-2009-0923-2400-1)

Comment:

“We've all had enough of the cavalier and contemptuous actions of Big Oil. Their cover is blown. Let's hold them accountable, to a high standard, for the sake of the planet we so tenuously inhabit.” (EPA-HQ-OAR-2009-0923-2401-1)

Comment:

“This disaster could have been prevented. Please help preserve our environmental resources and livelihoods of the American people.” (EPA-HQ-OAR-2009-0923-2402-1)

Comment:

“I hope that now is the right time to stand up to big oil. Our current situation in the gulf clearly demonstrates that they will not voluntarily take measures to protect the environment, so it is up to the EPA to ensure they are monitored and held accountable. Please act to track these emissions while public sentiment is with you.” (EPA-HQ-OAR-2009-0923-2403-1)

Comment:

“This must stop!!! The destruction to our planet is getting out of control and until we make oil and other fossil fuels accountable, we won't have a planet left that's fit to live in.” (EPA-HQ-OAR-2009-0923-2404-1)

Comment:

“THIS IS JUST ANOTHER EXAMPLE OF THE INDUSTRY WRITING THE RULES THAT GOVERN THE INDUSTRY. STOP IT.” (EPA-HQ-OAR-2009-0923-2405-1)

Comment:

“LET US RECALL THAT BP AS HEAD OF THE PIPELINE CONSORTIUM, WAS LEGALLY RESPONSIBLE FOR CONTAINING AND CLEANING UP THE VALDEZ SPILL. THEY FAILED MISERABLY. ROUGHLY HALF THE SPILL IS STILL THERE, STILL TOXIC, UNDER A THIN LAYER OF SAND AND MUCK THAT IS STRIPPED OFF IN HEAVY WEATHER, RE-EXPOSING THE TOXIC MATERIAL.

THE LAST TIME A BP DEEP-SEA WELL HAD A BLOWOUT, BP REQUIRED NINE MONTHS TO HALT THE LEAKAGE. THERE IS NO GUARANTEE THAT BP WILL DO BETTER THIS TIME. IN FACT, THE DOOMSDAY SCENARIO - THAT THE WELL LEAKS UNTIL THE OIL RESERVE IS EMPTIED - IS POSSIBLE.

THE ONLY PRUDENT PROCEDURE AT THIS POINT IS TO BAN ALL OFFSHORE DRILLING UNTIL THERE IS ROCK-SOLID EVIDENCE THAT BLOWOUT PREVENTER SYSTEMS EXIST THAT ARE ABSOLUTELY RELIABLE, AND SUCH PREVENTER SYSTEMS ARE MANDATORY FOR ALL OFFSHORE DRILLING.” (EPA-HQ-OAR-2009-0923-2406-1)

Comment:

“Why do we always have to have a catastrophe of unprecedented nature before WE LEARN our LESSONS.....PLEASE WE ARE RUNNING OUT OF CHANCES TO CORRECT OUR STUPID MISTAKES. With out this priceless environment none of us have anything!!!!!!!!!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-2407-1)

Comment:

“Thanks for your recent public words on the issue of climate change. It's enormously heartening, in the midst of the Gulf disaster and the ever worsening news on climate change, to know that you are fighting to get the job done. Please protect our right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

I see that EPA has finalized global-warming pollution disclosure requirements for other big emitters, but that the oil and gas industry has successfully pushed to delay action by your agency.

We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its CO₂ and CH₄ emissions. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data by government inspectors, not industry estimates. (It's amazing to me that, given the appalling revelations about Massey Energy's and BP's lies and negligence over the last few months, anyone can still profess to trust any statements by the fossil-fuel industry whatever.)

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability.

Once again, I really appreciate your leadership in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy. At this point, without the kind of strong policy action you're trying to take, the energy playing field won't be leveled and not enough capital will flow fast enough into clean energy technology and conservation to save us from utter catastrophe. Please go on speaking loud and clear in the councils of the administration and in public. Hundreds of thousands of ordinary people like me have got your back.” (EPA-HQ-OAR-2009-0923-2408-1)

Comment:

“For those of us who care much more about the health of our children, grandchildren and future generations than profits and dividends, please stand fast on protecting our environment.” (EPA-HQ-OAR-2009-0923-2409-1)

Comment:

“It is sad to see how we have sold our ethical and moral standards. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-2410-1)

Comment:

“I join several hundred million other Americans, who have watched the BP Gulf catastrophe ravage the environment, wildlife, people's livelihoods, and entire communities involved in the Gulf seafood industry, in demanding that BP, as well as the entire oil and gas industry, be held completely accountable for its misdeeds and consequent devastations to the country, whether

from oil spill disasters or pollution emissions hugely contributing to global warming.” (EPA-HQ-OAR-2009-0923-2411-1)

Comment:

“This whole disaster is so overwhelming to me - very depressing and upsetting. Our precious wildlife and ocean life is under such threat -I am worried sick what the end result will be for them. PLEASE make BP pay for this catastrophe and let us, as a nation, stop off-shoredrilling. Let us work toward alternative sources of energy that ARE NOT going to destroy our world! Thank you.” (EPA-HQ-OAR-2009-0923-2412-1)

Comment:

“The Gulf Coast will NEVER be the same again. How come Big Oil can just drill away without any means of handling spills???” (EPA-HQ-OAR-2009-0923-2413-1)

Comment:

“I strongly support the decision to set things right and finally include the offshore and onshore oil and gas industry in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2414-1)

Comment:

“PLEASE - WE NEED TO HOLD THE OIL AND GAS INDUSTRY ACCOUNTABLE!”
(EPA-HQ-OAR-2009-0923-2415-1)

Comment:

“Everything is a blessing, including the latest disaster, so we can wakeup to alternative energy sources and get American ingenuity back on its feet and take the role of the leaders that we are. Yes we can!!” (EPA-HQ-OAR-2009-0923-2416-1)

Comment:

“I completely agree with the foregoing statement. I know the oil and gas companies will argue that we need their products for our national security, but this is a straw man. The time will come when we either allow them full rein to destroy our environment or we must face the inevitable need to find alternative ways to meet our energy needs, so why not start now.” (EPA-HQ-OAR-2009-0923-2417-1)

Comment:

““Man has lost the capacity to foresee and forestall. He will end by destroying the earth.”
___Albert Schweitzer” (EPA-HQ-OAR-2009-0923-2418-1)

Comment:

“Please show that we can learn how dangerous it is to do deepwater drilling on this disaster and we don't need another lesson. make sure that the oil companies have to pay for the total cost for this. If the cost of gas goes up or the stock prices plunge then we will start seeing the TRUE COST of oil and not , in essence , being subsidized by our taxes.” (EPA-HQ-OAR-2009-0923-2419-1)

Comment:

“If, indeed, the Environmental PROTECTION Agency is there to provide protection for the environment, it is basic common sense that it must act to demand that congress pass legislation to do just that. Nothing less is acceptable.” (EPA-HQ-OAR-2009-0923-2420-1)

Comment:

“Please correct the loophole that allows the oil and gas industry freedom from accountability for their pollution through emissions.” (EPA-HQ-OAR-2009-0923-2421-1)

Comment:

“If one good thing comes from this spill it is, we must be careful. accedents always happen. were lucky its an oil spill and not a nuclear accedent. We'd all be looking for a new home.” (EPA-HQ-OAR-2009-0923-2422-1)

Comment:

“It is our hopes and desire that offshore underwater drilling be halted.” (EPA-HQ-OAR-2009-0923-2423-1)

Comment:

“We need to hold accountable the oil and gas industry for its globalwarming pollution. We need to know where greenhouse gas emissions are coming from and in what quantities. Thank you for considering my comments.” (EPA-HQ-OAR-2009-0923-2424-1)

Comment:

“I think it's time the oil companies pay for their mistakes since they never have had to pay for anything.” (EPA-HQ-OAR-2009-0923-2425-1)

Comment:

“It is time to take more responsibility for our energy needs and methods to which we produce energy!” (EPA-HQ-OAR-2009-0923-2426-1)

Comment:

“No industry should be permitted to withhold pollution statistics from the public. All persons and corporations must be subject to reporting all pollution to the EPA. Failure to include some of the activities causing pollution to our air, water and soil is not only unacceptable but potential dangerous to all life on this planet. Please correct any loopholes in the laws allowing these blunders as quickly as possible.” (EPA-HQ-OAR-2009-0923-2427-1)

Comment:

“It is amazing as well as outrageous that energy companies should insist on making their millioins the old fashioned way which is destroying the planet and all forms of life upon it. When all they would have to do is invest a bit in safe renewable energy, at tha same time crating jpbs and saving lives, with very little effort. Our governmetn and we the People have the ability to outlaw dangeraous and deadly means of energy production. We should do that and save our home planet along with all it's various life forms including humans. And if a giant corporation loses a littel bit of money in the investment, or even goesbankrupt. Why should any of the rest of us care? They've had their way for far too long. The little people have a right to earn a living too! let's turn the tables.” (EPA-HQ-OAR-2009-0923-2428-1)

Comment:

“BP and other companies that attempt or propose to explore for oil in the deep ocean must have a rock solid plan for spill containment and other disasters, as is now happening in the Gulf of Mexico.

Apparently BP had no "Plan B" for rapid containment of spills or related emergencies. The only thing they apparently relied on was hope and prayers that nothing would go wrong. Well things did go terrible wrong and BP had no real plan of action to seal the leak.

Such incompetency must cease. The Minerals management Service must perform in depth

environmental analysis on all deep water exploration activities prior to issuing any permits to drill.

There must be no waivers of environmental or other safety requi” (EPA-HQ-OAR-2009-0923-2429-1)

Comment:

“The tragecy in the Gulf of Mexico provides us with the impetus and the momentum to move ahead with this kind of legislation. The big pollters need to come under effective regulation.” (EPA-HQ-OAR-2009-0923-2430-1)

Comment:

“Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates. It doesn't make any sense to rely on the criminal to report how much crime he has committed! Seems obvious to me. Without outside oversight and enforcement, we have nothing at all to protect us, we the citizens of the planet. Pollution doesn't adhere to political/econimic boundaries!

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability and would:” (EPA-HQ-OAR-2009-0923-2431-1)

Comment:

“I really think the clean-up of the Gulf should be at BP's expence, not the tax payers, and oil and coal should have far better over sight in safety than what the EPA is doing now.” (EPA-HQ-OAR-2009-0923-2432-1)

Comment:

“IT IS TIME TO TREAT THIS AS AN ENVIRONMENTAL DISASTER. BP CAN CONTINUE TO ATTEMPT TO CONTAIN. THE FEDS MUST BEGIN MOBILIZATION TO DO THEIR DAMNED TO SAVE WHAT WE CAN. ALL RESOURCES MUST BE UTILIZED AND DO AND TAKE ALL GOVT ACTION TO ASSIST IN THE DISASTER.” (EPA-HQ-OAR-2009-0923-2433-1)

Comment:

“Of all the news stories in the last 2 years, the oil in the gulf has me the most concerned. It has motivated all of my family members to reduce use of oil. This disaster will affect people, animals and the oceans for so many years to come. I really want there to be much more strict rules for the oil and gas industry. No amount of profit is worth the destruction we are witnessing in the gulf.” (EPA-HQ-OAR-2009-0923-2434-1)

Comment:

“Right now the something is happening in PA with the marcellus shale but on a smaller scale and our politicians are in the oil and gas industries pocket. No matter what we tell them, they keep giving them the green light to drill! Please help us protect our forests, water and way of life!” (EPA-HQ-OAR-2009-0923-2435-1)

Comment:

“NOTE FROM SENDER: I HAVE READ THIS LETTER AND AGREE WITH IT AS WRITTEN.” (EPA-HQ-OAR-2009-0923-2436-1)

Comment:

“And I would urge you in getting some measure of control of this, because it really appears that BP is calling the shots in THEIR best interests, not in ours nor that of the environment at large.” (EPA-HQ-OAR-2009-0923-2437-1)

Comment:

“In short: Act to hold Big Oil accountable, now. Thank you.” (EPA-HQ-OAR-2009-0923-2438-1)

Comment:

“By the way, thanks to all of the administration for their diligent efforts to control BP and the disaster in the Gulf -- and in particular your attempts to control the disbursements they are using to hide the amount of oil. "We the people" appreciation all efforts to control the mega corporations immoral and dangerous behavior.” (EPA-HQ-OAR-2009-0923-2439-1)

Comment:

“We -- the human race -- have been given the sacred trust of being stewards of the Earth. We -- the American people and the U.S. government -- have the particular responsibility for the awesome richness of the legacy of wilderness lands, waters and wildlife in and around our

blessed nation. If we fail at this sacred responsibility it will be to our peril.

We are failing now and urgently need to change our course.

If we have learned anything watching the grim BP disaster unfolding in the Gulf, it's that the oil and gas industry must be held accountable.

The oil and gas industry is not behaving responsibly -- toward the American people, to the people of the world, or to the planet. clean air is and should be the most basic right for all living things on this planet.” (EPA-HQ-OAR-2009-0923-2440-1)

Comment:

“I take this state of affairs personally! Be a true steward of this ship, this Mother Earth. There is Good Reason we cal Her "Mother Earth"!” (EPA-HQ-OAR-2009-0923-2441-1)

Comment:

“No industry contributor of CO2 should be allowed to be exempt, include the oil and gas industry with those who must report.” (EPA-HQ-OAR-2009-0923-2442-1)

Comment:

“As a resident of the Gulf Coast I am disgusted with the Oil Companies! In this particular case Houston and Galveston are not in any immediate danger, however if as I have you had spent many hours on the beach at Galveston as I have you would see the awful wasting away of the beaches due to oil polution. This latest episode is the single worst but certainly not the only episode in the gulf! We must do something immediatly!” (EPA-HQ-OAR-2009-0923-2443-1)

Comment:

“We knew within days that the Gulf oil disaster had been completely preventable, but BP has once again demonstrated that big industry cannot be relied upon to work safely, no matter how enormous their profits may be.

BP chose to cut corners and work with defective safety equipment, and ignore established protocols. As a result, we have the largest oil spill disaster in US history that will likely ruin many coastal and fishing industries for generations to come.” (EPA-HQ-OAR-2009-0923-2444-1)

Comment:

“I also feel that the law should include strict inspection and maintenance for all existing off shore oil rigs.” (EPA-HQ-OAR-2009-0923-2445-1)

Comment:

“P.S. A lot more federal oversight (regulation) is needed of gasdrilling in the Marsellas field. The amount of water needed to drilleach well is millions of gallons and is often taken from fresh waterstreams by sucking them dry. The toxic pollutants that are a by-productof the drilling have not been safely stored and holding ponds have overflowed during heavy rainfall and resulted in untold pollution of fresh streams and drinking water. State regulation to date (PA is primeexample) has been woefully inadeguate.” (EPA-HQ-OAR-2009-0923-2446-1)

Comment:

“Our country, the environment, its animals and we human beings are suffering from the callous lack of responsibility of the oil industry.” (EPA-HQ-OAR-2009-0923-2447-1)

Comment:

“I’ve personally just bought a hybrid car because feel literally sick over the Gulf oil spill. We ALL have to do our part to help keep our planet livable.” (EPA-HQ-OAR-2009-0923-2448-1)

Comment:

“The Gulf B P oil spill is just NOT acceptable.” (EPA-HQ-OAR-2009-0923-2449-1)

Comment:

“Current event are a stern reminder for the need to police such industries especially when their potential for environmental catastrophe is so high.” (EPA-HQ-OAR-2009-0923-2450-1)

Comment:

“Oil companies need to take full financial responsibility for this mess. Offshore drilling needs to stop and be replaced with something more global friendly.

We can do it - but only if we want to - do you want to?” (EPA-HQ-OAR-2009-0923-2451-1)

Comment:

“There are some things that must go beyond politics and lobbyist influence. This is one of them. Please act now for all our sakes.” (EPA-HQ-OAR-2009-0923-2452-1)

Comment:

“There has been discussion of raising the cap on liability to \$10B. I suggest that there should be no cap other than complete liability. BP widely sidestepped or ignored regulations and safety concerns. It is quite possible that a \$10B cap will turn out to possibly be a gift to big oil. Way less than the cost of their malfeasance. If you break it, you own it, even if it bankrupts your corporation.” (EPA-HQ-OAR-2009-0923-2453-1)

Comment:

“There has been talk that the oil spill won't be stopped until August. That is too long a wait. It needs to be stopped now Please do everything that you can to stop it.” (EPA-HQ-OAR-2009-0923-2454-1)

Comment:

“BIG OIL COAL AND FINANCE BUSINESSES HAVE PROVEN THAT THEY HAVE NO REGARD FOR THE HEALTH OF OUR PLANET OR OUR PEOPLE. CURBS MUST BE PUT ON THEM BEFORE WE TOTALLY DESTROY OUR LIVES AND THE LIFE OF OUR PLANET.

ACTIONS MUST BE TAKEN - NOW!!!!!!” (EPA-HQ-OAR-2009-0923-2455-1)

Comment:

“I lived on a Gulf of Mexico beach and know personally how devastating even a small oil spill can be to wildlife and tourism. They must be held accountable.” (EPA-HQ-OAR-2009-0923-2456-1)

Comment:

“Other countries demand safety practises before allowing drilling--it is time United States gets with it and quit kowtowing to the oil interests--8 years of that is more than enough.” (EPA-HQ-OAR-2009-0923-2457-1)

Comment:

“If we are going to hold the Oil Industry accountable for its pollution, we need to know where it is coming from and in what quantities.” (EPA-HQ-OAR-2009-0923-2458-1)

Comment:

“This requirement is necessary to accurately know the causes of pollution so that they can be corrected immediately to save our planet and its populations.” (EPA-HQ-OAR-2009-0923-2460-1)

Comment:

“This country has been built on the premise that WE CAN RALLY AND USING INNOVATIVE TECHNOLOGY set an example for the world on becoming stewards of the earth! LET'S DO IT! (with BP's funding)” (EPA-HQ-OAR-2009-0923-2461-1)

Comment:

“How can U. S. taxpayers feel that they are in a democracy if they should be required to help big business oil companies who have made huge profits pay for their disasters?” (EPA-HQ-OAR-2009-0923-2461-2)

Comment:

“The oil and gas industry must be held accountable for its pollution. Last year it lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive pollution emissions.

This year, the EPA proposes to include the offshore and onshore oil and gas industry in the system. I strongly support that decision.

Please ensure rigorous, detailed, direct pollution measurements. Also include oil and gas industry emissions in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2462-1)

Comment:

“Without total regulation of big industry, our world will gradually be degraded to the point where there is nothing to eat or drink, as whole ecosystems are destroyed. We only have this one earth, and mankind should be bending over backwards to protect and preserve it, instead of exploiting all the resources in the name of greed and corruption.” (EPA-HQ-OAR-2009-0923-2463-1)

Comment:

“There should never again be exemptions, they should never again be allowed to hide the extent of the damage their activities do to the health of the life of the planet, they should not be allowed to refuse third-party scientists and regulators access to their data or their operations when there is such clear evidence that their own statements and assurances cannot be trusted.” (EPA-HQ-OAR-2009-0923-2464-1)

Comment:

“The oil industry has held our Government hostage for too long. It is time to wrestle free from that strangle hold.” (EPA-HQ-OAR-2009-0923-2465-1)

Comment:

“It's time for a change. More information is essential.” (EPA-HQ-OAR-2009-0923-2466-1)

Comment:

“PLEASE ATTENTION Docket No.EPA-HQ-OAR-2009-0923

Dear Administrator Lisa Jackson,

I am writing because I strongly think we need comprehensive pollution disclosure requirements for large polluters, especially greenhouse gas emitters in the oil and gas industry.

It is imperative that we hold ALL POLLUTERS, and especially OIL AND GAS EMITTERS ACCOUNTABLE.

GLOBAL CLIMATE CHANGE IS REAL, and we need the EPA to strongly regulate these emissions.

We need a CAP AND DIVIDEND system to control carbon emissions.

We need STRONG FINES and methods of accountability for the polluters of all toxins: greenhouse/carbon as well as mercury and other toxins.” (EPA-HQ-OAR-2009-0923-2467-1)

Comment:

“Please give a voice to the environment. The voices of greedy profits have long been drowning it out.” (EPA-HQ-OAR-2009-0923-2468-1)

Comment:

“Better yet, no more off shore drilling.” (EPA-HQ-OAR-2009-0923-2469-1)

Comment:

“A larger reason for such measurements is the need to create better accounting for the real costs of the carbon economy. Too much of the damage it causes has been hidden from economic metrix or treated as, infact, a positive measure of GDP. This nonsense must stop so we can build a new, alternative energy economy based on real knowledge of costs and consequences.” (EPA-HQ-OAR-2009-0923-2470-1)

Comment:

“We should have held them accountable before but surely need to do it now.” (EPA-HQ-OAR-2009-0923-2471-1)

Comment:

“I feel this was inevitable, that such a disaster would occur. No way should the corporations get away with hiding anything on this. The public needs to learn to conserve and reduce consumption.” (EPA-HQ-OAR-2009-0923-2472-1)

Comment:

“Enough! Americans have suffered deeply at the hands of polluting industries we deserve and must have transparency. Provide us with the information regarding the effects and depth of destruction the gas and oil industries are heaping on us as a nation.” (EPA-HQ-OAR-2009-0923-2473-1)

Comment:

“I doubt that we have learned enough. In 1979, Pemex had to stop a leak in shallow waters in the Gulf, and it went on for three months before they were able to drill other wells to relieve that leak. That occurred 31 years ago! Until such time that industry can demonstrate more advanced technology to stop leaks, which will inevitably occur, there must be a moratorium on ALL drilling. To do less than that clearly signals that we do not value life above money.” (EPA-HQ-OAR-2009-0923-2474-1)

Comment:

the damage we have already caused. That requires monitoring - by law - the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2480-1)

Comment:

“It has been apparent for a long time that oil companies are more interested in profit than they are in the safety of their workers or protecting the environment. It has also become apparent that BP knowingly and without regard for consequence, proceeded with procedures in the Gulf of Mexico that ultimately resulted in devastation for people and for the environment. It is unlikely that there will be a complete recovery from this disaster. My Gulf Coast home will never regain its market value or its livability. Even were I compensated monetarily, my life will be forever changed.” (EPA-HQ-OAR-2009-0923-2481-1)

Comment:

“This is our only world. Let's get serious about "maintaining" it!” (EPA-HQ-OAR-2009-0923-2482-1)

Comment:

“We need to protect our air, land, and water resources while filling our Nation's energy needs. Development of alternative energy while reducing consumption of carbon-based fuels is key. In the meantime, it is imperative we accurately monitor emissions from oil and gas development. There should be no exemptions. For our children, our grandchildren and future generations, we must be mindful of how we use and develop all the resources in our nation.” (EPA-HQ-OAR-2009-0923-2483-1)

Comment:

“I sit looking out at the Detroit River which was heavily polluted and for which many people are still working to clean up and I think I am lucky not to be still living on Santa Rosa Island in the Gulf. How can we continue to make these mistakes? There must be consequences for their actions. Hold these companies responsible if for no other reason than an example for our children and grandchildren.” (EPA-HQ-OAR-2009-0923-2484-1)

Comment:

“It is obvious that the oil and gas industry must be held accountable, and is no longer able to lobby its way out of the mandatory greenhouse gas reporting rule. Our Government must be able to track its massive global warming pollution emissions. The EPA must be able to set things

right and finally include the offshore -- and onshore -- oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-2485-1)

Comment:

“The oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive emissions. This year, the EPA can set things right and include the oil and gas industry in the system. I support that decision. I urge you to ensure that the system uses rigorous and direct pollution measurements and that the industry's emissions are included in the reporting system soon.” (EPA-HQ-OAR-2009-0923-2486-1)

Comment:

“Please ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2487-1)

Comment:

“Thank you for your time, attention, and action on this matter.” (EPA-HQ-OAR-2009-0923-2489-1)

Comment:

“I grew up in Western Pennsylvania and lived with the coal, oil and gas industries and would never want to repeat that experience. Where are we going to go once we trash this plant? From the pictures from the gulf, we are well on our way.” (EPA-HQ-OAR-2009-0923-2490-1)

Comment:

“Environmental stewardship must be fair. And includes holding big corporations responsible for their part of the equation, too.” (EPA-HQ-OAR-2009-0923-2491-1)

Comment:

“While EPA has outlined pollution disclosure requirements for big pollution emitters, the oil and gas industry has been spared. Now with the Gulf of Mexico oil spill disaster looming large and long on the American public, the question is: why doesn't the EPA impose disclosure requirements of pollution data for the oil and gas industry?”

It is most important that the EPA rein in the oil and gas sector on pollution in order to address global warming. No more coddling the oil and gas sector.” (EPA-HQ-OAR-2009-0923-2493-1)

Comment:

“Who and what is the EPA protecting? Seems like it is all about protecting big business and not about the environment or the citizens of our nation. You work for we the people, not corporate interests. It is time to do what the EPA was meant to do and stop undermining our nations heritage by catering to corporations.” (EPA-HQ-OAR-2009-0923-2494-1)

Comment:

“I couldn't have said it better than what the letter below. I would add just one thing: Why would there be an exemption for the biggest polluters and green house gas emissions emitters? There must be a lot of money involved somewhere in the process. Let's remedy the wrong here and keep it fair and above board.” (EPA-HQ-OAR-2009-0923-2495-1)

Comment:

“And tell BP that layering hay or straw on the slick will help to cleanup the chunk. The oil binds readily with the straw/hay and is then able to be scooped up and sent onto land where the oil can be pressed out of the straw/hay.” (EPA-HQ-OAR-2009-0923-2498-1)

Comment:

“The American public and the citizens of the world have a right to know what is being done to our planet. And the right to make things more clean and healthy.” (EPA-HQ-OAR-2009-0923-2499-1)

Comment:

“We are counting on our government to more closely monitor and regulate these dangerous industries.” (EPA-HQ-OAR-2009-0923-2500-1)

Comment:

“The present administration has been following in the footsteps of the previous administration in many ways, and although vast improvements have occurred, the same old corporate friendly ways of doing business continues to write the script that we ALL have to follow. Please keep in mind that we the people are still supposed to be in charge of this country, NOT the oil, coal, gas, electric, etc. companies.” (EPA-HQ-OAR-2009-0923-2501-1)

Comment:

“As the federal agency responsible for protecting our environment, I hope you will do everything you can to resolve this horrific tragedy as soon as possible and take the necessary steps to ensure something like this will never happen again. As a Florida resident, I am heartsick about the devastation that has resulted from this record setting oil spill. Please...NO MORE DRILLING OFF OUR COASTS. Thank you.” (EPA-HQ-OAR-2009-0923-2502-1)

Comment:

“Individual citizens are under strict pollution regulations but companies and corporations skate by without accountability for their pollution. Please correct this situation.

And by the way, we need the oceans for the production of oxygen. The dead zone being created in the Gulf of Mexico will produce no oxygen. Can you see, like I can, holes in the oxygen layer as being similar to holes in the ozone? No oxygen is a bit more deadly, however.” (EPA-HQ-OAR-2009-0923-2503-1)

Comment:

“Time is running out for us in correcting the greenhouse gas problem. It is imperative that the EPA take action now. Don't let the oil and gas industry continue to destroy this environment.” (EPA-HQ-OAR-2009-0923-2504-1)

Comment:

“RE: Basic factual evidence needed for firm supervision and regulations that matter for our health and safety and for the protection of the environment we live in.” (EPA-HQ-OAR-2009-0923-2505-1)

Comment:

“The public MUST HAVE the right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

WHY - OF ALL INDUSTRIES - SHOULD THEY GET OFF THE HOOK?” (EPA-HQ-OAR-2009-0923-2506-1)

Comment:

“This letter is about pollution in general, and about global warming pollution in particular.” (EPA-HQ-OAR-2009-0923-2507-1)

Comment:

“It is time to stop drilling in our oceans, read the new nickels's logo. That says it all!” (EPA-HQ-OAR-2009-0923-2508-1)

Comment:

“That kind of result from lobbying is one of the reasons that system, also, should be reformed!

They spend the money, they get the result they want!” (EPA-HQ-OAR-2009-0923-2509-1)

Comment:

“After the red light went on with the Gulf Oil Disaster, we must make oil companies accountable for any oil spills, leaks, explosions, etc. We must also work together for clean air energy bill and stop any future offshore oil drilling. WE the people have had enough, the Gulf explosion was the end of offshore oil drilling and the beginning of clean air policy and working towards a better and safer world. Support the EPA proposal to set things straight and include offshore and onshore oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-2510-1)

Comment:

“I understand that there must be a transition period from an oil-based energy system to a renewable one, but the safety regulations must be tightened and several layers of redundancy must be built into the system. likewise, they must report their emissions.” (EPA-HQ-OAR-2009-0923-2511-1)

Comment:

“It is nothing short of a disgrace that these measurements have not been kept track of for the last several years, at least. Let's require and vigorously police the most extensive and detailed emissions reporting ever.” (EPA-HQ-OAR-2009-0923-2512-1)

Comment:

“It is time to hold the oil and gas industry accountable for all the environmental costs of what they do and stop making the U.S. taxpayers foot the bill for the damage they do.” (EPA-HQ-OAR-2009-0923-2513-1)

Comment:

““The Truth Shall Set You Free”.” (EPA-HQ-OAR-2009-0923-2514-1)

Comment:

“I am working on Sierra Club's Cool Cities program here in Carol Stream for local solutions to global warming. However there is only so much that can be done on a local level.” (EPA-HQ-OAR-2009-0923-2515-1)

Comment:

“Specifically, I think we need to have an as built of all oil operations concerning our country. We need inspection dates and who signed off on them. We need inspections schedules, so we can help monitor what has become blatant disregard for our responsibilities. I think all rigs and refinery or oil related operations need to be fully inspected and those findings clearly available to the US citizens. I think there should be a stop to further new oil operations until this type of review is done and judged to be free of corruption in its study. AZ” (EPA-HQ-OAR-2009-0923-2516-1)

Comment:

“EPA has finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action. THE RESULT IS THE HORRIFIC SPILL IN THE GULF AND THE MULTIPLE BP EXPLOSIONS OF NATURAL GAS AND OTHER OIL SPILLS. PUT REGULATION IN PLACE NOW!

Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates. ENOUGH IS ENOUGH! STOP PLAYING POLITICS WITH OUR PLANET AND THE LIVING SPECIES THAT DEPEND ON US TO KEEP THEM SAFE.” (EPA-HQ-OAR-2009-0923-2517-1)

Comment:

“HISTORY WILL SEE YOU AND OTHERS IN GOVERNMENT AS THE ONES WHO HELPED CAUSE ALL OF THIS. DO YOU WANT THAT AS YOUR LEGACY??” (EPA-HQ-OAR-2009-0923-2517-2)

Comment:

“Without a comprehensive reporting and monitoring system the public is unaware of the true, total cost of our fossil fuel consumption. Do what you must to control and report pollution of our earth's environment.” (EPA-HQ-OAR-2009-0923-2518-1)

Comment:

“Please vet any oil company that applies or has applied for a drill permit. Report any that have a poor safety record to the appropriate dept. or committee so it can be determined TRULY if they would be cautious and responsible! If this had been done with BP before this deep well, they might have been refused due to their poor safety record around the world!” (EPA-HQ-OAR-2009-0923-2519-1)

Comment:

“Or maybe we should just stop 'offshore drilling'. Enough damage has been done. There must be another way.” (EPA-HQ-OAR-2009-0923-2520-1)

Comment:

“Big Oil and Gas must be held accountable.

The EPA has decided to put the oil and gas industries within the mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-2521-1)

Comment:

“The future of our planet hangs in the balance. It is imperative that actions are taken to protect it.” (EPA-HQ-OAR-2009-0923-2522-1)

Comment:

“Please protect us from the mistakes of Big Oil. Thank you for doing the very right thing.” (EPA-HQ-OAR-2009-0923-2524-1)

Comment:

“I am a voting US citizen from California living in Canada. I voted for President Obama because I believed he would implement policies to protect our environment.. It is time the EPA acted to protect our environment instead of protecting big oil and big business.” (EPA-HQ-OAR-2009-0923-2525-1)

Comment:

“Do we want to have this happen twice?” (EPA-HQ-OAR-2009-0923-2526-1)

Comment:

“Allowing BP to thumb their nose at the EPA and use dispersants that were banned in the UK ten years ago is an atrocity. Whose country is this? Foreign corporations have put at risk America's natural resources and taxpayers.” (EPA-HQ-OAR-2009-0923-2527-1)

Comment:

“And - coming from Washington state - I have first hand seen the devastation of a much smaller (although huge) oil spill. It's possible that BP has killed the Gulf - a form of war.” (EPA-HQ-OAR-2009-0923-2528-1)

Comment:

“Aside from what the BP disaster has shown us, no industry, no matter how powerful or important should be exempted from rules and laws to monitor and clean up our environment.” (EPA-HQ-OAR-2009-0923-2529-1)

Comment:

“Everyday as I watch the news, I am amazed that such a tragedy could happen in our waters when there is technology in place to prevent it. The only explanation is that negligence and greed took the place of logic by the oil industry.” (EPA-HQ-OAR-2009-0923-2530-1)

Comment:

“We have a right to know about pollution being emitted by the oil and gas industry. Why should they be exempt? They shouldn't be and I hope you will end this loophole.

Your leadership is needed to ensure we have rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. The American people have a right to know the largest emitters of pollution so we can hold them accountable for their emissions.” (EPA-HQ-OAR-2009-0923-2531-1)

Comment:

“As an air-breathing citizen, I want to KNOW WHAT POLLUTANTS ARE BEING SPEWED INTO OUR AIR!” (EPA-HQ-OAR-2009-0923-2532-1)

Comment:

“These oil and gas industries have been let off the hook long enough. Now the time has come to pay for all their deeds of yesterday. Not a day too soon.” (EPA-HQ-OAR-2009-0923-2533-1)

Comment:

“I strongly urge you to hold the oil and gas industries accountable.

There must be mandatory greenhouse gas reporting rule.” (EPA-HQ-OAR-2009-0923-2534-1)

Comment:

“Just like the financial meltdown on Wall Street demonstrated, the environmental disaster in the Gulf of Mexico shows that government regulation is lax to the point of nonexistence. We need across the board strengthening of regulations for all industries: energy, banking, agriculture, insurance and more. Not only is the government not protecting the American public and environment, it's clear that government has been a willing participant in the fleecing of the citizenry. This is most apparent with the cozy relationship between big oil and the Minerals Management Agency. The oil industry must be held accountable for its destruction and ALL drilling must come with appropriate environmental impact reports, redundant safety procedures and criminal prosecution of those that foul our environment due to negligence, greed or stupidity. All offshore drilling must be stopped until big oil can prove that it can prevent the sort of disaster that is now unfolding in the Gulf.” (EPA-HQ-OAR-2009-0923-2536-1)

Comment:

“Please continue trying to hold the oil industry accountable, and to endour slavish dependence on petroleum, a dependence which, as you see,could destroy our oceans and our air.” (EPA-HQ-OAR-2009-0923-2537-1)

Comment:

“I am quite sad after watching the horrible disaster that BP has caused in the Gulf of Mexico. The oil and gas industry should be held accountable, they certainly take the huge profits generated before this. I have learned that the industry lobbied last year its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. Fortunately, the EPA is proposing right now to correct things and to finally

include the offshore - and onshore - oil and gas industry in the system. I support indeed that decision,” (EPA-HQ-OAR-2009-0923-2538-1)

Comment:

“WE MUST SAVE OUR PLANET--STOP THESE EMISSIONS AND GO GREEN. REGULATE EVERYTHING NOW AND CHANGE AT LIGHTENING SPEED TO GREEN TECHNOLOGY.” (EPA-HQ-OAR-2009-0923-2539-1)

Comment:

“Furthermore, the solution to such a devastating oil spill should have been, and must now be, put in place to resolve the problem immediately. No more drilling without solutions to the problems immediately available and the plan to implement the solution in place.” (EPA-HQ-OAR-2009-0923-2540-1)

Comment:

“Without the full data from full reporting, we will be condemned to fail in our efforts to avert climate disaster. If we cannot know with a high degree of confidence, the true costs of our dependence on oil, coal, and other conventional fuels, we will not be able to calculate the viability of alternatives. Please move forward and make the oil and gas industry the cooperating, accountable partner in pursuit of our national interests.” (EPA-HQ-OAR-2009-0923-2541-1)

Comment:

“It is time that we take serious steps to prevent environmental disasters that threaten the viability of our ecosystems on which we depend for food. The Gulf Coast will never return to what it was before this gigantic geyser started spewing oil. We have been playing with fire in an attempt to meet our demand for oil. Please live up to your agency's title and protect the environment at all costs.” (EPA-HQ-OAR-2009-0923-2542-1)

Comment:

“No more. No more pollution, destruction of our environment, our livelihoods, and our planet by the huge business corporations who use their profits to influence the government. We Must hold those accountable who are in the process of destroying the planet for financial gain. We MUST find other sources of energy.” (EPA-HQ-OAR-2009-0923-2543-1)

Comment:

“Please help stop serious pollution of our air, water, and land by holding these huge companies liable for their garbage.” (EPA-HQ-OAR-2009-0923-2544-1)

Comment:

“I am appalled that we have been bullied so long and giving in to the corporate world of oil and gas and their toady accomplices. The profits they relish are obscene, and we the public finance these everywhich way.” (EPA-HQ-OAR-2009-0923-2545-1)

Comment:

“It is time for the EPA to stand up to big oil. Don't let them buy out of it this year..” (EPA-HQ-OAR-2009-0923-2546-1)

Comment:

“please we are all so smarter than to allow the oil industry to do whatever it wants because they think they are doing us a big favor with their dirty dangerous oil rigs. we don't have to kiss big oil's rear end . lets be wise about energy, america is not stupid . we know there is better energy alternatives. the private sector, big business, corporations and the government need to unite together to defeat the global warming demon that confronts the earth . there is no time for business as usual, no time for politics as usual. the economy and the health of the earth must go hand in hand .big profit before earth's good health must stop now . greed must stop now. or our generation will be held accountable for the destruction of the earth . god bless the earth , not the greedy oil companies.” (EPA-HQ-OAR-2009-0923-2547-1)

Comment:

“PLEASE DO WHAT IS RIGHT FOR OUR AMAZING PLANET AND ALL OF LIFE THAT SHE SUPPORTS!” (EPA-HQ-OAR-2009-0923-2548-2)

Comment:

“THIS SAYS IT BEST ! PLEASE TAKE THIS REQUEST VERY SERIOUSLY AND START HOLDING POLLUTERS ACCOUNTABLE ... IT'S WAY PASSED TIME !!” (EPA-HQ-OAR-2009-0923-2549-1)

Comment:

“As a citizen concerned with the health of our environment, which has been under terrible duress from energy development below and above the ground, I entreat you and your agency to protect

the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

We've experienced enough duplicity from energy corporations such as BP that are responsible for pollution on an immense scale.” (EPA-HQ-OAR-2009-0923-2550-1)

Comment:

“The public don't always "get it right" but without information there is no possibility or chance for them to "get it right". Witness the lies spread by Fox news, not by inclusion but rather exclusion. Please don't let corporations lie by exclusion.” (EPA-HQ-OAR-2009-0923-2551-1)

Comment:

“I find it discouraging that this is even slightly controversial. Please do all you can to see that the right thing is done here.” (EPA-HQ-OAR-2009-0923-2552-1)

Comment:

“I appreciate your leadership in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy. How could we consider anything other than making sure we understand how much carbon is being emitted, especially by the biggest emitters?” (EPA-HQ-OAR-2009-0923-2553-1)

Comment:

“Unfortunately, opportunist business people will cut corners every chance they get.” (EPA-HQ-OAR-2009-0923-2554-1)

Comment:

“This is the only planet on which we can live, and we need to protect it from any more harm that the oil and gas businesses might inflict on it!” (EPA-HQ-OAR-2009-0923-2555-1)

Comment:

“I am writing to urgently request that you protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2556-1)

Comment:

“I applaud your proposal to mandate disclosure of this information, and I ask you to please implement this proposal.” (EPA-HQ-OAR-2009-0923-2557-1)

Comment:

“The destruction of our country and the environment by corrupt industries must stop NOW! No amount of money in one's pocket can justify the irresponsible and irreversible degradation of our planet.” (EPA-HQ-OAR-2009-0923-2558-1)

Comment:

“Our planet is in peril and this current disaster shows us once and for all that we cannot have uncontrolled offshore drilling. It's time for reasonable, enforced regulation of BP and the other oil and gas companies. The alternatives is permanent ecological disaster. We are fouling our own nest. It has to stop.” (EPA-HQ-OAR-2009-0923-2559-1)

Comment:

“I am disgusted by the BP disaster!” (EPA-HQ-OAR-2009-0923-2560-1)

Comment:

“Lets not let the nations worst environmental disaster go un-noticed in policy. We must make the correct choices so this can never happen again.” (EPA-HQ-OAR-2009-0923-2561-1)

Comment:

“Haven't we done enough to our beautiful Earth?? Stop them from completely distroying Her.” (EPA-HQ-OAR-2009-0923-2562-1)

Comment:

“Real Responsibility is what must come to pass.

If corporations want to be treated as citizens with full lobbying rights then their controlling owners should be sent to jail for this assault on our world. Their assets should be confiscated and used to pay for putting us back on track. The managers are just lackeys so sending them to jail accomplishes little besides punishing a master's slaves for the crimes of the master. Executives have to take responsibility into consideration when they do something. They

obviously didn't do it enough in development of their deep sea drilling operations. If they couldn't back out of something if it went sour they should not have done it.

Make them take responsibility for the good and the evil that they bring into the world.

We need to take steps now to ensure continuity of that which is most important. What do we value and cherish the most that should still stand a 1000 years from now as well as today?" (EPA-HQ-OAR-2009-0923-2563-1)

Comment:

"stop offshore drilling now." (EPA-HQ-OAR-2009-0923-2564-1)

Comment:

"This incident was the culmination of one "mistake" after another in the pressures to minimize costs - which translates into an increased acceptance of risks - which in turn translates into occasion disasters such as the present BP matter, which may not be undone in our lifetimes.

There is no justification for this negligence and I am dumbfounded as to why there is any cap on liability for BP." (EPA-HQ-OAR-2009-0923-2565-1)

Comment:

"Our Environmental Protection Agency has proposed to set things right by including the offshore - and onshore - oil and gas industry in the system of mandatory greenhouse gas reporting. We strongly support that decision. From the top down, please ensure that the system uses rigorous, detailed, direct, i.e., scientific, pollution measurements.

Thank you for doing this ASAP." (EPA-HQ-OAR-2009-0923-2566-1)

Comment:

"Keep inspectors from accepting perks from those whose industry they inspect. Require closer monitoring of operations. Don't take any corporations word that it has made its operations safe for people and for the environment.

Close the loopholes opened by Cheney and Bush!" (EPA-HQ-OAR-2009-0923-2567-1)

Comment:

“The Navaho Elders have long predicted our environmental demise, and our time may well have run out to change the course of our destruction of Mother Earth. But we can still act now to right the oil and gas industry" wrongs.” (EPA-HQ-OAR-2009-0923-2568-1)

Comment:

“As an informed administrator, you know far more than I do about who is producing most of the nation's pollution and what to do about it. I'm urging you to do your utmost to gather reliable information on them and to inform the public. Our planet's future is at stake!” (EPA-HQ-OAR-2009-0923-2569-1)

Comment:

“My husband and I have two wonderful daughters. We have taught them to "leave a place better than you found it" when we go camping, hiking and kayaking. We have taught them to treasure the Earth / our home - please see that the EPA starts holding Big Oil companies accountable.” (EPA-HQ-OAR-2009-0923-2570-1)

Comment:

“i hope we do not allow big oil/big money to dictate our future. i urge you to act as though this is the only chance we get on the only earth we have.” (EPA-HQ-OAR-2009-0923-2571-1)

Comment:

“It's time we learned that there is nothing that is 100 percent safe. The oil companies cannot guarantee the perfection of off-shore drilling. We need alternative energy NOW!! All offshore drilling must be BANNED. We must save our wildlife first and foremost. How many signs do you need to change direction?” (EPA-HQ-OAR-2009-0923-2572-1)

Comment:

“Enough already with protecting the oil and gas industry. This latest disaster in the Gulf should certainly show everyone that these large corporations must be held accountable for their actions and in the case of BP, should be made to pay (and pay heavy) for the clean up, not the people and not our government. But most importantly, off-shore drilling must be stopped.” (EPA-HQ-OAR-2009-0923-2573-1)

Comment:

“This industry is one of the biggest polluters. They should not be exempt.” (EPA-HQ-OAR-2009-0923-2574-1)

Comment:

“(SFI) - DO THIS NOW!!!! WE ARE ALREADY WELL INTO THE "SIXTH GLOBAL MASS EXTINCTION EVENT"!!!! WE NEED TO PUNISH THE ONES WHO WERE STUPID ENOUGH, AND ARROGANT ENOUGH, NOT TO HAVE ADEQUATE ALTERNATE BACK-UP PLANS IN CASE THIS HAPPENED!!!!!! IT'S IMPOSSIBLY STUPID!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-2575-1)

Comment:

“The grim spectacle of the BP disaster unfolding in the Gulf, bringing us to our knees and destroying our water, should teach us that the oil and gas industry must be held accountable.” (EPA-HQ-OAR-2009-0923-2576-1)

Comment:

“As far as I'm concerned, the entire fossil fuel industry is a similarly slow but much greater pollution disaster destroying my city. This recent event in the Gulf is not at all unusual in a generic sense.

For once in my life we have a president who has the political leaning and should have the political will AND OPPORTUNITY to really put a stop to the local and global disaster of fossil fuel use. Please take any and all steps to stop and/or slow down the entire fossil fuel industry.” (EPA-HQ-OAR-2009-0923-2577-1)

Comment:

“What's more, it appears that it will never be possible to avoid severe environmental damage. For this reason, I believe we should allow NO MORE offshore drilling.” (EPA-HQ-OAR-2009-0923-2578-1)

Comment:

“No more exemptions, no more free rides for the big oil companies. No more Bush era policies, please.

Keep up the good fight!!” (EPA-HQ-OAR-2009-0923-2579-1)

Comment:

“Also, I strongly urge that the oil and gas entities be held accountable for reparations and damages incurred as result of drilling operations, no exceptions or discounts.” (EPA-HQ-OAR-2009-0923-2580-1)

Comment:

“The time for this is incontestably now.” (EPA-HQ-OAR-2009-0923-2581-1)

Comment:

“We are currently witnessing, before our very eyes, the very real cost to the environment from the oil and gas industry - THEY MUST BE HELD ACCOUNTABLE, and provide accurate and comprehensive data about the environmental costs of their industry.” (EPA-HQ-OAR-2009-0923-2582-1)

Comment:

“I can no longer wrap my head around the benign indifference that is being displayed by the oil companies. We went from drill baby drill...to spill baby spill...to...kill baby kill....How ludicrous is that????????? Stop playing crap shoot with the next generation's legacy. Youv'e made your money ...Now show some decency and responsibility.....Clean up your act. Hey...Oil Robber Barons....Your business practices stink! The American Public needs a voice...that counts. Pander speak is just not going to cut it....this time...too little too late.” (EPA-HQ-OAR-2009-0923-2583-1)

Comment:

“Our land and water may be possible sources for oil and gas but it is the responsibility of our government to insure that there are procedures established and monitored so that these resources are adequately protected. The reports about the oil and gas companies practically controlling the elements of government responsible for drafting and enforcing protective measures should never be tolerated in our society.” (EPA-HQ-OAR-2009-0923-2584-1)

Comment:

“Both my wife and I are opposed to all the loopholes that our legislators are prone to write into every bill. We are heated by your intention of including the oil industry "in" the laws governing greenhouse gas and other pollutants.

Way to go!” (EPA-HQ-OAR-2009-0923-2585-1)

Comment:

“We all our lives are a stake in this issue and will effect our ability to substain life on this planet. Key West is so small of an island an mistake like this is going to effect us really bad because we are surrounded by water. It is our escape to be out on the ocean .You cant compare a man made attraction to key west by far the natural beauty is god given.” (EPA-HQ-OAR-2009-0923-2586-1)

Comment:

“This disaster is a tragedy that will last a lifetime. Please don't let it happen again. There is not enough money in the world to replace what will be lost, so don't let the oil companies pull one over on us.” (EPA-HQ-OAR-2009-0923-2587-1)

Comment:

“It just might stop another BP-type disaster if you will!!!” (EPA-HQ-OAR-2009-0923-2588-1)

Comment:

“My kids and I enjoy breathing what we hope is clean air - you can help me be sure it is. Please take the message below seriously.” (EPA-HQ-OAR-2009-0923-2589-1)

Comment:

“We need for the EPA to be taking a much stronger stand to protect our environment. You should be requiring BP to disclose every ingredient in the dispersants used and standing over them to make sure they are doing everything possible to clean up the environmental disaster they have caused. Our citizenry is counting on you to reign in the oil and gas industries.” (EPA-HQ-OAR-2009-0923-2590-1)

Comment:

“Ironically, the worst offenders re: industrial pollution may be the most protected form disclosure.” (EPA-HQ-OAR-2009-0923-2591-1)

Comment:

“The Energy Industry has managed to delay disclosure of its industries' climate-changing pollution.” (EPA-HQ-OAR-2009-0923-2591-2)

Comment:

“We need to work together to solve environmental problems. Transparency is the only way to go.” (EPA-HQ-OAR-2009-0923-2592-1)

Comment:

“Full disclosure is an absolute must. Please see that it gets done.” (EPA-HQ-OAR-2009-0923-2593-1)

Comment:

“NOT OIL BUT JUST AS DEADLY!

Why aren't ghost and mud shrimp on an endangered list? (i.e. 90 percent declines NOAA ! Please read below.) Why are oyster growers still spraying carbaryl for shrimp control in Wa state?

An open letter to President Obama, and Lisa Jackson,

Please issue an executive order outlawing all aquatic pesticides being applied to our estuaries. The recent listing of the Pacific Smelt as threatened along with WSDA Kim Patten's revelation concerning 90 percent major declines of ghost and mud shrimp at the Department of Agriculture's Burrowing Shrimp Conference held March 12th, 2010 in Long Beach Wa, should at the very least, inspire you to stop this poisoning /polluting of our waters. These chemicals, carbaryl, glyphosate, imazapyr and other inert chemicals used or endorsed by certain oyster growers(PCSGA)are decimating our fisheries. Oyster FARMING is not a fishery. They are not even NATIVE! Please SAVE OUR WHALES, SALMON and other NATIVE fish by saving the food chain!

Between accidental spills and deliberate polluting, marine life does'nt have a chance!

After researching gray whale migrations following the recent wave of apparent starvation deaths, it became clear to these whale watchers what is probably happening. Since the beginning of time these massive creatures migrated along our coast feeding in and out of estuaries on mud and ghost shrimp. Today however, a powerful and greedy Pacific Coast Shellfish Growers Association somehow acquired a free pass since 1964 to chemically eradicate shrimp in Willapa Bay and Grays harbor, Wa. The shrimp populations have been decimated to near extinction!

Take two large estuaries out of the equation and, well, your getting the pictures!(5 DEAD WHALES IN A WEEK)

Here's the kicker; The Wa. state Department of Ecology is still giving out permits to aerial spray carbaryl for more shrimp control! PLEASE RESEARCH! We are not making this up! Save a whale and possibly yourself, DON'T EAT CHEMICAL FLAVORED OYSTERS!" (EPA-HQ-OAR-2009-0923-2594-1)

Comment:

“Our environment is the most important thing for sustaining life on Earth. No other issue compare to this.” (EPA-HQ-OAR-2009-0923-2595-1)

Comment:

“I constantly view significant amounts of pollution being emitted from both large and small companies as I travel around the country. While the previous administration condoned such pollution, I am hopeful that the currenrt administration will be more forthcoming in protecting the health of our people and the enviornment. In that context, please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2596-1)

Comment:

“It is time for all corporations, especially the oil and gas industry, inlight of the Gulf oil disaster, to take full accountability. There is no excuse why they can't or shouldn't. Their profits are definitely high enough, even during these tough times, when many of us Americans struggle to make ends meet. So the oil and gas companies should be held accountable for their mistakes, rectify them with their own profits, and keep the government and public informed through reports on their emissions, etc. I strongly support what the EPA is proposing by finally including the offshore - and onshore - oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-2597-1)

Comment:

“Please pay attention, the planet is being even more polluted.” (EPA-HQ-OAR-2009-0923-2598-1)

Comment:

“We have all been watching the grim BP disaster unfolding in the Gulf. One thing that is clear is that we have not done enough to hold the oil and gas industry accountable for the profound impacts that it has on the environment and all creatures, including us, whose lives and livelihood depend on it.” (EPA-HQ-OAR-2009-0923-2599-1)

Comment:

“Let's not all stand around and point fingers. We know what the problem is, and how it's been generated.” (EPA-HQ-OAR-2009-0923-2600-1)

Comment:

“We need to regulate this industry unless we want another mess on our hands. Its irresponsible and unacceptable for this to happen again. Maybe, just maybe, our government can do what the people want as well and start to get us off the oil-its an archaic, extremely dangerous form of energy and the people do not want it.” (EPA-HQ-OAR-2009-0923-2601-1)

Comment:

“End ALL offshore drilling by 12-31-10.” (EPA-HQ-OAR-2009-0923-2603-1)

Comment:

“CREATURES, ECOSYSTEMS, AND BEAUTIFUL ANIMALS LIKE WHALES, DOLPHINS AND TURTLES ARE DYING RIGHT NOW IN THE GULF OF MEXICO! PLEASE MAKE THE RIGHT DECISION SO THIS DISASTER NEVER EVER HAPPENS AGAIN!” (EPA-HQ-OAR-2009-0923-2604-1)

Comment:

“This profit more attitude at the expense of others is a policy that must stop.” (EPA-HQ-OAR-2009-0923-2605-1)

Comment:

“Again, we are allowing big corporations avoid the rules and accountability for their egregious disregard of the environment. Enough is enough!” (EPA-HQ-OAR-2009-0923-2606-1)

Comment:

“Why should these companies getaway with murder?” (EPA-HQ-OAR-2009-0923-2608-1)

Comment:

“I don't mind paying higher prices for energy if it's clean/safe energy! And, yes, I live on a very tight budget already.

Please take away the power of the mega corporations with their deep pockets and put it where it belongs - with the agencies charged with representing citizens who can't afford to bribe you!!” (EPA-HQ-OAR-2009-0923-2609-1)

Comment:

“What BP has done is appalling and unforgivable. This company, led by eco-murderers, because of their carelessness, lack of respect or any regard at all for life and the environment, gambled and lost. Their greed, dishonesty and rampant criminality has resulted in massive destruction. They set in motion an earth-killer which will play out in future years, long after these human agents of destruction are gone. Now, they are trying with true criminal smarts to use whatever system there is to lessen their accountability and, and, of course, their monetary accountability. This last item is virtually impossible for anyone of pay, but they must be held accountable to the people whose lives they have destroyed. The Gulf fisheries, birds, turtles, crabs, shrimp etal - are eliminated. They are, pure and simple, eco-criminals of a magnitude we have not seen before. Don't let them off!” (EPA-HQ-OAR-2009-0923-2610-1)

Comment:

“I grieve for the families who lost loved ones on the BP oil rig and for the small business people in the fishing and tourist industries, whose livelihood has been severely damaged by the BP oil spill, which even now is continuing.” (EPA-HQ-OAR-2009-0923-2611-1)

Comment:

“When are you going to do your job? It is time to be responsible and not get bought-off. I encourage you to stand behind the law and the American people and protect us from shoddy, corrupt snake oil pushers; You know the Ones I'm talking about.” (EPA-HQ-OAR-2009-0923-2612-1)

Comment:

“It now appears that the oil will be gushing into the ocean for months, causing intolerable levels of environmental damage. If paying the full costs of this spill should put BP out of business I think that might be a good thing. Then other oil companies will decide to forgo offshore drilling permanently. The world can't afford another spill this big. It's time to put every effort into

finding safe sources of energy (not nuclear--one accident there could be one too many) and start getting serious about conservation, maybe rationing gas to push people out of their SUVs and into small, hybrid or all-electric cars. Industry profits aren't the most important thing anymore!" (EPA-HQ-OAR-2009-0923-2613-1)

Comment:

"Stop letting these super rich giants buy everybody." (EPA-HQ-OAR-2009-0923-2616-1)

Comment:

"Keep standing up to the so-called big guys. The truth is that we the people are the big guys, and we elected President Obama because he will stand up for us!" (EPA-HQ-OAR-2009-0923-2617-1)

Comment:

"Oil and gas facilities MUST be included and MUST be held accountable. It is time to stop treating them with kid gloves!" (EPA-HQ-OAR-2009-0923-2619-1)

Comment:

"The oil and gas companies need to be part of the solution...not the problem. They have the resources to manage their environmental responsibilities but they lack the commitment. They are stealing our clean air and water and placing our way of life in jeopardy without consequences. As such, we need to get the facts so we can take the appropriate actions...with or without them. Enough is enough." (EPA-HQ-OAR-2009-0923-2620-1)

Comment:

"Thank you. We wholeheartedly are engaged in environmental issues and justice for our world and all peoples. Thank you for your efforts." (EPA-HQ-OAR-2009-0923-2621-1)

Comment:

"We have now lost a coast of Alaska and now the gulf for the rest of our life time. It is quite possible that we have lost it for our children's life times as well. We need to stop treating Earth like its a temporary home. The economics in the gulf region is now lost. It will now be a dead zone." (EPA-HQ-OAR-2009-0923-2622-1)

Comment:

“We need tight regulations and good oversight of any drilling off our coasts and we need to move as quickly as possible towards alternative energy. Global Climate Change is upon us and is an urgent problem we need to address. Government needs to do their job.” (EPA-HQ-OAR-2009-0923-2623-1)

Comment:

“Obama's Administration said he would invest in solar and wind energy. I have yet to see that really happen with big money. Please help that happen.” (EPA-HQ-OAR-2009-0923-2624-1)

Comment:

“Mandatory reporting of onshore and offshore oil drilling GHG for the oil industry is essential for America to set a baseline and know what our emissions are. Every business in America should be held to the same rules.” (EPA-HQ-OAR-2009-0923-2625-1)

Comment:

“Proper administrative oversight won't completely prevent disasters like the Deepwater Horizon spill, but they can improve oversight and cleanup. That's one thing I hope we have learned from watching the grim BP disaster unfolding in the Gulf. For too long, the extraction industries have written the rules and lobbied for how those rules are enforced. Now they have ruined our precious coastline, and it won't be the same in my lifetime. Partly this began a long time ago, but it continued as recently as last year, when the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-2626-1)

Comment:

“Until we hold industries accountable for the pollution they cause, we will have no chance of improving our environment.” (EPA-HQ-OAR-2009-0923-2627-1)

Comment:

“Let us not be so naive that when faced with the choice of massive profits or massive profits minus the cost of pollution control that the oil giants (more especially foreign ones) will opt for the latter. The EPA must be given the funding and legislative support to monitor emissions and when necessary to penalize infractions severely. Global warming and oil spills cannot be tolerated. Our national resources are vital to our national strength and well being. It is very disheartening and disappointing to see how federal regulators continue to rely on the corporate

"honor system" for self policing. I did not vote for the Democratic ticket in the past national election to tolerate this lack of insight and muscle displayed with critical environmental issues. I have been a loyal Democrat all of my life and I am strongly considering switching to an Independent. The Democratic Party has strayed from its traditional values which I still abide by. Why should I stay?" (EPA-HQ-OAR-2009-0923-2628-1)

Comment:

"If the average person had engaged in deceptive practices resulting in multiple human deaths and the wanton destruction of personal property and catastrophic degradation of the environment they would be criminally prosecuted for, at the very least, negligent homicide among other charges. Why then do we not hold corporations accountable for their destructive practices, and why do we not establish tighter restrictions and guidelines to make sure they are not able to engage in such deceptive and destructive practices.

Further, let's make it clear that the decision-making executives in the oil & gas industries will be held criminally accountable for any deviation from those established guidelines that result in such catastrophic disasters like the one we are witnessing in the Gulf of Mexico. I am sickened and outraged that we've allowed them such latitude in the past. Can we please finally learn from our mistakes?!!!!!!" (EPA-HQ-OAR-2009-0923-2629-1)

Comment:

"WHY IS IT THAT IT TAKES SUCH DRASTIC MEASURES TO WAKE ANYONE UP. THIS OIL SPILL, AS IN THE EXXON VALDEZ, WILL NEVER BE TOTALLY CLEANED UP. THE ECOSYSTEM ONCE MORE UNBALANCED. THE OIL COMPANIES MAKE THE PROFITS FROM THE DRILLING AND ARE RESPONSIBLE AS TO THE ACTIONS OF THEIR WORK. BE ACCOUNTABLE FOR THE RESULTS OF YOUR ACTIONS. HOPEFULLY YOU WILL MONITOR YOUR EQUIPMENT AND KEEP ACCURATE RECORDS. NO MORE LOOPHOLES!" (EPA-HQ-OAR-2009-0923-2630-1)

Comment:

"Clean air is important. Please consider to protect our air and the future of our children." (EPA-HQ-OAR-2009-0923-2632-1)

Comment:

"One of the principal foundations of a successful democracy is openness/transparency. Some progress has recently been made in this area in W/DC, but the most recent environmental tragedy and the way that BP has handled it (e.g. inaccurate numbers and false promises) is a strong signal

to take action. The health and survival of people and this earth requires strong and effective action now.” (EPA-HQ-OAR-2009-0923-2633-1)

Comment:

“I am surprised/shocked to see that pollution disclosure is not already required by oil and gas industries.” (EPA-HQ-OAR-2009-0923-2634-2)

Comment:

“I am writing to urgently request that the EPA establish global warming pollution disclosure requirements for the oil & gas industry. This is imperative in order to provide the public with necessary information and to ensure transparency and accountability necessary to ensure the protection of our environment. It is intolerable to allow the oil & gas industry to continue to push to delay this protective action.” (EPA-HQ-OAR-2009-0923-2635-1)

Comment:

“DON'T LET THE OIL & GAS INDUSTRY GET AWAY WITH THE MANDATORY GREENHOUSE GAS REPORTING RULE. NO EXCUSE FOR GIVING IN TO THE INDUSTRY'S LOBBIESTS AGAIN. TAKE ACTION ON THE EPA'S PROPOSAL TO INCLUDE THE OFFSHORE AND ONSHORE OIL AND GAS INDUSTRY IN THE SYSTEM...MAKE THIS SYSTEM A STRONG, ALL INCLUSIVE, POLLUTION MEASUREMENTS RULE WITH NO LOOPHOLES. THIS IS IMPORTANT TO US, THE CITIZENS, AND TO THE ENVIRONMENTAL FUTURE OF THIS GREAT COUNTRY THE U.S.A.....THINK SERIOUSLY ABOUT IT...THANK YOU MADAM.!!!!” (EPA-HQ-OAR-2009-0923-2638-1)

Comment:

“The Deep Horizon catastrophe was too big to hide. The fossil fuel industry's accidents are frequent and locally destructive, but we rarely hear about them. For instance, a few weeks ago, tornados came through Arkansas and struck the tiny little town of Scotland. We did not hear that the storms blew down two rigs which both caught fire. Even though I am an Arkansas resident, I did not learn of these events until a recent conversation with a Scotland resident. Further, the pump station near Scotland has caught fire twice since it was installed- only within the past two years.” (EPA-HQ-OAR-2009-0923-2639-1)

Comment:

“Let's make all the oil companies follow the law and not side step any of the rules in place that protect our environment. The money they spend on lobbyists could have bought the safety protection that would have stopped what happened in the gulf this year.” (EPA-HQ-OAR-2009-0923-2640-1)

Comment:

“If regulation of greenhouse gases is to be effective at all, we need to monitor every relevant industry.” (EPA-HQ-OAR-2009-0923-2641-1)

Comment:

“No foreign corporation with a history of criminal conduct and murdering Americans should be allowed immunity. And yet that is just what has happened. BP was involved in Exxon spill which has left permanent scars on Prince William Sound. 20 years later species have not come back. Workers for the corporation perished in an explosion in Texas. All of these events were due to negligence on the part of BP which avoided any severe penalty in each instance.

Now we have the Horizon spill which has dumped millions of barrels into the ocean and continues at this moment. Workers for BP testified that upper management was aware of safety issues but ordered the drilling to continue. Now more Americans are dead and the wildlife and income of the citizens of Louisiana and Texas have been destroyed. The US government sits back and watches BP make one blunder after another in the attempt to cover its incompetence in stopping the spill. Even now the greed of this corporation is evident as it refuses to use the one method that will permanently seal the well. BP could blow up the well but refuses to do so because future extraction would be prevented. BP is concerned with one thing above all else; profit and not safety or responsibility.

How long will the EPA allow these criminal corporations to behave with absolute impunity? What fine can match the loss of human life, the loss of species, income and the impending disaster that will ensue when hurricane season arrives and the chemical dispersants appear in the water supply and nostrils of Louisiana residents?” (EPA-HQ-OAR-2009-0923-2642-1)

Comment:

“I am writing to express my strong support for the decision by the EPA to require that the oil and gas industry report its greenhouse gas emissions.” (EPA-HQ-OAR-2009-0923-2643-1)

Comment:

“It is painfully obvious that our government has let us down, by allowing companies to destroy the gulf of Mexico, without having even a clue how to handle such a huge spill. In the pursuit of money fueled by greed, an ocean has been destroyed. We can not afford another such. It is high time to stop all off shore drilling.” (EPA-HQ-OAR-2009-0923-2644-1)

Comment:

“It is both appropriate and necessary to have a full and accurate accounting of greenhouse gas pollution. We are way behind other nations in efforts to curb greenhouse gas emissions, and we need substantive action from our government on this matter.” (EPA-HQ-OAR-2009-0923-2645-1)

Comment:

“The fossil fuel industry depends on government approval for access to public lands and hence is accountable to the public when it abuses that privilege. If the oil and gas companies cannot abide by strict rules of conduct, they should have this privilege immediately withdrawn.” (EPA-HQ-OAR-2009-0923-2647-1)

Comment:

“The life in the Gulf dies by human hand, one way or another, so just collect all the dead and deep fry them in the petroleum oil they're soaked in. Serve it to tourists and all your cronies.” (EPA-HQ-OAR-2009-0923-2648-1)

Comment:

“The oil industry has had favorable tax treatment for too long and the money they have spent lobbying could have been better utilized to develop safety procedures and to work on green energy projects.” (EPA-HQ-OAR-2009-0923-2650-1)

Comment:

“It makes you wonder why the big oil and gas industry polluters so adamantly oppose doing what is right. There should be no exceptions; if the large global warming polluters will not disclose the information on their own then regulations must be passed to force them to do so. Why are they so concerned about the disclosure requirements - environmental protection is a detriment to their profit at best and the disclosure requirements for emissions would force them to be more environmentally responsible or risk the wrath of a public that is angry at policies that favor the special interests over protection of our environment.” (EPA-HQ-OAR-2009-0923-2652-1)

Comment:

“We are a people on a sphere of balance we call earth. Once completely adulterated, we all die. Natural, nature, beautiful, sacred, once upon a time. We humans are the disease. Losing sight of what exactly makes us human. In the grand scheme of things it's ok, we are only creating our own extinction, and to be a casualty of this war for balance we absolutely will find ourselves deservingly so, on the losing end, until we are screaming WHY into a hollow, echo less world, and your last breath has become humanities....” (EPA-HQ-OAR-2009-0923-2653-1)

Comment:

“OIL & GAS COMPANIES ARE DESTROYING OUR ENVIRONMENT. THEY MUST BE HELD ACCOUNTABLE FOR THEIR ACTS.” (EPA-HQ-OAR-2009-0923-2654-1)

Comment:

“It is disgraceful that big corporations, such as BP and Massey, place profits above human lives and the environment. We must do everything we can to keep track of what they are doing and prevent future disasters.” (EPA-HQ-OAR-2009-0923-2655-1)

Comment:

“My heart and the hearts of people in the world are pained with this destruction of our beautiful planet and its' creatures.” (EPA-HQ-OAR-2009-0923-2658-1)

Comment:

“USA Taxpayers are paying Hundreds of Billions Right Now for Health and Environmental damages caused by Oil, Coal and Livestock industries pollution. Make these Medieval Robber Barons pay Their Rightful Share for the Pollution they cause and it will Improve our both Economy and National Security. USA Taxpayers cannot Afford to keep Subsidizing Oil,Coal and Livestock Industry Pollution.” (EPA-HQ-OAR-2009-0923-2659-1)

Comment:

“There needs to be more oversight into every proposed oil drilling project including the equipment and plans for the unexpected possible problems which drilling can create for all phases of the project and massive gobal warming pollution emmissions. The oil and drilling companies are responsible for the whole mess and not the tax payors. This situation is totally

unacceptable period and it may take additional 3 months to resolve. Good God man, greed, creed and profits.” (EPA-HQ-OAR-2009-0923-2660-1)

Comment:

“Long before the current Gulf oil spill fiasco I have been urging our society - through business and government - to assess the "true" cost of any business or enterprise that seeks to trade goods or services. If you sell groceries in plastic bags what are you paying to reduce the proliferation of waste bags in the environment. One model of this is the "sur-charge" on bottles & cans in states such as ME, CA, VT, NY, and others. The idea is that if you profit from a trade that causes an expense due to your activity then your activity must be taxed in some way so that the true cost is incurred. So the expense of oil and gas exploration and extraction should be assessed.” (EPA-HQ-OAR-2009-0923-2662-1)

Comment:

“It is time to make all of this transparent - we need to drill but we also need to ensure that in the process all safeguards are in place and additional pollution of our waters - rivers and oceans - are not in jeopardy. It is way past time to hold this industry accountable for their actions. Otherwise what good are our government agencies except money pits for wasting our tax dollars?” (EPA-HQ-OAR-2009-0923-2663-1)

Comment:

“I HEAR THAT THE AMERICAN PEOPLE MAY BE PICKING UP THE BILL FOR THE BP OIL DISASTER. THIS IS JUST STUPID AND CRAZY! LAST YEAR THE INDUSTRY LOBBIED ITS WAY OUT OF THE MANDATORY GREENHOUSE GAS REPORTING RULE. THIS IS ALSO STUPID AND CRAZY.” (EPA-HQ-OAR-2009-0923-2664-1)

Comment:

“Act for the people's health and safety... not for the corporations' profits.” (EPA-HQ-OAR-2009-0923-2665-1)

Comment:

“The impacts from an oil well gone wild are now horribly clear and sadly horrifically wide spread. The US government can permit but must condition permits so that the recipient is held fully accountable for mistakes and for the extensive disruptions to our global ecosystem. The US government must not take on this responsibility as it did with the super fund to clean up toxic

waste sites. Instead, it must demand that a permittee extract cleanly and be held accountable if they cannot.” (EPA-HQ-OAR-2009-0923-2666-1)

Comment:

“They are putting forth one possible method to stop the current on going disaster. Then spend time exposing how are they assembling the parts, and getting everything together. When the method fails, they restart the process. They should have several teams doing the preliminary work for several proposed methods in parallel to shorten the time line. This shows their disdain for the earth and the the health of the earth's biosphere! Their only concern is getting more money.” (EPA-HQ-OAR-2009-0923-2667-1)

Comment:

“As with banking, so it is with the oil and gas industry (and seemingly all corporations): deregulation has failed. The ideal of profit over responsible practices has failed miserably. I have had it with industry getting away with failure and disasters, only to be bailed out by taxpayer money while the Executive and Legislative Branches facilitate more of the same. Enough! If the oil and gas industries want to drill onshore or offshore, they must be responsible for cleaning up the mess when things go wrong. Also, proper assessment of risk must be addressed before drilling or building pipelines. Also, it's time for lobbyists who buy off politicians to be sent packing.

If the government refuses to hold industry accountable for its failures and disasters, please know that taxpayers will show displeasure by sending politicians packing for failure to protect the public interest: in this case, the environment and responsible management of public funds. Industry must be held responsible for emissions and for cleaning up its own messes. And the government must stop enabling risky industrial practices by helping industry skirt environmental impact reporting, risk assessment, and responsible leasing practices.

It's past time for industry to conduct itself responsibly as in a substantive responsible manner, not just by way of perception manipulation. There must be real rules to address real problems. And those rules must be respected and enforced.” (EPA-HQ-OAR-2009-0923-2668-1)

Comment:

“It is CRIMINAL to sacrifice the FUTURE OF OUR PLANET for corporate profit.” (EPA-HQ-OAR-2009-0923-2669-1)

Comment:

“Please put the cost of cleanup on the price of fuel.” (EPA-HQ-OAR-2009-0923-2670-1)

Comment:

“You have the opportunity to REALLY DO SOMETHING for our environment by making the oil companies FINALLY TOE THE LINE.” (EPA-HQ-OAR-2009-0923-2672-1)

Comment:

“I know that you are from the Gulf area and I therefore think that you would like to have GHG Emissions monitored as accurately and fully as possible. This is crucial to our fight against global warming. There will be bad news too.” (EPA-HQ-OAR-2009-0923-2673-1)

Comment:

“WE NEED TO HOLD THEIR FEET TO THE FIRE! ! !” (EPA-HQ-OAR-2009-0923-2674-1)

Comment:

“I don't want to be in the dark about Big Oil any longer. Obviously, I can't fully trust my country's government to CAREFULLY watch dog the environment. PLEASE do a TOP TO BOTTOM review of any and all regulations regarding exploration and drilling for oil. Better yet, all of us need to reevaluate the risks involved in our oil and gas addiction. I'm walking more and THINKING before I drive anywhere. I will be watching and waiting for more news regarding how my government relates to BIG OIL in the future. Nothing could be more important to leaving a safe and cleaner world for my grandchildren.” (EPA-HQ-OAR-2009-0923-2675-1)

Comment:

“We live in the environment so this is really important because I like being alive rather than sick and dead. I know politics must be fun and helping the big, rich corporations must seem like even more fun, maybe even as good as a popsicle on a really hot day, but I think not dying is even more fun. What do you think?” (EPA-HQ-OAR-2009-0923-2677-1)

Comment:

“THE ONLY REASON THEY DON'T WANT TO DISCLOSE POLLUTION INFORMATION IS THAT THEY HAVE BAD STUFF THEY WANT TO HIDE--ANY OTHER REASON IS JUST MORE OBFUSCATION BALONEY !!!” (EPA-HQ-OAR-2009-0923-2678-1)

Comment:

“In a blatant display of the "pass the buck, avoid personal responsibility" that so many Republicans show, Rush Limbaugh called upon the people who have been warning about this kind of disaster, to clean it up, instead of the people whose irresponsibility created in it the first place. Let's make the coal companies and the oil companies and others who skirt regulations pay for their irresponsibility.” (EPA-HQ-OAR-2009-0923-2681-1)

Comment:

“The correction of some of the failures of the EPA would help to start a process of re-establishing the government oversight that is required for a functioning democracy. It would perhaps also enable some Americans to start to believe that their government sometimes works for them and not for the purpose of maximizing corporate profits.” (EPA-HQ-OAR-2009-0923-2682-1)

Comment:

“Environmental abuse should be a felony. It cheats the people and animals and all living things. No entity should be soooooo big that they can act irresponsibly without serious consequences.” (EPA-HQ-OAR-2009-0923-2683-1)

Comment:

“Above all, safety measures must be insisted on that will avoid other such disasters as that we are witnessing in the Gulf of Mexico now. If drilling is to continue there or elsewhere, before it is permitted, measures must be developed to successfully and immediately combat consequences of such an accident. It is certainly dangerous to the entire ecology of our planet to have to let such an outpouring of crude oil into the oceans.” (EPA-HQ-OAR-2009-0923-2684-1)

Comment:

“Recent events with BP's catastrophic oil spill show us that we cannot trust oil companies to do the right thing for our citizens. Profit is a stronger motivator for some. I believe that the EPA should have more data to obtain a more complete understanding of all the emissions. I was a process chemist for a major chemical company for 32 years and we took EPA regulations seriously and complied. It was good for our safety on the job, our workers' health and the environment. Please help current companies, especially the oil and gas companies, to do the same.” (EPA-HQ-OAR-2009-0923-2685-1)

Comment:

“The Deep water Horizon Blowout in the Gulf of Mexico has shown just how willing and eager the oil and gas industry is to under report its pollution when it even bothers to report pollution at all. Gallons or barrels released per minute doesn't even begin to start to account for the air pollution and carbon load additions from direction natural gas releases that bubble into the air or for gas hydrates for long term release into the ocean or air and yet have grossly under reported the direct water pollution and BP in its response plan submitted to MMS had no plans but identified the problems that would be created, which showed bad faith in my opinion. How can anything that identifies no real timely response but only problems be substituted for a response plan?

As an oil major, BP has shown the oil industry is not worthy of the trust it had been given. It needs to be held to closer account, as your proposed rule begins to do.. ” (EPA-HQ-OAR-2009-0923-2686-1)

Comment:

“How many more catastrophes such as the Gulf spill will have to happen before you in Washington do something about curtailing the oil industry? ACT – NOW” (EPA-HQ-OAR-2009-0923-2687-1)

Comment:

“All emission sources must be reported in order to evaluate effects and required actions in a timely and accurate manner. The oil and gas industries are major contributors and must be held to account for all their sources.” (EPA-HQ-OAR-2009-0923-2688-1)

Comment:

“I also think that allowing deep offshore drilling is totally irresponsible. There is no such thing as safe drilling. It should be banned.” (EPA-HQ-OAR-2009-0923-2689-1)

Comment:

“ALSO, I think this oil rig disaster should serve as a reminder that oil and gas IS NOT clean. Please help to support clean energy, such as wind and solar power, so that these disasters can be avoided in the future and so that we can begin to curb the most eminent disaster--global climate change” (EPA-HQ-OAR-2009-0923-2690-1)

Comment:

“Aside from the terrible price we will pay for the destruction of marine and coastal habitat in the Gulf, the jobs and livelihood of fishermen, coastal residents, and the tourism trade in Louisiana and the gulfcoast, consider our young men and women who have or will die in the wars in Iraq, Afghanistan, Pakistan & the middle east arising out of our petroleum dependence. The price is too high, and the reason we as Americans are paying is that BP and the other petroleum companies are not paying the true natural, health and economic costs of exploiting fossil fuel reserves. NOW is the time to compel them to start realizing and paying those costs.” (EPA-HQ-OAR-2009-0923-2691-1)

Comment:

“ALL OIL AND GAS EMISSIONS NEED TO BE INCLUDED IN THE REPORTING SYSTEM BECAUSE THEY EXIST AND CONTRIBUTE STRONGLY TO GLOBAL WARMING AND POLLUTION!!!!!!” (EPA-HQ-OAR-2009-0923-2692-1)

Comment:

“Ultimately, the best way to reduce greenhouse gas emissions is the promotion of the development, use and reliance upon alternate, sustainable, clean sources of energy, wind and solar foremost, through appropriate legislation and incentive programs.” (EPA-HQ-OAR-2009-0923-2693-1)

Comment:

“The oil and gas companies must be held accountable for their actions. They know how to drill for oil and gas, but apparently they do not have the necessary procedures in place to deal with any types of emergencies.” (EPA-HQ-OAR-2009-0923-2694-1)

Comment:

“This entire hemorrhage is an outrage on every level. The interests of the environment and the American public must become the priority -not the interests of Big Oil and Big Money!” (EPA-HQ-OAR-2009-0923-2696-1)

Comment:

“Do the right thing...it's our health we are talking about! What is more important than that?” (EPA-HQ-OAR-2009-0923-2697-1)

Comment:

“The oil blowout in the Gulf of Mexico is just one more reason that we must get away from burning fossil fuels. The biggest reason, of course, is global climate disruption.” (EPA-HQ-OAR-2009-0923-2699-1)

Comment:

“The BP Deepwater Horizon oil-rig disaster is a sad and stark reminder that oil is a dirty, dangerous, and deadly energy source that has no place in a 21st-century energy economy. I urge you to engage every resource available to address the immediate cleanup and recovery needs of Gulf Coast residents, businesses, wildlife, and marine life. I've had enough - we need a commitment to end all new proposals for offshore oil drilling and permanently protect our coasts. Instead of risking our lives, our coasts, our clean air, and our security by perpetuating our addiction to oil, it's time to build a clean-energy economy that means more jobs, less pollution, and real energy independence. Do everything you can to put voltaic solar panels on every roof in the US. This is enough energy for now and the future, including the supply for electric cars for everyone and all manufacturing plants. You can close down the heat creating power plants, eliminate the need for water cooling, reduce dangerous coal mining and substantially reduce global warming by reducing CO² emissions.” (EPA-HQ-OAR-2009-0923-2700-1)

Comment:

“Please, make sure government is doing the job we taxpayers are paying for--enforcing the law--equally and fairly--and protecting the public.” (EPA-HQ-OAR-2009-0923-2701-1)

Comment:

“Loopholes and subsidies seem to continue to keep us dependent on a fossil-fuel based economy. Let the oil, gas, and coal industries pay what they rightfully should instead of the US taxpayer footing some of the bill, we can pay what we should at the pump and electrical outlet. It took Exxon/Mobil over 20 years to pay what it was order to pay.” (EPA-HQ-OAR-2009-0923-2703-1)

Comment:

“Gasoline is exponentially higher in Europe because their industry is not subsidized, and their citizenry seem more agreeable to efforts to reduce pollution partly as a result. They are paying a fair price and so the market forces help them find alternatives. We in the US have unjustly kept oil, gas, and coal (to a lesser degree) shielded from the market forces that would allow for alternative energy sources to gain a foothold.” (EPA-HQ-OAR-2009-0923-2703-2)

Comment:

“I often think where the US might be in relation to energy had Al Gore won in 2000 instead of George Bush. He did not, however, and so we are even farther behind in the curve for reducing our consumption of oil, gas, and coal and I hope you will get us moving down the pathway to correct that long trajectory of pollution.” (EPA-HQ-OAR-2009-0923-2703-3)

Comment:

“I AM TIRED OF SEEING ANIMALS COVERED IN OIL AND DYING A SLOW AGONIZING DEATH !” (EPA-HQ-OAR-2009-0923-2704-1)

Comment:

“It's time to do the right thing, for our planet and our children.” (EPA-HQ-OAR-2009-0923-2706-1)

Comment:

“If we are to remain a viable democracy, we must eliminate money and influence to the fullest extent possible from controlling policy decisions. The oil and gas production industry is no different than the mafia, controlling our government with bribes and intimidation. Will you have the courage and fortitude to hold the industry accountable for its actions? I fervently hope so.” (EPA-HQ-OAR-2009-0923-2707-1)

Comment:

“We need to stop destroying the earth. As a Native American proverb states "Treat the earth well, it was not given to you by your parents, it was loaned to you by your children."” (EPA-HQ-OAR-2009-0923-2708-1)

Comment:

“It is especially important to the future of coral reefs that we reduce greenhouse gases and wean ourselves off fossil fuels in particular.” (EPA-HQ-OAR-2009-0923-2709-1)

Comment:

“We must take necessary action to protect our environment, its wildlife, and our fragile ecosystem. We cannot allow this industry to continue to walk all over us and destroy our wildlife and our planet as they are currently doing!” (EPA-HQ-OAR-2009-0923-2710-1)

Comment:

“This is a huge travesty. The oil spill is against nature. Sea creatures and human lives have been destroyed, as well as, jobs, the environment and our incredible resource along 3/4 of our country...the gulf and oceans. The pollution is not isolated and will move it's way through the Atlantic oceanic waterways. BP is at fault. There is no denying it. They were greedy and still are. Check out their ads. They cannot green wash this one. We should not be adding any more offshore drilling. This is a lesson that we should pay close attention to. The American people are angry will BP. When we are told this is unAmerican we must remember that this is NOT even an American company. However, we should not allow ANY enterprise or business to destroy our precious environment and eco-systems - whether US or elsewhere -EVER! We must save and salvage whatever is left of our environment - not allow others to destroy it!” (EPA-HQ-OAR-2009-0923-2711-1)

Comment:

“Here in Southern California, I have passed refineries and noted exhaust pipes spewing smoke and fire. Also, on some occasions, I recall smelling whatever is being emitted by those refineries. I can only imagine the fate of those living nearby.” (EPA-HQ-OAR-2009-0923-2712-1)

Comment:

“THIS IS THE TYPE OF INFORMATION THAT ENGAGES MORE OF AMERICA'S CITIZENRY AND MAKES OUR DEMOCRACY STRONGER. PLEASE HELP STOP THE DISTORTIONS, THE COVER-UPS AND OUTRIGHT LIES!!!” (EPA-HQ-OAR-2009-0923-2714-1)

Comment:

“If we can not learn some lessons from this horrific disaster in the gulf, then we have already started down a slippery slope towards poisoning our planet.” (EPA-HQ-OAR-2009-0923-2715-1)

Comment:

“Moreover, the EPA should require more strict guidelines be established & routinely tested for emergency situations.” (EPA-HQ-OAR-2009-0923-2717-1)

Comment:

“Loopholes... have nothing to do with doing what is right and responsible. We have only one planet - let the businesses fail who do not show the care and responsibility needed to sustain life on planet earth for all.” (EPA-HQ-OAR-2009-0923-2718-1)

Comment:

“A second learning has to be that the industry and government were woefully unprepared for this catastrophe. Hopefully, no more wells will be drilled until 100% effective measures are in place to prevent this ever happening again. Finally, we must investigate and determine the exact cause of this horror and determine exactly who was responsible, then punish those individuals and groups responsible. It is wrong at this point to assume this was an accident. It must be ascertained whether there was intent to gain political points by making the administration look bad.” (EPA-HQ-OAR-2009-0923-2719-1)

Comment:

“Let this loophole be corrected to become a collar to keep the big dog within limits and unable to just run around ungoverned. THANK YOU FOR PERFORMING YOUR DUTY AS AN ENVIRONMENTAL PROTECTION AGENCY.” (EPA-HQ-OAR-2009-0923-2721-1)

Comment:

“What more has to happen to our country before we wake up and have irreparable damage. I believe we already have it. Please hold the companies accountable.” (EPA-HQ-OAR-2009-0923-2722-1)

Comment:

“I am sick and tired of watching the petrochemical industry have free access to public lands and seas and despoiling them at the cost of taxpayers. Superfund cleanups, toxification of our lands and restricted public access are just some of the inequitable practices to which extraction industry advocates have tethered our energy policy. If we wanted more corrupt government-oil industry policies, we would all be hollering for Dick Cheney to head the MMS. To grant more leases for offshore and onshore oil drilling only benefits a limited segment of our nation; it sure as hell isn't going to alleviate our dependence on oil by drilling in North American waters. It does keep oil executives rich along with the politicians that accept lobbyist dollars to secure their offices. As for drilling the sea floor at the astronomical pressures in deepwater exploration, I wouldn't even trust Bob Ballard and his expertise to work on the sea floor at those depths. It's patently absurd and equally as arrogant to believe we have adequate technology to circumvent disasters; we have more expertise getting to the moon so tell those jerks from BP, Shell, Exxon Mobile and the rest,

to go drill on the damn moon and leave what remains of an intact biosphere to those of us who rely on it more than oil and money.” (EPA-HQ-OAR-2009-0923-2723-1)

Comment:

“The thing is, the Deepwater Horizon was drilling Way Far deeper then BP had ever drilled before and they knew there could be "problems". That's why they paid off DoI/MMI during the previous Administration (the Bushes are good oil men). Why Obama didn't realize it until now and replace those people is beyond me. But he's probably up-to-his-ears with putting out NSA-type Fires that leave not enough hours in the day to deal with the ubiquitous graft of previous administrations. BP/Exxon/Shell /Texaco, et al should have to pay to clean up their Messes, YES Obviously. But they should pay MORE thenJ UST Clean-Up costs from their oil spills and gas leaks. They should pay Punitive Damages AND pay the People whose lives have been affected by oil spills and gas leaks Compensatory Damages. If a Fisher person or a Restaurant Owner was squirreling away \$\$\$ to pay their kids' college education or their retirement, They Should Have To Pay THAT Too! Because they'll Never get the Gulf back. If clean-up and exposure to toxic dispersants caused illness or death of someone, they should Not Only Pay for State-of-the-Art, Comprehensive Medical AND Related Services, they should also Pay for the SUM-TOTAL of what that person/family has suffered because of On-going NEGLIGENCE-GREED. They should pay Punitive Damages to the United States, the States of Alaska, California, Louisiana and wherever else there has been a leak or spill, also to each Parrish, each Fish & Game, both local and National, and Natural Resources Board for each and every non-human life drowned in oil and ecosystem ruined, and to each and every Individual who has ever been effected by their oil spill and gas leaks. And THAT'S only a Start: How about charging Shell for what it cost our Coast Guard to map the floor of the Artic Ocean for them 3 years ago? They gott hat Courtesy of the USCG: How much do you think THAT Costs? Just likeBig Pharm getting all these drug trials courtesy of the FDA who is supposed to be monitoring them. And don't even get me started on Ecuador and Nigeria. Just think of all the Clean Energy jobs we can reap from their evil havoc...” (EPA-HQ-OAR-2009-0923-2724-1)

Comment:

“TOO many years have passed to count the vast number of constant AIR and WATER VIOLATIONS, that continually are ignored in Wyoming . This includes the EPA and the Wyoming Department of Quality, which are the only agencies that could have addressed these problems. The only remediation is an occasional major spill on the highway, river, or something too obvious, that it can't be avoided. Because Wyoming receives so much of its state funding from energy, it has done little to curb escalating pollution rates, or truly followed up on the Oil and Gas "fracking process", that poisons our water tables.

I have expressed concerns about air quality violations several times, and even provided

photographs of toxic plumes,... most recently a mile long emission hung that over this cold valley during our Thanksgiving period.

State Agencies have not provided an air monitor for this area Riverton area of Fremont county since I first notified the state environment agency in the 1970's. They seem a "little too reluctant" to even borrow one from another area. This of course makes individuals think that there is something to hide!

I have even talked to the Doctors in this area. There is far too high of an incidence of Asthma, and lung related problems. I have called and sent information and concerns to the DEQ in past months, and even letters, spanning many years, about the same recurring air quality problems. In each case, the concern has been about the difficulty in breathing due to the toxic fumes, constantly released, especially at night, in the Riverton, Wyoming areas. Oil and Gas apparently put little effort to put in even minimal safeguards for citizens. Schools even have emergency plans in case one of the area plants has an explosion, but it will provide the residents with little safety, when the deadly toxic clouds blow in over the town when we are all sleeping!

This problem is likely a microcosm on a national scale. As we watch the Oil and Gas profits RISE tremendously on a yearly national scale, one has to wonder why there is little incentive, and certainly NO REAL PUNITIVE enforcement for all the many violations across this nation.” (EPA-HQ-OAR-2009-0923-2725-1)

Comment:

“The environment - our world - cannot afford more antics like this. Hold them accountable - quit playing politics with the future and do the right thing.” (EPA-HQ-OAR-2009-0923-2726-1)

Comment:

“It is abundantly clear that the oil and gas industry, like other rich corporations, are only concerned about profits "for their shareholders." Of course, their own salaries and bonuses are obscenely inflated. Public good is not their concern; only profits for themselves.” (EPA-HQ-OAR-2009-0923-2728-1)

Comment:

“No one can manage what they do not measure. Our nation, whether in the form of public policy decisions made by the Congress or regulatory actions taken by EPA or other Federal or State regulators, can not manage or even make rational decisions concerning green house gas emissions if all of those emissions are not measured. The oil and gas industry are major emitters of green house gas pollution.” (EPA-HQ-OAR-2009-0923-2729-1)

Comment:

“I am appalled by the false statements being made daily by BP executives - do they think we are all too stupid to see what's right before our eyes. All of them should go to prison - after they pay in dollars for what their neglect has caused.” (EPA-HQ-OAR-2009-0923-2730-1)

Comment:

“Did I miss something? I always thought that my children, my grandchildren and I had the right to breath clean air, drink unpolluted water and live in a clean world. I guess the rights of the big polluters with the deep pockets of the some of the worst polluters of business and industry trump mine. If the runoff from a cattle feed lot pollutes a nearby stream, that owner is fined and ordered to clean up the mess. The big air pollution emitters are not even required to disclose their pollution! What a double standard.” (EPA-HQ-OAR-2009-0923-2731-1)

Comment:

“I support any legislation, etc. that will help this planet be preserved for future generations. I would like those in power, to look at the bigpicture, not the now picture (this is bad enough) and clean up our planet, use its resourses wisely. Take the almighty GREED out of the pictures and think of our living earth, preserve it!!!

Yes, we should know what is going on with those in power. They are putthere with a sacred trust to do right for our earth.” (EPA-HQ-OAR-2009-0923-2732-1)

Comment:

“I was shocked at the indefensible lack of safety mechanisms and disaster recovery knowledge displayed by BP. They, and NOT ONE TAXPAYER, must pay ALL the costs for this truly irreparable disaster.” (EPA-HQ-OAR-2009-0923-2734-1)

Comment:

“I also urge you to END offshore drilling! Apparently no one knows how to do it in an environmentally responsible way! The southern coast will NEVER be the same!” (EPA-HQ-OAR-2009-0923-2734-2)

Comment:

“The EPA was given the duty to protect the people from those who pollute our environment. Let them do their job.” (EPA-HQ-OAR-2009-0923-2735-1)

Comment:

“I urge you to stop issuing more permits for oil drilling in the ocean NOW. Your administration will be voted out if you dont get this situation under control and liquidate BP for its deliberate malfeasance in this disaster. The President is responsible as he said, he is not responding adequately and must stop bowing to Big Oil.” (EPA-HQ-OAR-2009-0923-2736-1)

Comment:

“I believe the most recent experience in the Gulf of Mexico highlights the need for total accountability of all aspects of oil production lest history repeat itself in a similar although maybe smaller situation with the industry making a unilateral decision not to report their emissions in the process, we cannot afford for corporations to make such decisions because they will opt to minimize any environmental impact for which they are responsible.” (EPA-HQ-OAR-2009-0923-2739-1)

Comment:

“I am also concerned of any further off shore drilling being approved and continued at this point as I watch the destruction of the Gulf of Mexico. We need green energy, wind, solar and other sources to get off the dependency of polluting, dangerous fossil fuels.” (EPA-HQ-OAR-2009-0923-2740-1)

Comment:

“And please counts us among the little folks who are steaming mad that big oil gets away with stuff like this. The Obama Administration, which we supported with votes, energy and money, must do better!” (EPA-HQ-OAR-2009-0923-2742-1)

Comment:

“This is particularly important here in Corpus Christi where the Las Brisas Energy Center wants to build a toxic waste incinerator and the Texas Commission on Environmental Quality is considering an air permit for this polluter.” (EPA-HQ-OAR-2009-0923-2743-1)

Comment:

“I have also read suggestions that more environmental exemptions have been granted, even as this disaster unfolds. That makes no sense at all, in light of the fact that BP seems clueless about how to stop the leak. Why should we believe that any other oil companies have any such expertise? If they did, wouldn't we recruit them to fix BP's mess?” (EPA-HQ-OAR-2009-0923-2744-1)

Comment:

“With this Big Oil Armageddon in the Gulf, the oil, gas and nuclear industries must account for everything they do...the Gulf disaster has shown the world that transparency, responsibility and accountability are absolutely essential.” (EPA-HQ-OAR-2009-0923-2747-1)

Comment:

“PLEASE do something now. We really need some sane regulations on these companies before any more damage is done. Correct the mistakes made by previous administrations and realize that without regulations by the government these companies will never do the right thing for people.” (EPA-HQ-OAR-2009-0923-2748-1)

Comment:

“It's time to make the oil and gas industry take responsibility for their measuring pollution and emissions now!” (EPA-HQ-OAR-2009-0923-2749-1)

Comment:

“What kind of world are we leaving our children?” (EPA-HQ-OAR-2009-0923-2750-1)

Comment:

“Since 1998 I have been working with Grassroots Coalition of Los Angeles (GrassrootsCoalition.org) as the Outreach Coordinator under the direction of Patricia McPherson, our President. What is happening in the Gulf of Mexico is no surprise to us. No accountability and no measurement of toxic air emissions from oil and gas exploration and production operations in the metropolitan Los Angeles area is something people down wind of any oil field live with day in day out. Residents' health and the health of their pets who live outdoors we believe is clearly compromised.

Two loopholes exist in the Clean Air Act under the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) that allow releases of hazardous air pollutants from these oil recovery activities into the environment. Grassroots Coalition, and I as an individual, support closing these

loopholes, given the available technology and apparent health impacts of these pollutants. We would very much appreciate an opportunity to discuss these issues with you and present draft legislation.

The NESHAPs control toxic pollutants known to be hazardous to human health, with impacts ranging from short-term illness to cancer or death. In addition to our concern about the two loopholes mentioned above, we are concerned that hydrogen sulfide was removed from the list of hazardous air pollutants limited by NESHAPs. Oil and gas production is now present in 33 states, so this is truly a national issue as well as an issue of great importance for the Los Angeles area.

The U.S. Environmental Protection Agency has identified dozens of emissions controls for this industry that are readily available "off-the-shelf" and can sometimes even increase profits for oil and gas field operators. The NESHAPs program should reflect these available technologies.

Impacts from these harmful pollutants are felt strongly in Southern California, especially in the L.A. and Ventura Basins, where significant oil and gas exploration and production still occurs in both rich and poor areas. Air pollutants affect local communities as well as the entire region, where we have intractable air quality problems despite significant regulatory efforts. We believe study of health issues and additional measures to reduce air pollution are necessary to protect human health and are critical for meeting other federal Clean Air Act goals." (EPA-HQ-OAR-2009-0923-2751-2)

Comment:

"BP and the oil spill is hurting our one and only planet. We need to fix this problem before the oil continues to spread and pollute the ocean. If we don't do something about it soon, it will take over the entire ocean and it will be too late. All marine life is at risk here, thus endangering the livelihoods of millions. This could lead to worldwide famine within a year or two, thus spreading disease and threatening all of humankind. We need to stop this horrible chain before it continues. The government should declare this an emergency and call upon thousands of engineers and scientists to all work on fixing this problem and stopping the oil spill. BP needs to be held 100 percent accountable for their mistake that is causing pain to our beautiful planet and its inhabitants. They deserve to go bankrupt after all that has happened, and all the money that they currently have should go to fixing this issue. If we don't stop it now, it will impact the way we live forever." (EPA-HQ-OAR-2009-0923-2755-1)

Comment:

"What will it take in addition to the current disaster to make the oil industry accountable for its accidents? The industry spokes-cartel is happy enough to bombard us with the benefits of oil

consumption, but cannot accept responsibility for the world-class disasters that it creates? PLEASE take the necessary actions to make reporting accurate and hold the industry responsible.” (EPA-HQ-OAR-2009-0923-2756-1)

Comment:

“Gee, just what is your job, anyway? Does the name ENVIRONMENTAL PROTECTIVE AGENCY give you a hint?” (EPA-HQ-OAR-2009-0923-2757-1)

Comment:

“Oil and gas spills are an international issues and are international crimes. Oil and Gas companies should be held accountable and pay for all their impacts.” (EPA-HQ-OAR-2009-0923-2759-1)

Comment:

“Oil and gas industry has taken advantage of a system that has catered to their interests for entirely too long. Government employees giving "free passes" to oil and gas and certainly paid off well--the entire Gulf coast in peril because of greed! It has to end. Man cannot regulate himself--BP and the MMS office have demonstrated this principal, so the EPA needs to make everyone accountable.” (EPA-HQ-OAR-2009-0923-2760-1)

Comment:

“I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-2761-1)

Comment:

“Please, for the sake of our children, we must make sure corporations are responsible for their pollution. We need to know the harm being caused. We need to make sure they do what is right for our nation.” (EPA-HQ-OAR-2009-0923-2762-1)

Comment:

“Transparency and accountability is A MUST in this regard, as pollution affects us ALL.” (EPA-HQ-OAR-2009-0923-2763-1)

Comment:

“Please close the loopholes that allow the oil and gas industry to circumvent the law. Our environment is fragile and precious. It is the only environment that we have.” (EPA-HQ-OAR-2009-0923-2764-1)

Comment:

“We're counting on you to "do the right thing" and help disconnect us from the dark shadow of corporate secrecy and greed that infect all our lives ultimately--you and your family, too!!!” (EPA-HQ-OAR-2009-0923-2766-1)

Comment:

“The Oil and Gas Industry must be held accountable. All the money that has been 'wasted' on the Gulf accident could have been spent on renewable energy. Pollution of our oceans must stop. Off shore drilling must stop.” (EPA-HQ-OAR-2009-0923-2768-1)

Comment:

“Please listen to the vast majority of the citizens of the USA and make big oil pay to help all those hurt by this terrible accident.” (EPA-HQ-OAR-2009-0923-2768-2)

Comment:

“There is no excuse for what is happening in the Gulf of Mexico. Prior to getting any kind of permit BP should have had remedies in place, ready at a moments notice to stop any situation. Here we are almost 2 months post explosion with no cure in sight. NOT ACCEPTABLE.” (EPA-HQ-OAR-2009-0923-2769-1)

Comment:

“I urge you to consider nothing less than hold the Oil and Gas industry accountable and make necessary a track record of their emissions that damage our environment increasing global warming. It is shameful to think of what our government allows these companies to get away with.” (EPA-HQ-OAR-2009-0923-2771-1)

Comment:

“What are YOU (EPA) doing about this oil spill. This has global ramifications. Bring in the Clowns, or are they already in charge???” (EPA-HQ-OAR-2009-0923-2772-1)

Comment:

“Today, as we've discussed in class, energy and natural resources are very much on our minds; the responsibility to act has never been greater. The greatest man-made disaster is unfolding in the gulf, an oil spill that threatens to surpass that of the Valdez, the 11 million gallon spill in 1989, the effects of which linger along the shores of Alaska. The climate crisis, substantiated by hundreds of the world's leading climatologists, continues and CO2 levels climb at their fastest to over 390 ppm. Members of The United Nation's Intergovernmental Panel on Climate Change, including our own Dr. John Byrne (University of Delaware's Nobel Prize winner), tell us that we have less than 10 years to avert disastrous climatic change, less than 10 years to act. To supply 50% of our electricity needs, we destroy 500 million year old mountains and diminish natural and human communities and waterways (please go to www.ilovemountains.com for a better sense of the tragedy); we wonder how a civilized culture could enable such destruction of its natural capital, that which supplies fresh air, soil, and water so necessary for life. Several years ago, 1000 of the world's leading scientists reported that ...over the past 50 years, humans have changed ecosystems more rapidly and extensively than in any comparable period of time in human history, largely to meet the growing demands for food, fresh water, timber, fiber, and fuel; this has resulted in a substantial and largely irreversible loss in the diversity of life on Earth” ((Millennium Ecosystem Assessment Synthesis Report 2005).

In the past couple of weeks, some of our most thoughtful (e.g. David Brooks, Paul Krugman, Thomas Friedman, Bill McKibben, James Hansen, Stephen Chu, John Holdren, Bill Gates) write that we must follow a new paradigm, we must move from that which threatens our security, our environment, and our lives to that which is renewable, that which works with nature, that which is sustainable.

We write you while remembering our mission to lead others in sustainable living, to lessen our burden on the natural world and its resources, and to plan for our children and theirs. We're reminded that a sustainable society works with nature by relying on the sun, protecting biodiversity, recycling, and by regulating human populations and their demands.” (EPA-HQ-OAR-2009-0923-2774-1)

Comment:

“Even as we watch the daily murder of the Gulf of Mexico and the human and wildlife that are intricately tied to that body of water, more exploration is taking place in dangerous coastal waters, without ANY oversight or ANY regulation. This has to stop TODAY. I hear all the talking heads and PR stooges blather about how it's all so safe, and know that as I watch the "live feed" from the under sea gusher, there is no scale attached to the image, so no true way to measure the escaping oil. The citizens of the United States are being lied to every minute. And no one, not one single person connected with the three companies involved in this brutal attack on my

country, is being held responsible. At the very least, ALL off shore exploration must be hated immediately, regardless of the financial losses. And ALL regulations of existing wells MUST be enforced. NOW. Before another disaster, no matter how large or small, occurs. The "status quo" has now murdered another 11 human beings and will continue to murder until my government steps up to stop them. BP, Exxon, Chevron, Shell and every other oil company must begin ethical and responsible behavior starting TODAY.” (EPA-HQ-OAR-2009-0923-2775-1)

Comment:

“In order to conduct business, most companies have to have standards, regulations, and accountability for how they handle their business. The oil industry has us "over a barrel" and they know it, for, unfortunately, some time to come. But, their days are numbered, and they know that, too. It is time they followed the same rules as any other business. Their mistakes don't involve one household or one community. Their mistakes affect millions of humans and animals, and ultimately, our entire world.” (EPA-HQ-OAR-2009-0923-2777-1)

Comment:

“We must hold the oil and gas industry accountable. We are seeing daily reports and videos of the tragic damages caused when it is not held accountable. It is our air, water and land that they are polluting with tragic consequences for all--people plants, animals, jobs, health, our children's future. We must know how much pollution and where and in what form before we can rein it in. Last year, the industry successfully fought the mandatory reporting of greenhouse gases.” (EPA-HQ-OAR-2009-0923-2779-1)

Comment:

“Please note, refusal to respond sincerely, effectively, and totally to my letter, which constitutes an act of participatory democracy, is considered by me a termination of the social contract between myself and the United States Government.” (EPA-HQ-OAR-2009-0923-2780-1)

Comment:

“As this disaster so starkly points out, they should also be held to much higher standards when it comes to drilling oil wells, especially in such inaccessible locations. Obviously they were not properly prepared to deal with a blown out well such as we are experiencing in the Gulf of Mexico.” (EPA-HQ-OAR-2009-0923-2781-1)

Comment:

“I appreciate your sincere consideration of my comments. I expect to learn that you have included the entire oil and gas industry in the mandatory greenhouse gas reporting rule. We did not inherit this Earth from our parents, we are borrowing it from our children!” (EPA-HQ-OAR-2009-0923-2782-1)

Comment:

“Just because you are running BP does NOT mean you know how to solve the problems of BP (the same goes for running the country). In my opinion the leaders of BP are incompetent buffoons, which they have proved from day one. Stop bowing down to their so-called expertise while the oceans, and ultimately the humans, are dying. Many people have patented ideas to help this disaster, let's use some of OUR money to try these instead of waiting months for BP's next step. WE NEED TO DO SOMETHING NOW!!! The time to hesitate and worry about stepping on someone's feelings is waaaaay over. I'm am becoming more and more ashamed of the so-called "leaders" we have in the USA whether in politics or the private sector. This is a disaster people, and when the weather emergencies come, and they will come, we will be too late. What is the REASON for the stalling going on???? Whatever it is, it is NOT good enough. Did you hear me??? It is NOT good enough. DO SOMETHING NOW NOT IN THE NEXT FEW MONTHS!!!!!!” (EPA-HQ-OAR-2009-0923-2783-1)

Comment:

“I am thoroughly disappointed that this administration did not step up sooner, I am former military and I KNOW we had the resources and technology to stop this months ago. This is an outrage and now BP has destroyed a large amount of our coastline, plants, and animals. Something needs to be done NOW” (EPA-HQ-OAR-2009-0923-2784-1)

Comment:

“I am outraged that BP has been so sloppy in their drilling discipline. The upper management has obviously been incentivised to stay on budget and on a timeline that was not compatible with the safest way of proceeding--reported so clearly by the Wall Street Journal. The Oil Industry obviously cannot be trusted to hold safety first and foremost in their drilling operations.” (EPA-HQ-OAR-2009-0923-2786-1)

Comment:

“I am heartsick about all that has been and is being destroyed by the BP oil disaster. The loss of marine life, habitat and the destruction of away of life and livelihood seems unbearable at times.” (EPA-HQ-OAR-2009-0923-2787-1)

Comment:

“Please do not move backward in this age of oil scum that is only very slowly beginning to raise it's ugly head in the Gulf of Mexico. The people want their government to protect them not join with the polluters or look the other way when it's politically expedient. America honors leaders not politicians!” (EPA-HQ-OAR-2009-0923-2788-1)

Comment:

“The MMS regulators and investigators have apparently been bribed to look the other way with everything from vacation cruises to sex. I hope the EPA is squeaky clean in this regard. In any case, it is time for all regulatory agencies to get tough with the oil and gas industry (along with others.)

The future of the planet is at stake.” (EPA-HQ-OAR-2009-0923-2791-1)

Comment:

“This is an absurd situation. Mother Earth is bleeding.....and she will turn herself around to make a new beginning...but many many people will have to leave, in order to create a new planet...its all about to happen.” (EPA-HQ-OAR-2009-0923-2793-1)

Comment:

“I feel some kind of independent organization should investigate emission testing. no more of those who would most benefit being the ones to offer up information.” (EPA-HQ-OAR-2009-0923-2794-1)

Comment:

“As a citizen and mother of a 10 year old child living on the Barnett Shale and surrounded by oil and gas facilities 200 feet from our home, I firmly believe that my family’s health is in jeopardy if the EPA does not intervene in Texas. I have filed numerous complaints with the TCEQ. The process is slow, full of bureaucracy, and perhaps corruption at the upper levels. Benzene levels alone on our property have been documented by the TCEQ as follows:

January 17, 2010 – 59 ppbv February 3, 2010 – 120 ppbv February 27, 2010 – 17 ppbv February 28, 2010 – 7.4 ppbv

The operator’s response to this was to install an enclosed flare 400 feet from our home that billows out smoke, flames, and greenhouse gas 24 hours a day seven days a week. I have

resorted to ordering my own outdoor continuous ambient air monitoring equipment in an effort to safeguard my family and in response to the TCEQ's inability or unwillingness to perform long-term emission testing in our area. Wise County's air quality is horrible and continues to get worse as the drilling increases. The condensate tanks on our property leaked immediately and continue to do so to this day. As citizens complain about odors, the only thing the TCEQ responds to, operators will continue to install greenhouse gas machines (enclosed flares). The odors will go away, but not the greenhouse gases, therefore, the TCEQ will have nothing to respond to because all that matters to them is what we smell. This is a ridiculous solution and threatens the health of our children. The EPA must intervene." (EPA-HQ-OAR-2009-0923-2795-1)

Comment:

"BP's deep water crime is evidence that peak oil is here and that future recovery of oil will come with an increased cost to both our energy budgets as well as the environment. I strongly urge EPA to hold accountable the oil and gas industry with the most rigorous reporting system possible." (EPA-HQ-OAR-2009-0923-2797-1)

Comment:

"Big business has lied to us for too long and sadly our Government has for too long been part and parcel to their cause. There simply can not be anymore loopholes or special compensation for companies that make billions of dollars in profit and continue to foul our earth. We all have to demand more of corporations that we purchase good from - we are there source of wealth. We deserve better. Our earth can not take anymore abuse." (EPA-HQ-OAR-2009-0923-2798-1)

Comment:

"It is time to stop allowing short term expediency drive decisions that are, in the long term, unwise and more costly." (EPA-HQ-OAR-2009-0923-2799-1)

Comment:

"The oil industry enjoys too many tax breaks and has too much power. It is past time for their power to be curtailed in the interest of the environment, the economy and American tax payers." (EPA-HQ-OAR-2009-0923-2800-1)

Comment:

"What would happen if there was no accountability factored in our legislature? If there is accountability in all our actions, why not include the huge corporate fascists who won't yield to

the equation: All people, places, and things must be held accountable for the consequences of their actions?

Please support the EPA.” (EPA-HQ-OAR-2009-0923-2801-1)

Comment:

“The mission of a government agency like the EPA needs to be to protect the citizens of this country.” (EPA-HQ-OAR-2009-0923-2802-1)

Comment:

“There is no reason that the oil and gas industry should be exempt from reporting their emissions. Please hold them accountable.” (EPA-HQ-OAR-2009-0923-2804-1)

Comment:

“We cannot take any big corporation at their word - they have proved time and time again that the only thing their executives hold sacred is their own compensation packages. Regulate, inspect, and impose severe penalties on those who despoil our environment for profit.” (EPA-HQ-OAR-2009-0923-2806-1)

Comment:

“I completely and strongly agree with this so the oil and gas companies are accountable for the pollution and messes that they create.” (EPA-HQ-OAR-2009-0923-2807-1)

Comment:

“All corporations MUST be held accountable for their actions, especially those in the banking and energy sectors.

The EPA must be given FANGS to control ALL corporations contributing to pollution of all kinds. Companies MUST be held accountable for the damages they do to the land, air, water and the people not only of the United States but the rest of the world.

It is ESSENTIAL that the laws follow the corporate wrongdoers because most of the multinationals have a long history of just moving elsewhere when they can't get around local regulations. And if the regulations in such foreign venue don't suit them they just buy out the government or strong-arm the enforcers.

Now BP is trying it in Gulf.

This has GOT TO STOP!

Rigorous supervision and detailed, direct reporting of pollution (air, water, land, noise, bacteriological, etc) for ALL manufacturers and processors MUST be put into place IMMEDIATELY and those who flaunt the law dealt with severely.” (EPA-HQ-OAR-2009-0923-2810-1)

Comment:

“I also urge you to step up accountability and responsibility in the agencies such as the MMI that have acted out of special interest relationships rather than to the best interests of our people and our country!” (EPA-HQ-OAR-2009-0923-2814-1)

Comment:

“Not only should the oil, gas, and coal industry be held accountable for any accidents but the emissions standard should be held to the highest. Not only this, but any new techniques using any type of fossil should never be used until there are plans of what to do if it fails. All means of science, finances, and intellectual should be used to have a time in the very near future when we will no longer use fossil fuels for our energy.” (EPA-HQ-OAR-2009-0923-2815-1)

Comment:

“The grim BP Gulf spill is only the latest installment in the gross pollution history of the petroleum industry. The industry requires stronger regulation.” (EPA-HQ-OAR-2009-0923-2816-1)

Comment:

“Just as we have seen financial institutions run amok when they aren't supervised well enough, now we are seeing how fossil fuel energy companies are running amok. This is not fair to citizens or to the ecosystem. This is a tragedy that will impact generations to come. Please hold the perpetrators accountable. They had no business drilling without developing proper contingency plans.” (EPA-HQ-OAR-2009-0923-2818-1)

Comment:

“The only laws that work on industries need to have strong economic consequences. Otherwise an industry can consider the cost of a fine worth the risk of ignoring the laws. They shouldn't be allowed to drag this out in court. That costs them little since they have lawyers on their staffs. The most effective deterrent would be for the CEO and other top paid positions to have personal financial and/or other consequences for not meeting regulations.” (EPA-HQ-OAR-2009-0923-2819-1)

Comment:

“Watching oil spew out of a hole in the ground for the SIX WEEKS illustrates the recklessness and irresponsibility demonstrated by the oil industry, in addition to its inability to monitor its own operations - OUTRAGEOUS!!!” (EPA-HQ-OAR-2009-0923-2823-1)

Comment:

“I live in Fort Worth, Texas and can not emphasize enough the importance of getting the emissions from drilling and other gas facilities under control. I had the air tested in my backyard using a 24 hour canister test and the Benzene level was above the Long Term Health concern levels. Since I am retired (older person) there are many days at the house location when I never leave. Therefore my exposure would be continuous.

I do fear for my health. Being older, things take longer to get better normally and I do not want to think my health issues and recovery times would be extended unnecessarily or that I am being exposed to chemicals or toxins that could trigger the cancers or other diseases. I do not want to think my health is secondary to the gas drilling profits.” (EPA-HQ-OAR-2009-0923-2825-1)

Comment:

“I think we now realize how massive, influential and corrupt the mega oil industry giants really are. They are culpable of profit at any cost; without regard of anyone or any restrictions related to environmental well being, human health or financial hardship or loss of livelihood. They must be held accountable!” (EPA-HQ-OAR-2009-0923-2828-1)

Comment:

“The oil industry cannot just reap huge profits from the sale of its oil while not putting in place safeguards and actions that account for and monitor the outcome of gas sales and usage on planet Earth. The oil industry has the ethical duty to monitor its gas sales and what effect it is having for the survival of all life.” (EPA-HQ-OAR-2009-0923-2834-1)

Comment:

“We can no longer afford to ignore the pollution output of the oil and gas industry. Without reporting it and applying appropriate regulation and limits on it, we will be working at cross purposes as we take other actions to address global warming. I wholeheartedly support the EPA's proposal to include both onshore and offshore oil & gas operations in monitoring, reporting and regulation.” (EPA-HQ-OAR-2009-0923-2839-1)

Comment:

“All industrial activities must be part of the same monitoring system if any form of responsible control is to be exercised.” (EPA-HQ-OAR-2009-0923-2840-1)

Comment:

“Enough is enough! This is the country of “we the people”, not “we the corporations who do anything to make a profit regardless of what is good for the people”.

I am writing you to implore you to do your part to ensure a livable future for us and our children's children. The lack of accountability for these corporate polluters is unconscionable and criminal.

You can play a critical role in stopping the looting and destruction of resources that are the inheritance of ALL of us.” (EPA-HQ-OAR-2009-0923-2850-1)

Comment:

“WE NEED CLEAR REGULATIONS FOR THE SAFETY OF OUR PEOPLE AND THE ENVIRONMENT. BP IS THE PROOF OF IT. WE MUST ACT NOW.” (EPA-HQ-OAR-2009-0923-2865-1)

Comment:

“I strongly support the return to regulation of the oil and gas industry to undo the Bush Administration attempts to give these polluting industries a free ride.” (EPA-HQ-OAR-2009-0923-2867-1)

Comment:

“I also believe we need full disclosure of all global warming pollution emitted by the oil and gas companies.” (EPA-HQ-OAR-2009-0923-2871-1)

Comment:

“Watching the grim BP disaster unfolding in the Gulf, it's clear to the public of the United States of America that the oil and gas industry must be held accountable!

It is time that this industry to held to standards and inspections already in place at the least.” (EPA-HQ-OAR-2009-0923-2874-1)

Comment:

“On oil and gas they can drill in urban areas using power from the power grid cutting down diesel exhaust which is toxic the drilling can be done with a green completion as well as any and all vapor recovery.” (EPA-HQ-OAR-2009-0923-2877-1)

Comment:

“THE HEALTH PROBLEMS AROUND THE WORLD WOULD BE MUCH IMPROVED IF THESE COMPANIES WERE HELD ACCOUNTABLE FOR THEIR POLLUTION.” (EPA-HQ-OAR-2009-0923-2878-1)

Comment:

“For our own safety and the environments, we need not be dependent on oil, let alone foreign oil. We need to take care of ourselves with our own resources and take good care of our planet.” (EPA-HQ-OAR-2009-0923-2885-1)

Comment:

“We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2891-1)

Comment:

“Our country should be leading the world in dealing with global warming issues. It is in the best interest of this country to get a handle on this urgent problem.” (EPA-HQ-OAR-2009-0923-2894-1)

Comment:

“Please close the loophole that allows oil companies to avoid reporting green house gas emissions. Oil companies should be held accountable for their emissions under very strict reporting standards. I urge you to implement these rules as soon as possible.” (EPA-HQ-OAR-2009-0923-2898-1)

Comment:

“I support the effort to include the oil and gas industry in the mandatory greenhouse gas reporting proposal. They should not be excluded. We need to know the full impact of that industry on our planet, so we can be as fully informed as possible in determining what we can do to address the challenges presented by climate change.” (EPA-HQ-OAR-2009-0923-2900-1)

Comment:

“Contingency plans for drilling in the gulf should not detail how to deal with a walrus - as BP's does. Dealing with mile deep breaks is far more important” (EPA-HQ-OAR-2009-0923-2901-1)

Comment:

“Please fix the loopholes that allow BIG OIL to hide their pollutions. No more exemptions!!! Please hold BIG OIL accountable.” (EPA-HQ-OAR-2009-0923-2902-2)

Comment:

“We must also hold Dick Cheney accountable for reducing our oil and gas industry rules to a rubber stamp without evaluation of safety, environment, and disaster plans. His meeting with big oil must be made public, and he should have to suffer the consequences of his criminal activity which led to this disaster.” (EPA-HQ-OAR-2009-0923-2903-1)

Comment:

“As we watch this disaster unfold, literally, surely now is the time to hold their feet to the fire and bring the Boys of Big Oil into line with the basic requirements of good corporate citizenship. They have operated under the flag of impunity for far too long.” (EPA-HQ-OAR-2009-0923-2904-1)

Comment:

“We cannot withstand another tragic disaster. This oil spill- that BP is not willing to be forthcoming about with actual real numbers- will take years/generations to restore any semblance of

what was destroyed. We shouldn't have to ever suffer this again. Comments by the BP spokesperson telling us "Louisiana isn't the only source of shrimp" is not only offensive but reveals their attitude and regard for the people directly effected and the US in general." (EPA-HQ-OAR-2009-0923-2905-1)

Comment:

“It's about ENVIRONMENTAL PROTECTION for wildlife and homo sapiens” (EPA-HQ-OAR-2009-0923-2906-1)

Comment:

“Big Oil has power and money. Big Oil has clout, a lot of clout. Big Oil has profits on the brain. Big Oil's only thought is money. So the public desperately needs someone who can stand up to Big Oil. Someone who is strong enough and can't be ran over by them You are that someone we need!!!” (EPA-HQ-OAR-2009-0923-2907-1)

Comment:

“I hope that the EPA uses this situation to check on the correctness and accuracy of computer disaster modeling.” (EPA-HQ-OAR-2009-0923-2908-1)

Comment:

“We must hold the oil industry morally and financially responsible for their "accidents" that destroy the environment which belongs to us all! Please do what is necessary to stop this insanity!” (EPA-HQ-OAR-2009-0923-2909-1)

Comment:

“It's time we make oil companies responsible for the total cost of oil spills, including the damage to the environment.” (EPA-HQ-OAR-2009-0923-2910-1)

Comment:

“Carbon and the WASTE associated with oil drilling, pumping, and there fining process are VERY serious threats to LIFE on this planet as we know it. I am 62 years old, my PhD is in entomology and I work everyday on insect conservation. We see in the field every day the effects of our rapidly warming planet and if you care at all about LIFE now isthe time to stop Big Oil and for us, as a species, to we Carbon and the WASTE associated with oil drilling, pumping, and the refining process are VERY serious threats to LIFE on this planet as we know it. I am 62

years old, my PhD is in entomology and I work every day on insect conservation. We see in the field every day the effects of our rapidly warming planet and if you care at all about LIFE, now is the time to stop Big Oil and for us, as a species, to wean ourselves off burning fossil fuels. We know there are other ways to get what we want. GM tested a fleet of electric cars 30 years ago and guess what? Big Oil got the whole effort stopped. They are a powerful group who does not want to give up a single dollar, nor a drop of oil (nor a lump of coal) and the PROFIT it brings and they will do anything including buying senators, to keep the cash rolling in. SOMEONE needs to take the responsibility of saying "NO" to Big Oil. Regardless of how fooled the public is, or how "afraid" we are of NOT running everything on gas we have to stop and the sooner we begin, the more time we'll have to get it right. LET'S START NOW. So, gas may cost more. GOOD, more incentive to CHANGE." (EPA-HQ-OAR-2009-0923-2911-1)

Comment:

"I cannot put into words the feelings I have regarding the current situation in my beloved Gulf of Mexico. The beaches that I have loved and treasured for more than 60 years will soon be unfit to visit. The air near the shore already is heavy with an "aroma" foreign to my nostrils. I wonder how long it will be before I catch the scent at my home some 20 miles inland. Will I be able to live out my retirement years in a home now paid for, or will I be forced to relocate for the sake of my health?

The Gulf coast, it's charm and tourist appeal, the seafood industry and all that it supports are forever damaged. I do not believe we will see this beautiful creation of God return to the pristine white sands of my youth, at least in my lifetime, and perhaps that of my children. A legacy I expected to share with my grandchildren and great grandchildren is forever gone." (EPA-HQ-OAR-2009-0923-2912-1)

Comment:

"When the oil and gas industry is truly accountable for its contributions to global climate change and pollution, only then will our clean energy options have a level playing field to gain their share of the market. It is time to correct this economic disadvantage for clean energy, present a full and honest picture of oil and gas, and move our clean energy agenda forward at last. There is no better time, with the public attention on the false promises of the oil and gas industry, to make this long-overdue correction." (EPA-HQ-OAR-2009-0923-2915-1)

Comment:

"We all should ban BP. Maybe then they would find a faster way to stop the leak. We do not need another disaster as this one. Offshore drilling should be eliminated." (EPA-HQ-OAR-2009-0923-2916-1)

Comment:

“The Gulf will be a virtual dead zone for years, if not decades. The cost to marine life, fish and mammal, is immeasurable; the cost to livelihoods throughout the area, criminal. How will BP ever pay for the aftermath when they're already actively denying the present stating there are no plumes of oil within the ocean?” (EPA-HQ-OAR-2009-0923-2918-1)

Comment:

“We need to take this country back from the corporations. There is no reason that with the huge profits they enjoy, they should put off on taxpayers the costs of their mistakes.” (EPA-HQ-OAR-2009-0923-2919-1)

Comment:

“Are you as angry as I am? We have been lied to again and again about the new "technologies" we have to prevent ANY spill. Instead, we now have environmental devastation. 50% of our entire wetlands are at stake. Fish, mammals, birds have died and will die how do we "mitigate" or "remediate" these deaths and the destruction forever of their homes, air and water? I know it is naive of me, but it is call the ENVIRONMENTAL PROTECTION agency. Not the Big Corporation protection agency. Not the "if it doesn't cost too much environmental protection agency". Not the some day, maybe we'll protect the environment...sort of. ENVIRONMENTAL PROTECTION agency. Although it is far too late to save the environment and the innocent who lived in it, the ecoterrorists (which is truly what they are now proven to be) must be held accountable.” (EPA-HQ-OAR-2009-0923-2920-1)

Comment:

“As a person born in New Orleans sixty-five years ago next Saturday, I am all too familiar with the characteristic irresponsibility of Big Oil, and the havoc they have wreaked and continue to wreak on our entire country. They must be held to account, and forced to behave in a socially responsible manner from hence forth forevermore. No more loopholes to take advantage of, no more special exceptions, no more exemptions, not ever again. Their destruction of the cypress swamps in south Louisiana over the last half-century destroyed the buffer which for over two centuries had protected the Crescent City from Category Five Hurricanes; ergo, they enabled the destruction wreaked by Katrina. And now this.

Please note that they lied when they said that they had fail-safe provisions in place, that the devices had been tested and worked at that depth, and that they could avert any potential disaster. These scoff-laws need to go to prison, so that all the members of Big Oil can be taught by their

example that they cannot poison us all with impunity, and profit by sickening and killing us and our descendants to line their deep pockets with blood money.

Their accomplices in the Congress also need to be brought up short, for they, too, have betrayed us for their windfall profits and their ill-gotten gains. Don't be deterred. Your agency exists to protect us from the ravages of big oil and their ilk. Please do not allow yourselves to be deterred in your sacred mission.” (EPA-HQ-OAR-2009-0923-2921-1)

Comment:

“This kind of non-sence has to be stopped. What ever happened to people being about people instead of about nothing more than the almighty doller, money. In the beginning I was almost willing to say OK this is just an accedent but then I started following things that were going on and on and on... Also I began following the hearings taking place only to become more horrified. How sad to learn that one more time a huge oil company in the interest of their own pockets had begun cutting personel, cutting all sorts of corners in the building of this platform and to add insult to injury knowingly allowed bad/below grad seals to be use on the blow out prevnetor. Lied about all of that and about haveing the know how to fix a problem with equipment at those depthes. In reality there is no more new information about repairs and fixes or how to's for emergencies than there was 30 years ago. Oh sure they know how to get to the oil at those depthes now but that is all they know.Well that and how to fill their pockets and the pockets of their firends and government officials pockets with money. We all have a duty to be stewards of this earth, this planet and to each other and we are not doing a very good job at any of that and haven't been for a really long time now. How, if any company is prepared for any possible anything that could happen not be ready for such a disaster as we have now. It is unforgiveable that it should still be leaking and just this moment said on the news that it may still take upwards of 2 weeks just to get a newsort of cap/dome in place even before they can begin to lower it to even try. Discusting...

What this has done to the enviornment of the Gulf Coast and who knows what else will not be fixed, repaired or restored in our life time. Maybe if they had been telling the truth and have been prepared from the start of their project it could have been. Now - add the fact that hurricain season is approching fast and what do you have? There is just no more words for the incompetance and greed that slowly is starting to show it's self, finaly.

FIX IT! PUT THE RIGHT LAWS AND OVERSITES IN PLACE AND STOP LOOKING AT YOUR PERSONAL GAINS IN THESE SORTS OF THINGS AND DO WHAT IS RIGHT FOR THE PEOPLE, FOR THE WORLD. We only have one. If you/we don't move fast to become the stewards we were ment to be for this incredible planet earth that we have been intrusted with, well...like I said there are just no more words for what is being allowed to happen.” (EPA-HQ-OAR-2009-0923-2922-1)

Comment:

“Additionally, if the limits of liability were not so ridiculously low compared to the cost of a disaster for those affected, large corporations may reconsider the execution of their plans with safer outcomes for everyone.” (EPA-HQ-OAR-2009-0923-2923-1)

Comment:

“I watched with chagrin as the oil and gas industry, using their bought-and-paid-for minions of the Bush Administration, eroded EPA rules and regulations with late Friday executive orders and obvious obfuscation by department personnel. The recent media attention to the shenanigans of those Mining and Minerals bureaucrats, left over into your administration, is a blatant example of how our government has been co-opted by the big boys of oil and gas.” (EPA-HQ-OAR-2009-0923-2924-1)

Comment:

“Please do the job that we entrusted you with and stop playing games with us. You are appointed to defend our interests, even if our interests do not coincide with the interests of the greedy oil companies. Good luck to you and to us.” (EPA-HQ-OAR-2009-0923-2926-1)

Comment:

“Thank you for taking the time to read and consider my important request. I look forward to your next actions on this matter.” (EPA-HQ-OAR-2009-0923-2927-1)

Comment:

“The only way that polluters will ever have to change their policies, is if we know what they're up to. If they aren't doing anything wrong there will be nothing they need to hide.” (EPA-HQ-OAR-2009-0923-2930-1)

Comment:

“And we have certainly seen lately how disastrous it is to let them run their businesses without being watched. They are the big boys with all the money, they are the ones that need the most watching.” (EPA-HQ-OAR-2009-0923-2930-2)

Comment:

“Avoiding the full brunt of climate change and reducing our addiction to fossil fuels are essential to a healthy future.” (EPA-HQ-OAR-2009-0923-2931-1)

Comment:

“Please protect the public's right to know about the pollution being emitted by thousands of facilities in the oil and gas industry. We must start the process of holding these companies accountable for the pollution they are spewing into our environment.” (EPA-HQ-OAR-2009-0923-2932-1)

Comment:

“In light of the current levels of distraction posed by BP in handling the Gulf Oil Spill, the oil and gas industries need to be forced to be fully compliant immediately. Stop delaying!!!!!! I'm fed up with your collusion in allowing them such leeway while they continue to ruin our environment.” (EPA-HQ-OAR-2009-0923-2933-1)

Comment:

“As has become abundantly obvious in the Gulf of Mexico, polluters will lie, cheat, hide, and obscure their greedy and cynical pursuit of profit. It's the People's -- remember us, of by and for the People? -interest, and your job to require them to be at least responsible to the rule of law.” (EPA-HQ-OAR-2009-0923-2935-1)

Comment:

“Ma'am, please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. It's not bad enough they are desecrating the Gulf of Mexico. And it's only a matter of time before something like that happens again, either by man-made error or a hurricane. They ruin the land where they drill for oil and don't find it; that's happened out here in New Mexico amongst other locations. Now they are delaying EPA protection of the very air we breathe. Please do what is right for American citizens' health and well-being. This affects all living beings across the country, plant, animal and human. What is in the atmosphere will eventually find its way on top of and into the ground by rain, then into the water table, then into rivers, lakes, our farms and back to us. Please live up to the "Protection" in your agency's title.” (EPA-HQ-OAR-2009-0923-2936-1)

Comment:

“This is the minimal effort of things we could do. Don't these companies realize that by maintaining our planet's health they are maintaining their own longevity? Help them understand

this by protecting the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. Transparency is good for everyone concerned - especially the industries themselves.” (EPA-HQ-OAR-2009-0923-2938-1)

Comment:

“The oil and gas industry exploits a privilege, that no other industries are allowed, to the enormous detriment of the American public and indeed, the entire world. Their peculiar 'right'-- to ignore current requirements for emission disclosure--jeopardizes our ability to arrest the global warming which is insidiously killing our planet. Please do not allow this to continue uncorrected!” (EPA-HQ-OAR-2009-0923-2939-1)

Comment:

“As my representative in the EPA, show some leadership and determination, earn your check, dont just pick it up.” (EPA-HQ-OAR-2009-0923-2940-1)

Comment:

“Having worked in a community college along the Texas Gulf Coast and seeing (and breathing!) first-hand the games that petrochemical refineries play with emissions, I think it's time for full disclosure.” (EPA-HQ-OAR-2009-0923-2943-1)

Comment:

“We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.This is such a critical issue. The future of our planet home depends on slowing global warming and climate change. What will we leave for the generations to come?” (EPA-HQ-OAR-2009-0923-2944-2)

Comment:

“This year the disasters we faced and continue to face demand that the industry need to be more transparent along with affording one of the best reasons to end our addiction to fossil fuels, It is a perfect time to train the people who work in the industry on to clean energy, The oil and coal industry should not suffer if they make this change and train their employees on 'green' jobs. Their profits would not be affected after the training period, We will still need the employees to manage the new systems.” (EPA-HQ-OAR-2009-0923-2946-1)

Comment:

“My name is Nelson Miller and I live in South West Georgia. I hold very deep concerns for the global environment for many reasons, but most of all because I believe that the world we live in today is a world that we are borrowing from our decedents. It is our duty to deliver it into their hands in the same or better shape than when we got it. Toward that end, we need to take every measure within our power to manage the impact we make on the planet. Making greenhouse gas emitters accountable for there polution is paramount to this goal. Business as usual is not an option. we have to take steps now to ensure a future planet our children can enjoy and prepare for future generations to come. This is the only home we have. We must not take it for granted!” (EPA-HQ-OAR-2009-0923-2947-1)

Comment:

“We will have to get off oil eventually, let's do it sooner than later, or before it's too late.” (EPA-HQ-OAR-2009-0923-2949-1)

Comment:

“This national, no global, tragedy calls for a huge change in the way our US government and corporations interface. I deeply believe we need reform now.” (EPA-HQ-OAR-2009-0923-2951-1)

Comment:

“For too long, Congress and our regulatory agencies have been at the beck and call of big money, willing to sacrifice the greater good for the lure of reelection funds and perks. Let's STOP this cycle here and now and show leadership that will benefit not just our country, but the earth, itself.” (EPA-HQ-OAR-2009-0923-2952-1)

Comment:

“I am writing out of particular concern about what is happening in the Gulf of Mexico oil spill. Huge amounts of chemicals are being released into the sea, people are getting sick -- as well as multitudes of wildlife -- and BP will not release information about what is in these the millions of barrels of chemicals. This is a particularly important time to ask you to please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2953-1)

Comment:

“All Americans must be fully aware of the actions of companies which contribute to climate change. If only the companies' information and not the scientific facts are given to us, we will never be truly informed!” (EPA-HQ-OAR-2009-0923-2954-1)

Comment:

“As citizens of the State of Florida, we have the right to know all about the pollution being emitted by thousands of facilities in the oil and gas industry. Please finalize comprehensive, rigorous requirements for the oil and gas industry to fully disclose the pollution being emitted by the catastrophe in the Gulf and the entire oil and gas industry. We clearly cannot rely on data from the industry.” (EPA-HQ-OAR-2009-0923-2955-1)

Comment:

“There is no justifiable reason for the oil and gas industry to be exempt from providing full disclosure information, least of all for any excuse based on the cost.” (EPA-HQ-OAR-2009-0923-2956-1)

Comment:

“Now is the time for this administration to take action. We can't allow the air we breathe and water we drink (not to mention birds and fish) continue to be polluted by industry. It is time for regulation and accountability.” (EPA-HQ-OAR-2009-0923-2957-1)

Comment:

“And stop holding Obama responsible!” (EPA-HQ-OAR-2009-0923-2958-1)

Comment:

“The BP disaster in the Gulf makes it clear to us that Big Oil/Gas cares not a hoot about our atmosphere, our shorelines, or our waters. We have read that BP makes over 9 Million an Hour. That company surely should pay for every bit of damage it has caused. This includes cleaning up the shoreline, clearing the oil blobs out of the Gulf as much as possible, and providing recompense to the fishermen, farmers, resort owners, and all others who have been hurt by the "Profit over Responsibility" manner in which the business operates.” (EPA-HQ-OAR-2009-0923-2959-1)

Comment:

“What has happened in the Gulf of Mexico is outrageous! We must put controls on off-shore drilling NOW.” (EPA-HQ-OAR-2009-0923-2960-1)

Comment:

“What is happenings in the gulf is an unprecedented disaster. They have been polluting our air for decades and now they are destroying the very livelihood of people living in coastal Louisiana. The watchdogs were not going their job either. The people of Ocqueoc have worked diligently with the Sierra Club to defeat a projected coal plant in our beautiful north woods. We are safe until the next polluter arrives.” (EPA-HQ-OAR-2009-0923-2961-1)

Comment:

“PROPOSAL FOR A NATIONAL SOLAR HOT WATER HEATING PROGRAM PAYS FOR ITSELF AND WILL:

Create hundreds of thousands green jobs. Save homeowner one-third electric bills each month. Save the nation's homeowners \$45 billion each year. Save 500 billion pounds CO2 pollution each year. Offset power consumed by over 30 million homes. Offset 80 coal-fired 1 billion watt power plants

All this can start very quickly through existing technology, no homeowner up-front money and a NATIONAL SOLAR HOT WATER HEATING PROGRAM. And.....The energy is "Free Forever" NATIONAL SOLAR HOT WATER HEATING PROGRAM There are very few times in our lives when something so simple would have such a profound impact. This is one of those times.

A National Solar Hot Water Heating Program will create more jobs, save more money and prevent more pollution than any other solar energy program contemplated to date. This low-tech use of our sun provides the ultimate in distributed energy because the energy gain is spreadover the nation by participation of over 100 million homeowners.

Benefit to United States: Create hundreds of thousands green jobs. Save homeowners \$45 billion each year. Reduce CO2 pollution by 500 billion pounds each year. Mine 544 billion pounds less coal each year. Offset power consumed by 30 million homes. Offset 80 coal-fired power plants.

The program pays for itself and could be implemented like this:

(1)Pass National legislation that would make it worth while for theStates to require homeowners, with few exceptions, to have a solar hot water system. Federal government would provide homeowners with up-front money through a no-interest loan that gets paid back at a rate of aboutone-half energy bill savings.

(2)Once enacted, building codes would require a solar hot water system for new homes and existing homes to convert within 10 years.

(3)Provide education about solar heat systems and the nationalprogramthrough all media.

New home costs would only be \$1k to \$2k higher because the system would be part of the original design and the builder would be operating at the whole sale level. The builder has to install a water heater anyway, so why not solar? The buyer would immediately enjoy one-fourth to one-third less energy bills forever.

Existing homeowners would call a 1-800 number or go online to schedule for their solar system. Contractors submit bids and the homeowner makes a selection. The contractor applies for building permit, completes the work, and calls for inspection. Once inspection passes, the contractor invoices a federal agency for payment. The federal agency pays the cost directly to the contractor for the homeowner. The federal agency then subtracts any incentive money due the homeowner and treats the remainder as a no-interest loan that gets paid off at a rate of about one-half energy bill savings. This would amount to about \$240 per year for an average family until paid off, while they immediately enjoy \$480 per year savings in energy bills forever.

***** Here is why this all works. *****

There is a misconception that solar thermal (heat) panels and solar photovoltaic (electric) panels can be talked about and treated as equals because both use the sun's energy. This leaves a false impression of how these panels really compare.” (EPA-HQ-OAR-2009-0923-2963-1)

Comment:

“Having on two occasions (1990 & 1991) volunteered to clean birds after oil spills, I am well aware of the damages to wildlife, humans and the environment caused by such spills.” (EPA-HQ-OAR-2009-0923-2965-1)

Comment:

“Unlimited profits and limited liability are totally unacceptable to the American people. It's time for long overdue revamping of the entire oil/gas/coal energy corporations without the well-greased palms of Congress and the administration being filled. Get the foxes out of the hen house! There isn't another planet available.” (EPA-HQ-OAR-2009-0923-2966-1)

Comment:

“And don't leave it to them to report it. Hire the staff to do it yourself. Enough of foxes guarding the hens.” (EPA-HQ-OAR-2009-0923-2967-1)

Comment:

“The industry, over a long period of time, has provided us what we have needed in order to grow as a nation. And it has done well! But times are changing and, so, too, our needs. And our attitudes. The industry **MUST NOW BE HELD ACCOUNTABLE** for what it does--or does not do. We the public have a right to know how "all of this" occurs for we all end up "paying the bill" sooner or later. That's not right; that's not fair; that's not "just". It's time to hold the industry accountable. . .with no exceptions. . . given what has, for too long, remained its unregulated operations procedures. **HOLD THE INDUSTRY ACCOUNTABLE FOR ITS WORK!**” (EPA-HQ-OAR-2009-0923-2968-1)

Comment:

“I am continually concerned that in the light of Corporations having concerning behavior, that this is even a question. But, I hope that you will listen to this and work to create greater safety. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-2969-1)

Comment:

“Disclosure has become the watchword for the 21st century. Too long has profiteering under cover been the norm. Full disclosure of the global warming pollution emitted by oil and gas facilities good public policy no matter what direction is taken to reduce emissions. As a long time practicing attorney in the environmental field, it strikes me that some of the proposals for allowing profit to flow from climate change carbon trading is off the mark. Why should people profit from not doing a bad thing? They should instead profit from doing good things and be penalized for doing bad things. Hence regulation makes sense here. There is plenty of money to be made in conventional inventions to meet a need - a need for less emissions which is driven by the fact that ruining the earth should be a crime - just as striking an old lady or stealing from others. On this basis, regulation is clearly the best way to go, but in either case, citizens must have information in order to participate meaningfully in democracy. We must know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry and that right must be protected by you.” (EPA-HQ-OAR-2009-0923-2970-1)

Comment:

“I think all the below is essential, that compromise is essential, but to watch our ocean become disgusting with filthy pollution is a tough price to play for getting along. I firmly believe we have to reach for the next evolutionary step and design new systems. We have to have the vision to take bold steps in problem solving, and to initiate deep changes. And yes, how on earth can the oil industry not be answerable to the mandatory greenhouse gas reporting rule?” (EPA-HQ-OAR-2009-0923-2973-1)

Comment:

“The Gulf Coast will NEVER be the same again. How come Big Oil can just drill away without any means of handling spills???” (EPA-HQ-OAR-2009-0923-2974-1)

Comment:

“The oil and gas industry must be held accountable for the true price of their actions. TIME for People to have more Power than the lobbyists.” (EPA-HQ-OAR-2009-0923-2975-1)

Comment:

“Please oppose any expansion of offshore drilling and limiting oil company liability for spills and nfocus on clean energy instead. They need to pay their own bills. Sen. Murkowski's amendment and other such proposals mean even LESS regulation for companies like BP and Transocean. We're already paying for fat-cat bankers to have bonuses, for polticians to have excellent healthcare policies while the rest of the country is held to adifferent standard, and now the idea of us taxpayers paying for oilcorps' cleanups is CRAZY and immoral. This is not capitalism; it's not free market; it's corporate socialism and corporate welfare. It's cheating, and it's infuriating.

It's time to build a clean-energy economy that means more jobs, less pollution and real energy independence -- thus getting us out of costly WARS. We look forward to your reply and plan of action to not stick us taxpayers again with a corporate bill. BP -- you broke it, you bought it. Sadly, because of this disaster, we are all going to pay with our own lives (the loss of life from animals and our own species).” (EPA-HQ-OAR-2009-0923-2976-1)

Comment:

“Remember this is your Earth, the only one you have -- and it's YOUR and your children's home!” (EPA-HQ-OAR-2009-0923-2978-1)

Comment:

“Now is the time for clear reporting of emissions and the application of science to minimize long term impacts from pollution emissions including the current huge BP disaster in the Gulf!” (EPA-HQ-OAR-2009-0923-2979-1)

Comment:

“Holding Big Oil Companies responsible for their mistakes is the only way they will begin to listen and clean up their act. No more can they expect the average citizen to continually be subjected to oil spills and the devastation they cause. BP should be held accountable for bearing the burden for the clean up of the oil spill in the Gulf, which includes wild life clean up. Maybe it's time to heed the advice that if you make a mess you should have to clean it up.” (EPA-HQ-OAR-2009-0923-2982-1)

Comment:

“Isn't it about time for our governmental protection agencies to actually protect the American people and not big business and their huge campaign funds to set the policy? I am so sick of the republic and regulation of big business and the power it has over our protection agencies. Haven't we had enough??” (EPA-HQ-OAR-2009-0923-2983-1)

Comment:

“I have children and grandchildren. I would like them to grow up in a world where there is a clean and safe environment, with as many species in it as there are now.” (EPA-HQ-OAR-2009-0923-2985-1)

Comment:

“We Americans voted in the Obama Administration because we depended upon and believed in the intent to protect our country and all its wildlands from oil disasters such as the current BP disaster. PLEASE DO NOT LET US DOWN, and do the right thing, by making sure that no loopholes allow big oil companies to continue to hide their HORRIFIC POLLUTION, and are forced to come clean.” (EPA-HQ-OAR-2009-0923-2986-1)

Comment:

“The disaster in the Gulf Coast has hammered home the fact that we cannot assume that energy companies will behave as good citizens regardless of what they pledge.” (EPA-HQ-OAR-2009-0923-2987-1)

Comment:

“Please do not let what is happening in the Gulf happen here in Pennsylvania and New York. The gas drillers have no concern about the environment or the long term, widespread effects of their short-sighted profit schemes. The clean water and natural environment of the Northeast is at stake. I strongly support the efforts of the Sierra Club and others to hold the gas industry

accountable to the HIGHEST standards possible. If not now, when?" (EPA-HQ-OAR-2009-0923-2988-1)

Comment:

"We must regulate and oversee the oil industry. As we are learning to our dismay, they did not spend their profits upgrading their safety and back up plans, they have no idea how to cap this gusher underwater. Someone should go to jail about this -- and laws and inspections and oversight must be strengthened. Until congress, the EPA, and other legal issues surrounding the BP disaster have been concluded, all permits for new drilling in the USA must be placed on hold. During the worst financial crisis in over 50 years, the oil companies have continued to make money - there is something very fishy about that - it should and must be investigated and public hearings should be held." (EPA-HQ-OAR-2009-0923-2989-1)

Comment:

"Since Global Climate change is likely to affect every human on the planet in the next 50 years with those of lesser means bearing the brunt of the effects, I ask that the EPA take an aggressive stance in stemming the rapid increase in global warming gases, especially carbon dioxide emissions." (EPA-HQ-OAR-2009-0923-2991-1)

Comment:

"And, of course, while big polluters need to be required to fully disclose their global warming pollution, the actions of BP should make it obvious that the oil and gas industry won't necessarily always tell the truth. There will also need to be ways to check on whether the information provided by polluters is reasonably accurate, and stiff penalties for falsifying information." (EPA-HQ-OAR-2009-0923-2993-1)

Comment:

"We are all SO UPSET about what is going on in the Gulf of Mexico!!! We want to know about all green house gases and other nasty stuff that is being emitted into our air, is polluting our water, our food supply etc etc." (EPA-HQ-OAR-2009-0923-2994-1)

Comment:

"By the way, thanks to all of the administration for their diligent efforts to control BP and the disaster in the Gulf -- and in particular your attempts to control the disbursements they are using to hide the amount of oil. "We the people" appreciate all efforts to control the mega corporations immoral and dangerous behavior." (EPA-HQ-OAR-2009-0923-2996-1)

Comment:

“There has been discussion of raising the cap on liability to \$10B. I suggest that there should be no cap other than complete liability. BP widely sidestepped or ignored regulations and safety concerns. It is quite possible that a \$10B cap will turn out to possibly be a gift to big oil. Way less than the cost of their malfeasance. If you break it, you own it, even if it bankrupts your corporation.” (EPA-HQ-OAR-2009-0923-2997-1)

Comment:

“Please help STOP these environmental disasters. BP KNEW about the problems & safety issues, but did NOTHING. Didn't want to spend the money. Now look at the disaster! You, the US Gov't had a hand in this mess. You protect big oil companies!” (EPA-HQ-OAR-2009-0923-2998-1)

Comment:

“No more hiding from the facts. No more refusal to understand the dire results of accepting "facts" from corporations who lie outright, distort facts and deliberately mislead. All for greed.

All are held accountable: Government "regulators," Agencies, Watchdogs, Members of Congress, The President. Citizens will speak thru the ballotbox.” (EPA-HQ-OAR-2009-0923-2999-1)

Comment:

“So far, we know that the solutions suggested to end this oil spill were tried unsuccessfully before and now, once again they have failed. In other words, there is no game plan for avoiding this kind of tragedy again. I believe there should not be an "again." BP should be held accountable and to every last person who is potentially ruined by this disaster, even if it means they go out of business. They have not been honest. They have not provided us with truthful information. They cannot be trusted and we need to have our government intervene and take charge. The rules need to be changed.” (EPA-HQ-OAR-2009-0923-3000-1)

Comment:

“Consider this quote from Margaret Mead: "It was not until we saw a picture of the earth, from the moon, that we realized how small and how helpless this planet is - something that we must hold in our arms and care for.”” (EPA-HQ-OAR-2009-0923-3001-1)

Comment:

“This disaster can't be repeated. The Gulf spill has damaged the life of the ocean for decades, not to mention the loss of jobs for all the fishermen and the impact on the tourism industry.” (EPA-HQ-OAR-2009-0923-3002-1)

Comment:

“Th BP disaster in the Gulf of Mexico is enough data to support better regulation of oil and gas drilling.

Please make it so.” (EPA-HQ-OAR-2009-0923-3004-1)

Comment:

“Your great, great, great, great, great, grandchildren will thank you.” (EPA-HQ-OAR-2009-0923-3006-1)

Comment:

“Its time for the truth, and total transparency. The oil spill has proven to us common people that big business cannot be trusted. They have been lying from the first day of the spill. There is no such thing as clean up, the limited media coverage is unforgiveable and must expose it all. The big polluters don't seem to care about any of us. It is all about GREED, GREED, and more GREED.” (EPA-HQ-OAR-2009-0923-3007-1)

Comment:

“This is so important to make big companies liable to the damage they are putting forth into the environment!” (EPA-HQ-OAR-2009-0923-3008-1)

Comment:

“So far I have been very disappointed in the EPA's efforts in protecting the environment. Do this at the very least.” (EPA-HQ-OAR-2009-0923-3009-1)

Comment:

“I know that you represent "the people" and what is in their best interests and I appreciate you for that support.” (EPA-HQ-OAR-2009-0923-3010-1)

Comment:

“Please protect our world for the sake of ALL people!” (EPA-HQ-OAR-2009-0923-3011-1)

Comment:

“Once again we see that hoping an industry will self regulate and govern themselves doesn't work. There hasn't been any measures to make sure that if something horrible goes wrong that companies have any real plan to either avoid disaster or to minimize it. I'm sure there are detailed records of the force of that well if uncapped and how much oil would continue to fill the gulf if there weren't a way to stop it. Clearly more thought is put into getting the fuel out and the profits generated than running something safely with several backup plans. Given the chance we will destroy everything in order to make a buck!

Stop this now! Be responsible. No more drilling! We can't go back in time and re-do this one. Great damage has been done” (EPA-HQ-OAR-2009-0923-3012-1)

Comment:

“A true system of checks and balances must be set in motion - not one in which the committees regulating the industry are tied to that industry. There should be no conflict of interest for the members of a regulatory committee/board/etc.” (EPA-HQ-OAR-2009-0923-3013-1)

Comment:

“The oil and gas industry MUST be held accountable for its pollution and be held to the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. They can afford high paid lobbyists and outrageously high salaries to top executives but as the BP disaster shows, they have lobbied their way out of regulations and ignored safety precautions so they can take more profits. PLEASE finally set things right... include the offshore – and onshore -- oil and gas industry in the regulatory system. We, the public, need meaningful protection. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-3014-1)

Comment:

“Time is not on our side in demanding the public's right to know the amount of global warming pollution emitted by all the oil and gas industry facilities in this country. EPA must move quickly not only to monitor the environment but to ascertain the specific degrees of this pollution.” (EPA-HQ-OAR-2009-0923-3015-1)

Comment:

“We can't afford any more cover ups. The future of this country is at stake with all the life in it. We don't even mention that the ocean provides us with at least 60% of all our oxygen when talking about the oil spills and climate changes, etc.” (EPA-HQ-OAR-2009-0923-3016-1)

Comment:

“The horrifying BP disaster unfolding in the Gulf is a nightmare come true. And the oil and gas industry must be held accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions. This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible. But Big Oil is fighting tooth and nail to keep the EPA from holding them accountable.--THIS IS ABSURD!!!! This is just like holding McDonalds accountable because hot coffee spilled. Please dont be a moron and let \$\$\$ persuade the BP & oil industry do what they want& get out of their responsibilities. The oceans are getting close to ruined & overfished. We all want to help but it MUST start w/the oil companies & BP.” (EPA-HQ-OAR-2009-0923-3018-1)

Comment:

“What I find even more disturbing was in the latest TIME (7 June, p. 25) where I read:” (EPA-HQ-OAR-2009-0923-3019-1)

Comment:

“There should be no monetary limit for the damage that these companies might have to pay for if they are found to have broken any laws, lied or committed any fraud. These companies should not be allowed to drill in any areas in which they can not stop an environmentally damaging spill within two days.” (EPA-HQ-OAR-2009-0923-3020-1)

Comment:

“Regulations that require honest, timely and accurate reporting are essential to the health of the planet and its population.” (EPA-HQ-OAR-2009-0923-3021-1)

Comment:

“Please hang in there and do the right thing to make sure everyone is protected from the irresponsible actions of the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3023-1)

Comment:

“This is our only world. Let's get serious about "maintaining" it!” (EPA-HQ-OAR-2009-0923-3024-1)

Comment:

“We are counting on our government to more closely monitor and regulate these dangerous industries.” (EPA-HQ-OAR-2009-0923-3025-1)

Comment:

“That kind of result from lobbying is one of the reasons that system, also, should be reformed!

They spend the money, they get the result they want!” (EPA-HQ-OAR-2009-0923-3026-1)

Comment:

“These atrocities will continue until the oil companies are held accountable for their actions. Please use your full capacity to stop these disasters and send a message to other oil companies that we are not going to let them get away with making big profits while damaging the planet.” (EPA-HQ-OAR-2009-0923-3027-1)

Comment:

“It is unbelievable that there were not measures in place to divert this horrible accident! Why were there no back up plans in place? BP seems only motivated for quick profit with no respect for the planet! This spill will take decades to clean up if ever! With hurricane season upon us I shudder to imagine this black slick being cast further and further to distant shores to contaminate pristine areas. SHAME on the oil industry!!! Quick blaming Obama and other for your lack of foresight and planning and clean up your own mess!!” (EPA-HQ-OAR-2009-0923-3028-1)

Comment:

“The BP disaster in the Gulf makes it clear to us that Big Oil/Gas cares not a hoot about our atmosphere, our shorelines, or our waters. We have read that BP makes over 9 Million an Hour. That company surely should pay for every bit of damage it has caused. This includes cleaning up the shoreline, clearing the oil blobs out of the Gulf as much as possible, and providing

recompense to the fishermen, farmers, resort owners, and all others who have been hurt by the "Profit over Responsibility" manner in which the business operates." (EPA-HQ-OAR-2009-0923-3029-1)

Comment:

"What has happened in the Gulf of Mexico is outrageous! We must put controls on off-shore drilling NOW." (EPA-HQ-OAR-2009-0923-3030-1)

Comment:

"Please closely regulate drilling to prevent extreme disasters like BP in the Gulf." (EPA-HQ-OAR-2009-0923-3031-1)

Comment:

"What has happened in the Gulf is an outrage." (EPA-HQ-OAR-2009-0923-3032-1)

Comment:

"This is vital. Without proper reporting, companies will do what they want and we will not know what the true situation is." (EPA-HQ-OAR-2009-0923-3033-1)

Comment:

"I urge you to ensure rigorous, detailed, direct pollution measures and reporting of their emissions, with no loopholes, ASAP." (EPA-HQ-OAR-2009-0923-3034-1)

Comment:

"We can't let BP get away with responsibility for this massive oil disaster in the Gulf." (EPA-HQ-OAR-2009-0923-3035-1)

Comment:

"Lobbying is LEGALIZED conflict of economic interest. Conflict of economic interest is UNETHICAL.

Please resist the oil and gas companies lobbying efforts to not be held accountable for their pollution emissions. Ethically, they should be held accountable for all their pollution emissions, whether liquid, solid, or gaseous." (EPA-HQ-OAR-2009-0923-3036-1)

Comment:

“How much of a mess needs to be created before it's realized that pursuing oil as a resource is not environmentally friendly?” (EPA-HQ-OAR-2009-0923-3037-1)

Comment:

“The sooner we make the oil and gas industry fully accountable the sooner it will be apparent to everyone that the true cost of our energy use is much more costly than we assume. Hopefully, this realization will allow us to spend more money to move toward clean, renewable energy and away from our dependence on 19th century energy sources.” (EPA-HQ-OAR-2009-0923-3038-1)

Comment:

“Now that BP has failed twice to cap the oil spewing into the Gulf it is about time they were penalized severely. The EPA needs to develop strong language to hold the oil and gas companys accountable.

We need clean energy now. The oil companies should invest in alternate forms of energy, they will continue to make big money for themselves and maybe gain a conscience at the same time.” (EPA-HQ-OAR-2009-0923-3040-1)

Comment:

“Please!! Mother nature is not going to put up with this foolishness much longer.

This is a disgrace!” (EPA-HQ-OAR-2009-0923-3041-1)

Comment:

“If the funds necessary to fix this disaster were used instead to support renewable energy development, the end of this kind of problem would come much sooner. Let's stop subsidising pollution.” (EPA-HQ-OAR-2009-0923-3042-1)

Comment:

“The BP oil disaster in the Gulf has revealed how the federal government has coddled the oil and gas industry.

No public good is served by permitting the oil and gas industry to avoid reporting greenhouse gas emissions. The EPA is proposing to include include both the offshore and onshore gas and oil industries in reporting system” (EPA-HQ-OAR-2009-0923-3043-1)

Comment:

“This is an important first step....don't delay!” (EPA-HQ-OAR-2009-0923-3044-1)

Comment:

“Are we really to believe this won't happen again if the industry goes unchecked?” (EPA-HQ-OAR-2009-0923-3045-1)

Comment:

“I once worked on a crew doing high altitude oil exploration in the Northern Rockies. I'd never seen that kind of MONEY! They were big spenders on everything! With the Exxon Valdez spill, has anyone ever finally recieved compensation for the destruction of their WAY OFLIFE?!

Due to the economic times, I am back in school studying advanced automotive electronics. I am looking for ways to reduce our carbonfoot print as well as to better control the more obvious toxic vehicle emissions. It is interesting that we talk about the same ideas we used to talk about in my high school Ecology class 35 YEARS ago. When is BIG OIL going to held accountable for bending every RULE, REGULATION, and GOAL for even the most PRIMITIVE technologies to stop FOULING our environment???

I URGE THE EPA TO PROTECT OUR INALIENABLE RIGHTS!!!!” (EPA-HQ-OAR-2009-0923-3046-1)

Comment:

“Any Industry that pollutes should be forced to clean-up their Industries now. This includes foreign conglomerates like BP, Royal Dutch Shell, Aramco, and any other Oil company that knowingly pollutes our air, land, and oceans, and they must be made to pay for all clean-up costs of any pollution they cause.” (EPA-HQ-OAR-2009-0923-3047-1)

Comment:

“The oil and gas industries should provide evidence that they can safely extract and decrease harmful emissions prior to being able to operate their companies. Then they must prove that

safety measures are in place to counteract potential disasters.” (EPA-HQ-OAR-2009-0923-3048-1)

Comment:

“This message is from a real person, who votes in every election. I have been watching the EPA's performance. Please include my wishes in your decisions on BP and holding them accountable. It seems they are guilty of fraud and deception if they said they were prepared to handle a 250,000 barrel per day spill, as I read recently.” (EPA-HQ-OAR-2009-0923-3049-1)

Comment:

“I am interested in knowing about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

EPA has finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action.

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability.

I appreciate your past and continuing leadership in relation to many environmental issues and problems. We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.” (EPA-HQ-OAR-2009-0923-3051-1)

Comment:

“I CHANGED YOUR NAME ALONG TIME AGO TO THE ENVIRONMENTAL POLLUTING AGENCY. I GUES THE NAME STILL FITS.” (EPA-HQ-OAR-2009-0923-3052-1)

Comment:

“KEEP THE PEOPLE INFORMED about how much pollution each company is spewing into our atmosphere is a very good idea. Then they can't hide and send out their PR representatives to give false information. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3054-1)

Comment:

“I have fought the last thirty years for clean air & I don't have many more years left. I wonder if I will ever see any real change, but if we don't see change now under this administration, I doubt we ever will. I continue to write letters & sign petitions, but in truth” (EPA-HQ-OAR-2009-0923-3055-1)

Comment:

“This oil spill will affect both the habitat and the economy of costal tourist areas (beaches) for years to come.” (EPA-HQ-OAR-2009-0923-3056-1)

Comment:

“What sense does it make to let the industry responsible for much of the pollution off the hook for reporting same. This is a no-brainer. Please go get'em.” (EPA-HQ-OAR-2009-0923-3057-1)

Comment:

“i think all the below is essential, that compromise is essential, but to watch our ocean become disgusting with filthy pollution is a tough price to play for getting along.

I firmly believe we have to reach for the next evolutionary step and design new systems. We have to have the vision to take bold steps in problem solving, and to initiate deep changes.

And yes, how on earth can the oil industry not be answerable to the mandatory greenhouse gas reporting rule?” (EPA-HQ-OAR-2009-0923-3058-1)

Comment:

“We absolutely must do everything possible to never have a disaster again like the horrific spill going on and on in the Gulf right now! If EPA does what it is supposed to do, protect the environment, it must rigorously ensure detailed and accurate reporting systems used by the oil and gas industries. Just do it!!!” (EPA-HQ-OAR-2009-0923-3059-1)

Comment:

“It is not exactly rocket science that oil corporations should pay for their own mistakes/spills/problems. They will not own up to their terrible, irretrievable, irreparable error here -- and are not fixing it immediately. We must make an impact for ALL corporations, and we taxpayers are tired of a Congress -- and particularly "conservative" "anti-welfare" Republicans -- voting for us to pay the bill that Corporations successfully" outsource" from their own billing dockets. Do not give them a free pass. This will not only help right now with the US economy

(do NOT put more debt on us taxpayers), but will send a message to all corporations that they will pay the piper if they don't act responsibly.” (EPA-HQ-OAR-2009-0923-3061-1)

Comment:

“No one, unless they've been living under a rock for the last hundred years, can possibly trust Big Oil to care about anything but their bottom line. I fear for my five grandchildren if we do not get this energy issue under some kind of meaningful control.” (EPA-HQ-OAR-2009-0923-3062-1)

Comment:

“I am SO APPALLED that these scoundrels get away with whatever they want. YOU, Ms Jackson, can be at the front line of protecting us. DO WHAT IT TAKES to bring the rampant polluters under greater regulatory control.” (EPA-HQ-OAR-2009-0923-3063-1)

Comment:

“Lets ensure the money and power dont win out over common sense. Please support all efforts to ensure that US citizens are protected from those that would harm the environment for monetary gain. Thanks!” (EPA-HQ-OAR-2009-0923-3064-1)

Comment:

“The oil industry needs to be well regulated and cover all costs of spill clean-up where they occur” (EPA-HQ-OAR-2009-0923-3065-1)

Comment:

“Even without global warming, it would be important to do everything possible to cut down on air pollution. Because I have Multiple Chemical Sensitivity and also lost a non-smoking daughter to lung cancer, I know how important clean air is--not only for me and my family but for everybody.” (EPA-HQ-OAR-2009-0923-3066-1)

Comment:

“After the horrible BP debacle, I'm not sure we can trust any industry to place the protection and quality of life of Americans over profit. The oil, coal and gas industry may not even give accurate information to the EPA regarding the amount of pollution they are generating.

Nevertheless, and even more so now that we have seen for ourselves the damage that companies

like Massey Mines and BP can do, I urge you to require that these companies be required to provide you and the public with the amount of pollution these industries' facilities are emitting.” (EPA-HQ-OAR-2009-0923-3067-1)

Comment:

“We hear so much about the public's "Right to Know" if a politician has an affair or an actor gets a DUI. But knowing those things does nothing for us as human beings. I don't care who has a child out of wedlock but I sure as heck care if energy companies are polluting my water or air. We have the right to know THAT!” (EPA-HQ-OAR-2009-0923-3068-1)

Comment:

“If there is any doubt as to how the industry manages itself when left to monitor itself, let's not forget what is going on in Nigeria. It is but an extension of what has been happening here, where government and industry show nothing but disdain for the health and welfare of the people and the environment.” (EPA-HQ-OAR-2009-0923-3069-1)

Comment:

“I STRONGLY SUPPORT THAT DECISION. I URGE you to ENSURE that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system AS SOON AS POSSIBLE. WITH HOPE AND DETERMINATION” (EPA-HQ-OAR-2009-0923-3070-1)

Comment:

“It is so disturbing to watch BP basically get away with use of weapons of mass destruction, OIL. If this disaster occurred through attacks from a foreign entity (oops, it is a foreign business, British) some strong repercussions would happen. This mass destruction of life on acres of our land and gulf waters needs to never happen again. The only way for that to happen would be to stop oil drilling. We are gradually killing life on this planet and have been for decades now with no change in site toward renewable energy sources. It is now too late for the Gulf and we don't learn our lessons. It basically boils down to greed overpowering the welfare of life on this planet. Too bad.” (EPA-HQ-OAR-2009-0923-3071-1)

Comment:

“If it's not one thing it's another! Now the Gulf of Mexico is filling up with crude oil. What's the next surprise?” (EPA-HQ-OAR-2009-0923-3072-1)

Comment:

“In addition to the obvious, I would like to think our Congress will finally try to insure that my grandchildren, and their own, have at LEAST as good a world to live in as we do now. Make them accountable.” (EPA-HQ-OAR-2009-0923-3073-1)

Comment:

“The people who make the mess should be the ones who are responsible for cleaning it up. Why are they so special that they are let off the hook again and again? If the cleanup bankrupts them, then so be it. They're bankrupting the planet with their toxins. It's high time we switched over to clean, renewable energy sources anyhow.” (EPA-HQ-OAR-2009-0923-3074-1)

Comment:

“Furthermore, the solution to such a devastating oil spill should have been, and must now be, put in place to resolve the problem immediately. No more drilling without solutions to the problems immediately available and the plan to implement the solution in place.” (EPA-HQ-OAR-2009-0923-3075-1)

Comment:

“Like many Americans I am saddened and alarmed by the destruction in the Gulf caused by BP and lax regulation of their actions.” (EPA-HQ-OAR-2009-0923-3076-1)

Comment:

“This is NOT a country of/ by /for the corporate titans and their lackeys. It is supposed to be a country of/by /for the people. BP and it's corporate allies will weasel their way, or bribe their way out of paying for this catastrophe. Some say "What's new about that" and shrug. It is up to you and my President to put a government gun to their heads and force them to do ALL that is right and fair. They will never police themselves and do what is right. We all know that is apiece of Bush/Cheney BS.” (EPA-HQ-OAR-2009-0923-3077-1)

Comment:

“It is obvious from the current BP catastrophe and BP's action to suppress information that there is indeed an information problem. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3078-1)

Comment:

“Truly, I believe that we need strong leadership more than anytime in history. We all know that the population of the planet is increasing dramatically. If we do not discover a cleaner energy, we will dome future generations. We only have the EPA to keep these mega companies accountable. Will they fail to America? Or, will we continue to let GREED rule our planet until it is too late to save ourselves?” (EPA-HQ-OAR-2009-0923-3079-1)

Comment:

“This is too important to ignore or overlook.” (EPA-HQ-OAR-2009-0923-3080-1)

Comment:

“I support the EPA's plan to make the oil and gas industry accountable for mandatory greenhouse gas reporting. Make the system use rigorous, detailed, direct pollution measurements and see that industry's emissions are included in the reporting system as soon as possible. I am disgusted by the BP disaster!” (EPA-HQ-OAR-2009-0923-3081-1)

Comment:

“This industry is one of the biggest polluters. They should not be exempt.” (EPA-HQ-OAR-2009-0923-3082-1)

Comment:

“The BP people should be so ashamed. Do they have any idea of how dreadful this all is? They should be brainstorming for ways to compensate all the people and wildlife affected for this atrocity.” (EPA-HQ-OAR-2009-0923-3083-1)

Comment:

“Day after day the news gets worse. The BP oil disaster unfolding in the Gulf

It is past time to hold the oil and gas industy accountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas reporting rule like they do on every safety regulation that would provide protection from their disasters.

This year, the EPA is proposing to set things right and finally include the offshore -- and onshore -- oil and gas industry in the system. I strongly support that decision. I urge you to ensure that the

system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-3084-1)

Comment:

“The earth belongs to all of us and has to be protected! If these giant corporations are allowed to destroy it, where will we go? Nowhere! The human species depends upon the earth for our very life and multi-national corporations don't own it! Human beings do!” (EPA-HQ-OAR-2009-0923-3085-1)

Comment:

“Please note that I'm aware corrupt BIG OIL and BIG GAS ROBBER BARON Sand their lobbyists are busy at work attempting to sway the EPA. Hopefully, you don't succumb to their spiel and stick to your guns!” (EPA-HQ-OAR-2009-0923-3086-1)

Comment:

“As aging seniors, my husband and I don't want to leave the world a worse place than the world we have enjoyed. Big Oil (and little) need to have the same attitude and desire. The disastrous spill should lead to more accountability, not less or the same. Extractive industries need more regulation. Now! Thus we join other environmentalists and citizens in the following:” (EPA-HQ-OAR-2009-0923-3088-1)

Comment:

“The time for this is incontestably now.” (EPA-HQ-OAR-2009-0923-3089-1)

Comment:

“I live in Phoenix, Az and our news media is overwhelmed with immigration issues but I have paid alot of attention to the recent oil pipeline disaster because I am not a native of Phoenix, but a transplant from Virginia. I still have family along the east coast to include Florida and I am hearing horror stories from home about what is happening to my beloved countrie's coastline and waterways.” (EPA-HQ-OAR-2009-0923-3090-1)

Comment:

“What will it take to stop the vise grip that the oil industry has on our government. It is far past the time that their reckless actions should be stopped” (EPA-HQ-OAR-2009-0923-3091-1)

Comment:

“Don't let these oil and gas companies off the hook. The American people have a right to know who is messing with their lives and hastening their deaths with dirty air. Got it? We are angry, and it is not going away any time soon.” (EPA-HQ-OAR-2009-0923-3092-1)

Comment:

“it's obvious that big companies don't care about keeping the environment safe for future generations, the BP oil spill is just the most recent example of how this is true. this EPA was formed to PROTECT THE ENVIRONMENT!!!! so, is it too much to ask that somebody in a government agency actually do their jobs?? please don't let these jerks get away with poisoning my family and my environment. the EPA needs to monitor these money-hungry, self-serving jerks for the wellbeing of the world.” (EPA-HQ-OAR-2009-0923-3093-1)

Comment:

“We are regard consumers of strawberries. We hope that our consumption does not participate in poisoning the workers who pick the berries and in our own poisoning as well as environmental damage. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3094-1)

Comment:

“I want to know why any oil co. is allowed to drill a well in the depths and not have a good, solid back-up plan. I understand Norway has a much better system. Where were the "regulators"? We need tight, solid regulations with back-up plans A, B & C. This is our Earth.” (EPA-HQ-OAR-2009-0923-3095-1)

Comment:

“This recent disaster needs to be a wake up call to all of us, we need to let go of our dependency to oil, we need to stop allowing the ultra rich ultra untouchable oil companies carte blanche, time to hold them accountable and allow us to test out alternative resources for fuel. Stop the Madness!!” (EPA-HQ-OAR-2009-0923-3096-1)

Comment:

“Perhaps the good thing that can come from this tragedy is that the EPA will exercise sensible regulation with the support of a more aware public.” (EPA-HQ-OAR-2009-0923-3097-1)

Comment:

“Every time i turn on the TV, there is more sad news about the oil spill in the Gulf.” (EPA-HQ-OAR-2009-0923-3098-1)

Comment:

“Of course polluters should be required to disclose how much pollution they are producing, isn't that obvious!” (EPA-HQ-OAR-2009-0923-3100-1)

Comment:

“End ALL offshore drilling by12-31-10.” (EPA-HQ-OAR-2009-0923-3101-1)

Comment:

“The Gulf Coast will NEVER be the same again. How come Big Oil can just drill away without any means of handling spills???” (EPA-HQ-OAR-2009-0923-3102-1)

Comment:

“Now is the time to cleanup big oils act. Stand for whats right not what is profitable. our world depends on it. thank you” (EPA-HQ-OAR-2009-0923-3103-1)

Comment:

“If we are to resolve the greenhouse emissions problem our world faces today, it will only happen if everyone in all aspects of the economydoes their fair share. Everyone needs to be accountable, even and maybe especially the big polluters.” (EPA-HQ-OAR-2009-0923-3104-1)

Comment:

“All ends of Big Oil must be accountable for their product and action.” (EPA-HQ-OAR-2009-0923-3105-1)

Comment:

“The air we breath belongs to us all, and we must have information about its health so we can support policies that protect us all. As a mom with two children with asthma, I am especially sensitive to this issue.” (EPA-HQ-OAR-2009-0923-3106-1)

Comment:

“PUBLIC SERVANTS MUST SUPPORT PUBLIC ETHICS - OPENNESS, FAIRNESS, AND PROTECTION OF THE PUBLIC INTEREST” (EPA-HQ-OAR-2009-0923-3107-1)

Comment:

“As we have seen from the financial system's meltdown and the BP oil spill companies have become more and more negligent and riskful, putting our coastlines and our entire nation at risk. The answer is stronger sensible regulation in all sectors, the EPA has to stand up to its task and really try to protect the environment.” (EPA-HQ-OAR-2009-0923-3108-1)

Comment:

“I am a citizen and a voter that is tired of begging for responsible actions by our elected representatives however I find the necessity again to beg for your action.” (EPA-HQ-OAR-2009-0923-3109-1)

Comment:

“If I polluted your backyard, you would expect me to clean it up and leave as BEFORE I found it. Well, I expect "my backyard" to be cleaned and left as BEFORE this happened and it never happen again. Propose and enforce the strictest regulations you can!!!!!!” (EPA-HQ-OAR-2009-0923-3110-1)

Comment:

“Let's make all the oil companies follow the law and not side step any of the rules in place that protect our environment. The money they spend on lobbyists could have bought the safety protection that would have stopped what happened in the gulf this year.” (EPA-HQ-OAR-2009-0923-3111-1)

Comment:

“STOP OFF SHORE DRILLING NOW! MAKE THE OIL COMPANIES CLEAN UP THEIR MESS NOW! PLEASE DO YOUR JOB E.P.A., and PUT STRONG REGULATIONS in place so that we don't have another disaster like we have in the gulf.” (EPA-HQ-OAR-2009-0923-3112-1)

Comment:

“We need a strong EPA response. The oil and gas industry has to realize that they can no longer act as though they are the only energy industry. It's time that they start acting as an industry in decline world oil has peaked in the past decade - not business as usual. No longer can oil and gas make their huge profits while society at large has to pay the tab for cleaning up after them. They need to take ownership for their irresponsible activities!” (EPA-HQ-OAR-2009-0923-3113-1)

Comment:

“There is no turning back - we ALL need to work together to have an effect and preserve a habitable planet - no matter the cost!” (EPA-HQ-OAR-2009-0923-3114-1)

Comment:

“I want your rigorous leadership in cutting harmful air pollution;I want you to sit on these purveyors of corruption and confront them at every attempt to sidestep their responsibility to this planet and to me. The situation,---isn't that a nice word for the unbounded catastrophe now occurring in the Gulf of Mexico--- with British Petroleum is the'pointed finger', so to speak. We must reduce our dependence on destructive sources of energy, and creat new job opportunities by strengthening America's clean energy economy” (EPA-HQ-OAR-2009-0923-3115-1)

Comment:

“It is time to make all of this transparent - we need to drill but wealso need to ensure that in the process all safeguards are in place and additional pollution of our waters - rivers and oceans - are not in jeopardy. It is way past time to hold this industry accountable for their actions. Otherwise what good are our government agencies except money pits for wasting our tax dollars?” (EPA-HQ-OAR-2009-0923-3116-1)

Comment:

“I HEAR THAT THE AMERICAN PEOPLE MAY BE PICKING UP THE BILL FOR THE BP OIL DISASTER. THIS IS JUST STUPID AND CRAZY!

LAST YEAR THE INDUSTRY LOBBIED ITS WAY OUT OF THE MANDATORY GREENHOUSE GAS REPORTING RULE. THIS IS ALSO STUPID AND CRAZY.” (EPA-HQ-OAR-2009-0923-3117-1)

Comment:

“Surely this Gulf of Mexico disaster should awaken everyone (even BIG OIL) to the fact that the search for, and use of, more greenhouse-gas-producing fossil fuels will only continue to damage

our one and only planet. Your agency can help slow this form of devastation. We urgently need that help!" (EPA-HQ-OAR-2009-0923-3118-1)

Comment:

"I strongly support that decision. I urge you to ensure that the system uses rigorous,detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible." (EPA-HQ-OAR-2009-0923-3120-1)

Comment:

"It is clear that corporations will not act ethically, or in any wayself-police.

It is up toThe EPA to use every means possible to prevent future environmental catastrophes, through exacting the most severe penalties upon corporations that fail to safeguard the common environment around their works.

This includes the waters, groundwaters, land, and the air." (EPA-HQ-OAR-2009-0923-3121-1)

Comment:

"This avoidance of the law, the public good, and the government oversight neglect must all end." (EPA-HQ-OAR-2009-0923-3121-2)

Comment:

"This industry has done no more than tear down the quality of life for many by inflating food, heating, and transportation costs. While it continues to pocket profits and does nothing to improve energy resources and create the jobs the alternative energy sources industrywould do. The billionaires have harmed enough people for far too many years. It is time they paid for what they do as we have always done." (EPA-HQ-OAR-2009-0923-3122-1)

Comment:

"This needs to be done to help protect all our citizens. Thank you for your help in getting this done." (EPA-HQ-OAR-2009-0923-3123-1)

Comment:

"Americans MUST be informed about who is Polluting the Environment !" (EPA-HQ-OAR-2009-0923-3124-1)

Comment:

“Obviously there will have to be major penalties, serious fines AND jail time for higher ups, for failure to report, and the EPA will have to have full enforcement capabilities...WITH TEETH!!” (EPA-HQ-OAR-2009-0923-3125-1)

Comment:

“IT IS A CRIME TO ALLOW CHILDHOOD CANCERS FOR CORPORATE PROFITS - IF THEY CAN'T GET THE ENERGY CLEANLY, THEN BY PASS THAT DIRTY SOURCE - SPAIN AND GERMANY ARE WAY AHEAD OF US IN CLEAN ENERGY SOURCES.” (EPA-HQ-OAR-2009-0923-3126-1)

Comment:

“The very fact that letters have to be written to ask you to "please" do your job is testament to the undeniable fact that you and your croonies have been bought off. Shame on you. Good thing you are in an appointed position. Actually, too bad for the population at large.

I hope you have children and grand children that will never know what clean air and water is like. What a deserving and telling testament to the selfishness and greed of their own parents/grand parents.” (EPA-HQ-OAR-2009-0923-3127-1)

Comment:

“And please encourage research and development of alternative forms of power for our nation and the world.” (EPA-HQ-OAR-2009-0923-3128-1)

Comment:

“It is important that government policy making be done within full and complete view of the public. All information that is part of the decision making process must be fully available to the public. Inevitably, ordinary Americans end up paying the high price of backroom deals done based upon undisclosed information, by unnamed participants.” (EPA-HQ-OAR-2009-0923-3129-1)

Comment:

“Recent events with BP's catastrophic oil spill show us that we cannot trust oil companies to do the right thing for our citizens. Profit is a stronger motivator for some. I believe that the EPA

should have more data to obtain a more complete understanding of all the emissions. I was a process chemist for a major chemical company for 32 years and we took EPA regulations seriously and complied. It was good for our safety on the job, our workers' health and the environment. Please help current companies, especially the oil and gas companies, to do the same.” (EPA-HQ-OAR-2009-0923-3130-1)

Comment:

“The BP Deepwater Horizon oil-rig disaster is a sad and stark reminder that oil is a dirty, dangerous, and deadly energy source that has no place in a 21st-century energy economy. I urge you to engage every resource available to address the immediate cleanup and recovery needs of Gulf Coast residents, businesses, wildlife, and marine life. I've had enough - we need a commitment to end all new proposals for offshore oil drilling and permanently protect our coasts. Instead of risking our lives, our coasts, our clean air, and our security by perpetuating our addiction to oil, it's time to build a clean-energy economy that means more jobs, less pollution, and real energy independence.

Do everything you can to put voltaic solar panels on every roof in the US. This is enough energy for now and the future, including the supply for electric cars for everyone and all manufacturing plants. You can close down the heat creating power plants, eliminate the need for water cooling, reduce dangerous coal mining and substantially reduce global warming by reducing CO² emissions.” (EPA-HQ-OAR-2009-0923-3131-1)

Comment:

“Our world, which has become smaller, is far too important for anyone to take it lightly. The oil companies have been guilty for years of not taking their responsibilities seriously. Now is the time to do something about it. The world can't afford their lack of responsibility. I hope they will realize that as the world suffers from their irresponsibility so will they.” (EPA-HQ-OAR-2009-0923-3132-1)

Comment:

“Most Americans didn't even realize that oil and gas companies have not been held accountable. This is unthinkable and unjust. Please 'right this wrong!'.” (EPA-HQ-OAR-2009-0923-3133-1)

Comment:

“We have also learned that we cannot expect them to self-regulate. Strong regulations, guidelines and enforcement must pertain.” (EPA-HQ-OAR-2009-0923-3134-1)

Comment:

“You can make a difference in the health of our country and we hope you will take advantage of your position and do so. Oil and gas companies have taken advantage of lax laws.” (EPA-HQ-OAR-2009-0923-3135-1)

Comment:

“and CHARGE them so that it is too costly to continue as they have.” (EPA-HQ-OAR-2009-0923-3135-2)

Comment:

“THIS WOULD BE A GOOD TIME TO ACT ON THIS BECAUSE THE AMERICAN PEOPLE THINK AN OIL COMPANY IS RESPONSIBLE FOR THE OIL LEAK IN THE GULF. THE ACCIDENT HAPPENED BECAUSE OF LACK OF GOVERNMENT OVERSIGHT, BUT OIL COMPANIES ARE ON THE DEFENSIVE.” (EPA-HQ-OAR-2009-0923-3136-1)

Comment:

“This is the perfect moment to require the oil and gas industry to disclose its global warming pollution--its actual measured emissions data. I can only imagine that most American citizens would approve,given the continuing horrific situation in the Gulf of Mexico. There is no reason to exempt this industry from a requirement that applies toother big emitters. (And I have gotten a little money from the oil and gas industry-full disclosure.)

With the required information, we could make better public policy, keep our citizens informed about sources of pollution, and hold emitters accountable.

Please take the lead in this area and help reduce our American carbon footprint!” (EPA-HQ-OAR-2009-0923-3137-1)

Comment:

“Please, make sure government is doing the job we taxpayers are paying for-enforcing the law-equally and fairly-and protecting the public.” (EPA-HQ-OAR-2009-0923-3138-1)

Comment:

“What more has to happen to our country before we wake up and have irreparable damage. I believe we already have it. Please hold the companies accountable.” (EPA-HQ-OAR-2009-0923-3139-1)

Comment:

“By the way, thanks to all of the administration for their diligent efforts to control BP and the disaster in the Gulf - and in particular your attempts to control the disbursements they are using to hide the amount of oil. "We the people" appreciate all efforts to control the mega corporations' immoral and dangerous behavior.” (EPA-HQ-OAR-2009-0923-3140-1)

Comment:

“We are serious about stopping the oil industry from destroying our planet, so we expect our government representatives to voice our demands, not to cater to the industry you are to regulate. So, we need transparency to do that.” (EPA-HQ-OAR-2009-0923-3141-1)

Comment:

“Our country was founded by and for the people, not corporations. We know for the better good of society that we must transform from a fossil-fuel based energy source to renewable energy sources. We cannot afford in any way the environmental calamity that we are now witnessing in the Gulf of Mexico.

Please take the important step of including oil and gas industries in stringent pollution measurement systems. We need it now more than ever.” (EPA-HQ-OAR-2009-0923-3142-1)

Comment:

“It's time the EPA starting doing the job it was created to do. It is imperative that oil and gas companies that are gouging huge profits from the public and destroying the environment, wildlife, sites of cultural antiquity and our children's future, be held accountable. Please stand tall and strong and hold those responsible for environmental disasters accountable. Thank you for allowing me to comment.” (EPA-HQ-OAR-2009-0923-3143-1)

Comment:

“As a parent and global citizen, I strongly support that decision.” (EPA-HQ-OAR-2009-0923-3145-1)

Comment:

“Do not allow the special interests groups naysayers to dilute the truth about Golbal Warming! It's here and it's happening!” (EPA-HQ-OAR-2009-0923-3146-1)

Comment:

“The oil disaster in the gulf should highlight the issue even more. People helping clean the area have to deal with who knows what kind of side effects from the oil and the exposure to them breathing this stuff in while they are cleaning. This needs to be done.” (EPA-HQ-OAR-2009-0923-3147-1)

Comment:

“STAND FIRM FOR OUR FUTURE!” (EPA-HQ-OAR-2009-0923-3148-1)

Comment:

“Thank you for your time, hard work and for your consideration of this request. All are greatly appreciated.” (EPA-HQ-OAR-2009-0923-3150-1)

Comment:

“My name is Michael Tilson. I am one of MANY concerned citizens of these United States. With what is going on in the Gulf of Mexico WE as a people must take action to avoid another DISASTER. I am a certified Oil Response Volunteer, yet I have NOT been contacted as to where I should respond. I have always been told that QUICK response to trouble is the best way to eleviate the damage. Why are you so slow to react?” (EPA-HQ-OAR-2009-0923-3151-1)

Comment:

“It's time to put a lid on everyone who pays you in the government to'keep quiet'.Stop it now or we will find people for office that will.” (EPA-HQ-OAR-2009-0923-3152-1)

Comment:

“In addition, make them responsible for having disaster remediation in place BEFORE the disaster occurs to avoid another ecological tragedy!” (EPA-HQ-OAR-2009-0923-3153 -1)

Comment:

“In addition, make them responsible for having disaster remediation in place BEFORE the disaster occurs to avoid another ecological tragedy!” (EPA-HQ-OAR-2009-0923-3154-1)

Comment:

“With this Big Oil Armageddon in the Gulf, the oil, gas and nuclear industries must account for everything they do...the Gulf disaster has shown the world that transparency, responsibility and accountability are absolutely essential.” (EPA-HQ-OAR-2009-0923-3155-1)

Comment:

“We're counting on you to "do the right thing" and help disconnect us from the dark shadow of corporate secrecy and greed that infect all our lives ultimately-you and your family, too!!!” (EPA-HQ-OAR-2009-0923-3156-1)

Comment:

“There has been discussion of raising the cap on liability to 10B dollar. I suggest that there should be no cap other than complete liability. BP widely sidestepped or ignored regulations and safety concerns. It is quite possible that a 10B dollar cap will turn out to possibly be a gift to big oil. Way less than the cost of their malfeasance. If you break it, you own it, even if it bankrupts your corporation.” (EPA-HQ-OAR-2009-0923-3157-1)

Comment:

“This is our only world. Let's get serious about "maintaining" it!” (EPA-HQ-OAR-2009-0923-3158-1)

Comment:

“Please help save our planet from those who would destroy it for their own personal gain. Help us put a stop to the manipulation of the population, the robotization of the electorate and the criminalization of the conscientious objectors that work for the realization of the dream of the Founding Fathers. God bless you and God bless America.” (EPA-HQ-OAR-2009-0923-3159-1)

Comment:

“When are we going to get government for the people, instead of government for the big corporations?” (EPA-HQ-OAR-2009-0923-3160-1)

Comment:

“I support including the offshore - and onshore - oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-3161-1)

Comment:

“if not immediately.” (EPA-HQ-OAR-2009-0923-3162-1)

Comment:

“If this isn't done I can't see how the continued existence of the EPA can be justified.” (EPA-HQ-OAR-2009-0923-3163-1)

Comment:

“The disaster in the Gulf has revealed our powerlessness over these situations when we do not take the necessary precautions against them. It seems insane to me that we do not hold companies to higher safety standards.” (EPA-HQ-OAR-2009-0923-3164-1)

Comment:

“This oil spill is truly frightening and is the result of years of assuming that our dependence on oil is harmless. It isn't! We must make sure industry pays the true price of petrochemicals and that these costs are passed on to the consumer, not hidden.” (EPA-HQ-OAR-2009-0923-3165-1)

Comment:

“The public has a right to know about the global warming pollution being emitted by the oil and gas industry. So far, the industry has successfully delayed regulation of these emissions. We need strong leadership from EPA requiring the oil and gas industry to fully disclose its global warming pollution. We need accurately measured data not industry estimates.

Oil and gas emissions must be aggregated and reported as one facility.” (EPA-HQ-OAR-2009-0923-3166-1)

Comment:

“We appreciate your strong leadership in reducing harmful air pollution and ensuring full disclosure and transparency of green house gas emissions from the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3166-2)

Comment:

“as it successfully eviscerated oversight of the Gulf oil rigs.

We need your strong leadership in finalizing rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Protective disclosure requirements need to rely on actual measured emissions data, not industry estimates or PR. Full disclosure would provide policymakers with critical information in the fight against global warming, ensure transparency for all Americans, letting us know the largest emitters in our neighborhoods across the country, and hold large emitters accountable for their emissions.” (EPA-HQ-OAR-2009-0923-3167-1)

Comment:

“In order to assure clean air and water, move towards clean energy, and limit climate change impacts to the extent possible, we need to know where the big inputs to pollutants are. The oil and gas industry, certainly known for its political clout, cannot keep us in the dark about the extent of their contribution to global warming pollution.” (EPA-HQ-OAR-2009-0923-3168-1)

Comment:

“Whose side are you on, the public's or the polluters'? Your mandate is to protect the environment, not to allow polluters to get away with unknown amounts of damage to it.” (EPA-HQ-OAR-2009-0923-3169-1)

Comment:

“Transparency is our best defense in keeping corporate decisions favorable to the American public.” (EPA-HQ-OAR-2009-0923-3170-1)

Comment:

“I would like to make a comment about the need to establish comprehensive pollution disclosure requirements for large greenhouse gas emitters in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3171-1)

Comment:

“It is time that common sense trump greed, even though the greedy pigs do run the world. Never forget, they are only 10 percent of the world population. It is time the rest of the 90 percent of us

put an end to the 10 percent that would destroy the earth just to fill their greedy pockets a little fuller.” (EPA-HQ-OAR-2009-0923-3172-1)

Comment:

“This is only a gesture.

But if this is true:” (EPA-HQ-OAR-2009-0923-3173-1)

Comment:

“Then I say this:” (EPA-HQ-OAR-2009-0923-3173-2)

Comment:

“Gas and oil industries should be held accountable for ALL their actions, just as we ordinary people are held accountable for ours. The laws should be for ALL, not just a few.” (EPA-HQ-OAR-2009-0923-3174-1)

Comment:

“We are counting on our government to more closely monitor and regulate these dangerous industries.” (EPA-HQ-OAR-2009-0923-3175-1)

Comment:

“That kind of result from lobbying is one of the reasons that system, also, should be reformed!” (EPA-HQ-OAR-2009-0923-3176-1)

Comment:

“I STRONGLY SUPPORT THAT DECISION.

I URGE you to ENSURE that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system AS SOON AS POSSIBLE.” (EPA-HQ-OAR-2009-0923-3177-1)

Comment:

“Furthermore, the solution to such a devastating oil spill should have been, and must now be, put in place to resolve the problem immediately.No more drilling without solutions to the problems

immediately available and the plan to implement the solution in place.” (EPA-HQ-OAR-2009-0923-3178-1)

Comment:

“Last year, the industry PAID-OFF Congressional Members to get out of the mandatory greenhouse gas reporting rule, which would have tracked massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-3179-1)

Comment:

“I STRONGLY support that decision. I REQUIRE you to ensure that the system uses RIGOROUS, DETAILED, direct pollution measurements and that the industry's EMISSIONS are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-3179-2)

Comment:

“While it is true that stringent regulation reduces industry profits, it is time we admit that the right of the majority to a poison-free world is more important than the right of a few to accumulate unlimited wealth.” (EPA-HQ-OAR-2009-0923-3180-1)

Comment:

“I am personally under threat from the gas industry as they will soon invade my home in Broome County NY, pollute my air, my water, my peace and quiet, destroy my wildlife and my beautiful view and the countryside.” (EPA-HQ-OAR-2009-0923-3181-1)

Comment:

“Now is the time to correct the regulations.” (EPA-HQ-OAR-2009-0923-3182-1)

Comment:

“We must generate better oversight and inspection in these areas.” (EPA-HQ-OAR-2009-0923-3183-1)

Comment:

“And please include cleanup plans for new depths of drilling in requirements for the industry.” (EPA-HQ-OAR-2009-0923-3184-1)

Comment:

“I live on the gulf coast of Florida. Twice since this oil disaster, we have experienced bad smelling air, sore throats and coughing, when the wind comes from the northeast.” (EPA-HQ-OAR-2009-0923-3185-1)

Comment:

“I call upon you” (EPA-HQ-OAR-2009-0923-3186-1)

Comment:

“Also, please make them accountable to the Clean Water Protection Laws. I live in the midst of natural gas drilling and am very concerned about our water supply. They have already polluted several private wells.” (EPA-HQ-OAR-2009-0923-3187-1)

Comment:

“As a Professor Emeritus of Zoology and Environmental Science, I urge you” (EPA-HQ-OAR-2009-0923-3189-1)

Comment:

“Thank you for your attention to my comments!” (EPA-HQ-OAR-2009-0923-3189-2)

Comment:

“Companies and corporations are acting with impunity. They don't think that they will be held accountable for what they spew into the air.It's time that they were responsible for every aspect of their production process.” (EPA-HQ-OAR-2009-0923-3190-1)

Comment:

“As a resident of Houston, I am especially aware of the amount of pollution tossed into the air by these facilities. When the wind isin the right direction you smell it. Under all circumstances, you cansee visible particles spewing out as you drive past the plants.” (EPA-HQ-OAR-2009-0923-3191-1)

Comment:

“Thank you in advance for stepping up to the plate with the oil and gas industry so that our country can move forward on the global warming issue without any more delays.” (EPA-HQ-OAR-2009-0923-3192-1)

Comment:

“My wife suffers from asthma and severe allergies. Air pollution is robbing her of a decent quality of life. Of course, she's not alone. Millions of people suffer as she does. Just as important are the millions more that will get sick from air pollution both outdoor and indoor. Over and above the question of global warming pollution, any company that uses or emits toxic chemicals in the production of their products and services should be required to disclose those toxic chemicals to the public. If federal and state governments continue to permit the use of toxic materials in products, then we, the public, have a right to know what poisons we will come in contact with when using those products or the byproducts of the manufacture of those products. The European Union for a its gross faults has one thing right: the precautionary principle. Until proven safe, a chemical or material can't be used in industry.

That said, climate change (the term I prefer over the somewhat marginalized term "global warming") pollution must be made public as well.” (EPA-HQ-OAR-2009-0923-3193-1)

Comment:

“What are YOU (EPA) doing about this oil spill. This has global ramifications.” (EPA-HQ-OAR-2009-0923-3194-1)

Comment:

“Please do not move backward in this age of oil scum that is only very slowly beginning to raise it's ugly head in the Gulf of Mexico. The people want their government to protect them not join with the polluters or look the other way when it's politically expedient. America honors leaders not politicians!” (EPA-HQ-OAR-2009-0923-3195-1)

Comment:

“I support the EPA's plan to make the oil and gas industry accountable for mandatory greenhouse gas reporting. Make the system use rigorous, detailed, direct pollution measurements and see that industry's emissions are included in the reporting system as soon as possible. I am disgusted by the BP disaster!” (EPA-HQ-OAR-2009-0923-3196-1)

Comment:

“I live along the Gulf of Mexico and am terribly disturbed about the events of the past month. I am sure you feel the same pain that is happening to your native lands.” (EPA-HQ-OAR-2009-0923-3197-1)

Comment:

“My husband and I feel more than strongly if we have learned anything watching” (EPA-HQ-OAR-2009-0923-3198-1)

Comment:

“If this message sounds desperate, it should. The situation is desperate, the fate of the inhabitants is desperate, as is the fact of the birds, fish, other sea creatures and local wildlife. Such a situation must never be risked again!” (EPA-HQ-OAR-2009-0923-3198-2)

Comment:

“Should this happen again or should the hurricane season seriously amplify what has already happened, a major portion of the entire Atlantic ocean could be affected. Vast amounts of marine, shoreline and even inland ecologies could be permanently destroyed.

And if we continue to delay effective action on climate change we will face a far greater peril.” (EPA-HQ-OAR-2009-0923-3199-1)

Comment:

“This is really an easy call.” (EPA-HQ-OAR-2009-0923-3201-1)

Comment:

“Full disclosure is the right way to go.” (EPA-HQ-OAR-2009-0923-3202-1)

Comment:

“Maybe I'm confused here. Does the EPA work to protect the environment, or does it work to protect and encourage polluters?” (EPA-HQ-OAR-2009-0923-3203-1)

Comment:

“We must be the voice of those that cannot speak for themselves... our earth and its precious inhabitants. Please take a stand today... and demand positive environmental change and eco-responsibility.

Tomorrow simply may be too late.” (EPA-HQ-OAR-2009-0923-3204-1)

Comment:

“This industry is one of the biggest polluters. They should not be exempt.” (EPA-HQ-OAR-2009-0923-3206-1)

Comment:

“Its time to stop socializing the risks, while privatizing the profit.” (EPA-HQ-OAR-2009-0923-3207-2)

Comment:

“We have no time to lose. We need immediate response to avoid further disasters.” (EPA-HQ-OAR-2009-0923-3209-2)

Comment:

“End ALL offshore drilling by 12-31-10.” (EPA-HQ-OAR-2009-0923-3214-1)

Comment:

“Let's make all the oil companies follow the law and not side step any of the rules in place that protect our environment. The money the spend on lobbyists could have bought the safety protection that would have stopped what happened in the gulf this year.” (EPA-HQ-OAR-2009-0923-3215-1)

Comment:

“Americans will applaud a strong stance taken by the EPA and will blame those who do not protect our natural resources

Thank you for taking courageous and thorough action.” (EPA-HQ-OAR-2009-0923-3217-1)

Comment:

“I urge you to TAKE OVER THE OPERATION to stop the gushing oil, an to clean up, using rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system as soon as possible.” (EPA-HQ-OAR-2009-0923-3218-1)

Comment:

“I cannot emphasize enough that oversight MUST rigorous and must be constant. We cannot afford any more catastrophies like the one caused by BP. We only have one planet, we MUST do everything to protect it!” (EPA-HQ-OAR-2009-0923-3219-2)

Comment:

“My wife is a severe asthmatic who has been in a hospital ER twice inMay of this year. We really need the air cleaned up. This would be agreat start.” (EPA-HQ-OAR-2009-0923-3220-1)

Comment:

“Global climate change is a serious issue with potentially devastatingconsequences. America cannot afford to ignore this issue.” (EPA-HQ-OAR-2009-0923-3221-1)

Comment:

“The amount of polutants these facilities dump into the air should not be corporate secrets. Any excuse that disclosing this information would lead to a competitive disadvantage or additional costs should not be accepted because such excuses have no bearing on the need for cleaner air.” (EPA-HQ-OAR-2009-0923-3223-1)

Comment:

“It is high time that they wereheld accountable for their actions and not be let off the hook. The price is just too high.” (EPA-HQ-OAR-2009-0923-3224-1)

Comment:

“It is time to make all of this transparent - we need to drill but wealso need to ensure that in the process all safeguards are in place and additional pollution of our waters - rivers and oceans - are not in jeopardy. It is way past time to hold this industry accountable for their actions. Otherwise what good are our government agencies except money pits for wasting our tax dollars?” (EPA-HQ-OAR-2009-0923-3225-1)

Comment:

“To do so would be a positive, crucial step toward protecting our future.” (EPA-HQ-OAR-2009-0923-3226-1)

Comment:

“We need to stop pandering to the oil/gas industry to save our beautiful planet!” (EPA-HQ-OAR-2009-0923-3227-1)

Comment:

“P.S...Where did the workers come from, the day that the President came here?? Check into that, please!! BP should go back where they came from, Louisiana don't need these liars!!” (EPA-HQ-OAR-2009-0923-3228-1)

Comment:

“i have a right to know HOW i am being killed.” (EPA-HQ-OAR-2009-0923-3231-1)

Comment:

“I'm sick of the lack of regulation of the big oil companies. How much more damage will be done before anything is done to rein them in?” (EPA-HQ-OAR-2009-0923-3234-1)

Comment:

“I whole heartedly support the following message crafted by the Sierra Club. How on earth can we give these people a pass? I am horrified by what politics and the Fog of Greed has brought to the door step of our country.” (EPA-HQ-OAR-2009-0923-3235-1)

Comment:

“For our own safety and the environments, we need not be dependent on oil, let alone foreign oil. We need to take care of ourselves with our own resources and take good care of our planet.” (EPA-HQ-OAR-2009-0923-3236-1)

Comment:

“The world needs to change, and you can be part of the solution. While it seems that BP is stepping up and accepting fiscal responsibility for this disaster, let's ensure that every polluter is

held accountable. They make the big profits, they can pay for their messes.” (EPA-HQ-OAR-2009-0923-3237-1)

Comment:

“Please hold them accountable and don't let them get away with this.” (EPA-HQ-OAR-2009-0923-3238-1)

Comment:

“The Gulf will be a virtual dead zone for years, if not decades. The cost to marine life, fish and mammal, is immeasurable; the cost to livelihoods throughout the area, criminal. How will BP ever pay for the aftermath when they're already actively denying the present stating there are no plumes of oil within the ocean?” (EPA-HQ-OAR-2009-0923-3239-1)

Comment:

“I have watched for 40 years as our planet has become a dangerous place for anyone - human or otherwise - to live. Will we allow the earth to become uninhabitable? Or will we put laws in place to measure and control pollution? I certainly hope, for the sake of the next generations, that we get act responsibly to put clean energy solutions in place.” (EPA-HQ-OAR-2009-0923-3240-1)

Comment:

“We need to treat the oil and gas industry like we do the manufacturing industry. Every business should be accountable for their pollution emissions.” (EPA-HQ-OAR-2009-0923-3241-1)

Comment:

“oil companies have run this country for much too long. rein them in.” (EPA-HQ-OAR-2009-0923-3242-1)

Comment:

“Let's have no more cozy dealings/look the other way dealings. Make strong regulations and see to it they are carried out to the full. We have had enough of Foxes in the Hen House under Bush. It may cost jobs and financial pain in the oil and gas industry and to all who depend on it but there is a whole rest of the us and all of our futures that are at stake here.” (EPA-HQ-OAR-2009-0923-3243-1)

Comment:

“GET OFF YOUR ASS AND DO YOUR JOB. SO FAR YOU'VE BEEN INEPT ON EVERY FRONT.” (EPA-HQ-OAR-2009-0923-3244-1)

Comment:

“The damage done to the environment will have long term negative effects on plants and animals alike and this in turn will effect the health and natural as well as economic well being of more people than I can imagine. One industry does not have the right to do this. For all our sakes - both human and nonhuman, turn this industry into a responsible one!” (EPA-HQ-OAR-2009-0923-3246-1)

Comment:

“How much disaster does it take to make Congress wake up? is there so much hubris and impunity, that fore stalling actions now reveals the total lack of interest in the future? the answer is a resounding YES!!!! congress is nothing but a mere configuration of icons. an established group of talking heads, with nothing more important fort hem then continued investment in the egregious capitalization of the earth, for their own greed and self-interest. Congress cares little about the future, for it cannot see passed it's own INCOME!!” (EPA-HQ-OAR-2009-0923-3247-1)

Comment:

“It is about time (actually past time) we get off of the fossil fuel kick - - that, plus nuclear. Eliminate the tremendous subsidies and taxbreaks that the oil barons and their lobbyists have bought and paid for and develop clean energy like solar, wind and tidal. We can do without petroleum - - even to the elimination of many plastic products which only pile up in landfills until the end of time.” (EPA-HQ-OAR-2009-0923-3248-1)

Comment:

“It is time to hold the oil and gas industry accountable. We, as consumers, must do our part, as well, but we have a right to transparency from the companies that deliver the gas and oil we consume. I urge you to push our country in the direction of reducing substantially greenhouse gas emissions, starting with the largest polluters.” (EPA-HQ-OAR-2009-0923-3249-1)

Comment:

“OIL AND GAS INDUSTRY MUST BE HELD ACCOUNTABLE. The American public's best interests must be protected. We must not be manipulated by LOBBYING EFFORTS of the oil

and gas industry. There must be requirements for detailed direct pollution measurements. We must not continue the lax policies of the Bush Administration.” (EPA-HQ-OAR-2009-0923-3251-1)

Comment:

“From news reports that I have heard in last few days it is apparent that this disaster could have been avoided if regulations were in place and inspections carried out to insure that no company or individuals were in violation of pollution regulations. It is obvious that our country needs environmental protection on it's land and the waters that surround it.” (EPA-HQ-OAR-2009-0923-3252-2)

Comment:

“It is the job of agencies like yours to protect the people of this country. I count on you.” (EPA-HQ-OAR-2009-0923-3258-1)

Comment:

“I live in a state with two senators who do not represent my opinions or concerns well. So I write to you directly hoping that the EPA can do the best it can with the mandates it is able to enforce.” (EPA-HQ-OAR-2009-0923-3259-1)

Comment:

“Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3260-1)

Comment:

“It is inconceivable that the EPA would allow any more secrecy or special deals to be granted to the oil and gas industry. The very least the EPA can do is protect the public's right to know about the global warming pollution being emitted by the industry.

The oil and gas industry has successfully pushed to delay protective EPA action. Please no more delays!” (EPA-HQ-OAR-2009-0923-3262-1)

Comment:

“In this time of critical global issues, EVERYONE MUST BE ACCOUNTABLE. This is especially true for large corporations/businesses that impact world populations.” (EPA-HQ-OAR-2009-0923-3263-1)

Comment:

“In order to protect our planet, we citizens must have the information the fossil fuel wants to hide.” (EPA-HQ-OAR-2009-0923-3264-2)

Comment:

“I have just watched my daughter graduate from Southwest High School here in Minneapolis, MN. and as I watched her cross the stage to receive her diploma I didn't know whether to feel hopeful or pessimistic about her future. I DO believe that your actions in the EPA can make a difference in her quality of life. I urge you to require the oil and gas industry to be accountable for their share of the pollution of our air and water, and that you require them to disclose their emissions data. It is a good step in the direction of responsibility and accountability---the same qualities I ask of my graduating daughter.” (EPA-HQ-OAR-2009-0923-3266-1)

Comment:

“As an Alaska resident, I am particularly concerned about the impact of global warming, caused by pollution.” (EPA-HQ-OAR-2009-0923-3267-1)

Comment:

“It is vital that we have transparency in all government data, especially pollution. The government cannot pick winners and losers in energy production, it can provide data the help the market to do so. Fossil fuels need to be history. The Rocky Mountain Institute is already pushing the Reinventing fire program and the EDF has been pushing for a cap and trade system. We need this data to help support those efforts and to send a strong signal to consumers and producers about the impact of these externalities. In the long run this will help the us to build a strong economy based on renewables that increases wealth and national security.” (EPA-HQ-OAR-2009-0923-3268-1)

Comment:

“I hope you will finalize rigorous comprehensive requirements for the oil and gas industry to fully disclose its global warming pollution. These industries should not be exempted when other industries must report their emissions. Policy makers need this information to make good decisions when addressing global warming, and the public has a right to know who the largest

emitters of pollution are. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.” (EPA-HQ-OAR-2009-0923-3269-1)

Comment:

“To do less than this is to give our ecology, our safety and our lives over to the oil industry. As the accident in the Gulf and the oil industries responses, show, that would be disastrous” (EPA-HQ-OAR-2009-0923-3272-1)

Comment:

“This must be the first step in eliminating fossil fuel use and production, as we rapidly transition to clean renewable energy. RAPIDLY TRANSITION! As if life depended on it. (Life depends on it!)” (EPA-HQ-OAR-2009-0923-3275-1)

Comment:

“Large emission sources should report global warming emissions. As a former Air Quality Manager at Hamilton County Environmental Services, those reports would not be burdensome. As a matter of fact, Duke Energy was reporting CO2 emissions to our Agency voluntarily. An account of large emission sources will make it easier to prepare control strategies by USEPA AND industry. I believe you will find many utilities in favor of addressing global warming now.” (EPA-HQ-OAR-2009-0923-3277-1)

Comment:

“We are sick and tired of the oil and gas industry controlling our environment through intimidation and destructive tactics. You must find a way to control their greed and stop the destruction. They destroy our property and the oceans as well. They are responsible for more environmental destruction than any other business on the earth.” (EPA-HQ-OAR-2009-0923-3279-1)

Comment:

“Without strong protective agencies in our government and a congress that doesn't limit your abilities and deregulate business, we have no chance of solving the environmental problems that we face. Work for the American people, not big business, we pay your salaries just so you will protect us and our environment.” (EPA-HQ-OAR-2009-0923-3280-1)

Comment:

“Oil industry spills have too often contaminated our environment. It needs to be recognized and quantified.” (EPA-HQ-OAR-2009-0923-3281-1)

Comment:

“Evaluating the real environmental impact of the oil and gas industry cannot be done in patchwork. I encourage you to track all pollutants and include them in all impact reports prior to permitting every project. Understanding the real impact and the accumulative impact of every project is essential to making the right decision to permit” (EPA-HQ-OAR-2009-0923-3282-1)

Comment:

“I must say, strong , fair across the board regulation is the only way to protect ecosystems and local economies like the shrimpers and fishers of the gulf, not to mention the tourist industry. These companies cannot be trusted to do it on their own, profit motives apparently dictate that costs are cut at the expense of safety. Please get tough, hold BP and other oil and mining companies accountable!!” (EPA-HQ-OAR-2009-0923-3283-1)

Comment:

“If you do a mess, you have to clean it up, every child knows this!!!Why do big company don't have to take responsibility?” (EPA-HQ-OAR-2009-0923-3284-1)

Comment:

“Given current events in the Gulf and the catastrophic pollution that continues without respite, it should be clear to all concerned that protection is needed for the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3286-1)

Comment:

“It is critical that *everything* possible be done *right now* to rein in every threat to the quality of human (and other) life on this planet, now and for the times our children and grandchildren will have to live in. We have a staggering responsibility, especially in the face of all the ignorance, wrong-headedness and abuse our kind have visited upon OUR KIND! One of these responsibilities is to *ourselves*--that we know, understand and can act upon the truth.” (EPA-HQ-OAR-2009-0923-3287-1)

Comment:

“The solution for this type of problem is proper management of the oil companies before they do anything despite claims of higher retail prices.” (EPA-HQ-OAR-2009-0923-3288-1)

Comment:

“The industry makes billions of dollars in profits. They should be held responsible for their pollution. Enough is enough.” (EPA-HQ-OAR-2009-0923-3289-1)

Comment:

“With most Fed. Regulations they are min. standards. With out measuring the damage done by big oil and coporations how could anyone address this problem? If it were not so trajic it would be funny watching the Republicans who don't believe in regulations, big govt., but do believe in "drill baby drill" now all of a sudden scream about the lack of govt. oversight. There is no limit to hypocracy... there is pro-active and then re-active... we see what happens when the govt. is "reactive" to these big corporations.” (EPA-HQ-OAR-2009-0923-3290-1)

Comment:

“Industry has controlled our enviornmental policies much too long.” (EPA-HQ-OAR-2009-0923-3291-1)

Comment:

“please we are all so smarter than to allow the oil industry to do whatever it wants because they thjink they are doing us a big favor with their dirty dangerous oil rigs. we dont have to kiss big oils rear end . lets be wise about energy, america is not stupid . we know there is better energy alternatives.tht private sector, big business, corporations and the government need to unite together to defeat the global warming demon that confronts the earth . there is no time for business as usual, no time for politics as usual. the economy and the health of the earth must go hand in hand .big profit before earths good health must stop now . greed must stopnow. or our generation will be held accountable for the destruction of the earth . god bless the earth , not the greedy oil companies.” (EPA-HQ-OAR-2009-0923-3292-1)

Comment:

“What follows below is what I'm supposed to send as a form e-mail. What I'm saying here is this: Put the freaking 'Scrubbers' back on all refinery stacks - NOW, AT ONCE, THIS MINUTE! The way Clinton was about to when Bush said he'd remove and Clinton's EPA Director quit. I was there in 1979 when Leon Hess could no longer get Iranian oil and put them on so as not to foul the air - he collected the natural gas that's a by-product of the refining process in the process. We

are so far passed this "Get together" approach, it's time just to stop killing children with this toxic waste...I even have a j-peg of what Amerada Hess looked like, an oil painting, that's what. Do it." (EPA-HQ-OAR-2009-0923-3295-1)

Comment:

“It is long overdue that the oil companies runs and ruins America and the government pays them to do so. The oil companies have billion dollar incomes and soak it to the American public by over charging and now ruined the American economy. They have to be held accountable.” (EPA-HQ-OAR-2009-0923-3296-1)

Comment:

“Goddammit , You got us in this Fuckin mess , YOU can get us the Fuck out, Now Goddammit Now!!!!!!” (EPA-HQ-OAR-2009-0923-3299-1)

Comment:

“I am writing to encourage you to take an important step in supporting President Obama's pledge of an administration that values openness and the free disclosure of important, non-classified information.” (EPA-HQ-OAR-2009-0923-3300-1)

Comment:

“With our rapidly dwindling o-zone layer, we cannot wait any long for regulation. And yet vital regulations have been delayed. This is unacceptable, because we are running low on time as it is. We must act now before it is too late. I urge you to establish comprehensive pollution disclosure requirements for large greenhouse gas emitters inthe oil and gas industry. For our children and our planet, please do so.” (EPA-HQ-OAR-2009-0923-3302-1)

Comment:

“Greenhouse gasses quite possibly pose the greatest man made environmental threat to this green Earth. There is no reason other than greed and power that would make the oil companies exempt from reporting of green house gasses. The time has come to make them stand with all others. Please include them in the reporting requirements.” (EPA-HQ-OAR-2009-0923-3303-1)

Comment:

“Don't let BP hide their massive polluting activities. Hold them accountable and make the information public!” (EPA-HQ-OAR-2009-0923-3304-1)

Comment:

“As a physician I am expected to document all my findings with a patient, including what examinations I conducted, which pertinent explorations I conducted or didn't, and why. This way there is accountability of anything goes wrong. This also keeps a doctor on his or her toes. This accountability is just as important in the industrial sector, especially with polluting industries that effect the health of our earth.” (EPA-HQ-OAR-2009-0923-3305-1)

Comment:

“The right time is now. NO MORE DELAYS PLEASE. Thank you.” (EPA-HQ-OAR-2009-0923-3306-1)

Comment:

“We must know what we are dealing with in order to assess and address our climate and energy problems.” (EPA-HQ-OAR-2009-0923-3307-1)

Comment:

“We must know what we are dealing with in order to assess and address our climate and energy problems.” (EPA-HQ-OAR-2009-0923-3308-1)

Comment:

“I live in New Orleans and am increasingly alarmed by the lack of information about carbon emissions by large corporations.” (EPA-HQ-OAR-2009-0923-3309-1)

Comment:

“I HEAR THAT THE AMERICAN PEOPLE MAY BE PICKING UP THE BILL FOR THE BP OIL DISASTER. THIS IS JUST STUPID AND CRAZY!

LAST YEAR THE INDUSTRY LOBBIED ITS WAY OUT OF THE MANDATORY GREENHOUSE GAS REPORTING RULE. THIS IS ALSO STUPID AND CRAZY.” (EPA-HQ-OAR-2009-0923-3310-1)

Comment:

“I would say that this would be the minimum. There should be an ongoing monitoring of the return of natural species to the affected areas. EXXON should be doing research to restore the 200 miles of dead Alaskan beaches to their former status. Just because there are no blobs of oil floating in the water doesn't mean that the area is cleaned up and made whole. America has to start thinking about American instead of the monopolistic multinational companies that have us in a stranglehold.” (EPA-HQ-OAR-2009-0923-3311-1)

Comment:

“For all of our sakes, especially our new grandson, please stop big oil from ruining our precious earth.” (EPA-HQ-OAR-2009-0923-3312-1)

Comment:

“FULL DISCLOSURE BY OIL & GAS COMPANIES IS AN ABSOLUTE MUST. PLEASE ENSURE THEY COMPLY. THANK YOU.” (EPA-HQ-OAR-2009-0923-3313-1)

Comment:

“The exemptions and subsidies for fossil fuel producers must stop. We need to promote the development of clean energy alternatives. The oil and coal and gas industry will continue to mine and drill as long as they can make a profit. We need to make it too expensive for them to produce so that alternative fuels will be developed and used. Only then can the EPA do its job and protect our environment.” (EPA-HQ-OAR-2009-0923-3314-1)

Comment:

“Please make sure the public is informed about pollution associated with the danger of global warming by a lot of facilities in the oil and gas industry.

We need your leadership to enforce disclosure of information these facilities have not made available or may not even gather what we need is comprehensive, quantified assessments of emissions, not just estimates (an example is the seeming reluctance of BP to accurately assess the number of barrels/day of crude oil their out-of-control well is currently producing)..

I appreciate your leadership in reducing harmful air pollution Thank you.” (EPA-HQ-OAR-2009-0923-3315-2)

Comment:

“History records the names oh heroes who protect public health. I urge you to add yours to this honorable roster.” (EPA-HQ-OAR-2009-0923-3316-1)

Comment:

“Lets do this while we can still breathe the air. 1/2d” (EPA-HQ-OAR-2009-0923-3317-1)

Comment:

“Lisa Murkowski is a total IDIOT from a long line of IDIOTS but she and her daddy have a lot of BIG OIL MONEY in their bank accounts in some island somewhere. Even though Don Young says he isn't going to support her on this one all the Alaska politicians are crooks. She stood there yesterday in Washington with her oil buddies they looked like the 9 STOGIES! Having 40 votes with 3 of them Sen Mary Landrieu of LOUISIANA,(if they don't vote her out I'll never understand) Blanche Lincoln of Arkansas, and Ben Nelson of Nebraska and needing 51 votes begging for a hand out! I think I will stick with what Lisa Jackson had to say yesterday!” (EPA-HQ-OAR-2009-0923-3318-1)

Comment:

“Please help we want this madness to end ... now.

I thank you for your anticipated cooperation.” (EPA-HQ-OAR-2009-0923-3319-1)

Comment:

“And please require that every new and existing underwater drilling rig put in place an emergency relief well, like they do in Canada.” (EPA-HQ-OAR-2009-0923-3320-1)

Comment:

“We must not allow this to happen this time.

The BP disaster may provide a path out.” (EPA-HQ-OAR-2009-0923-3321-1)

Comment:

“Seize this opportunity to ensure that the system uses rigorous, detailed, direct pollution measurements and that the industry's emissions are included in the reporting system from day one.” (EPA-HQ-OAR-2009-0923-3321-2)

Comment:

“The Deep Horizon disaster has taught us plainly that polluters must disclose full details of their work. You have finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action.” (EPA-HQ-OAR-2009-0923-3322-1)

Comment:

“As a father, grandfather, and elementary school principal, I have long supported measures to protect and preserve our environment and its varied and valuable natural resources, not the least of which is the air we breathe. Today I am writing you to ask that you please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3324-1)

Comment:

“We owe it to our children and grandchildren.” (EPA-HQ-OAR-2009-0923-3325-1)

Comment:

“if it shows nothing else, the Deepwater Horizon disaster shows that there are no easy ways to seal an oil well at this depth, and all the information released so far show that BP was flat out lying when it told MMS that there was a disaster response already planned out and ready to go. it also shows how irresponsible the industry and the government have been in advancing new methods to deal with type of event. thirty some years ago the exact same thing happened in Mexico, but in only 200 feet of water, and it took many months to plug that well. the technology used now is exactly the same as it was thirty years ago. nothing new in thirty years.

they have the same kind of track record on air pollution/global warming, no research, despite billions and billions of dollar's in record profits. all they are doing is spinning the lie that BP is a green corporation in a green industry. nothing could farther from the truth this year, the EPA is proposing to set things right and finally include the offshore - and onshore - oil and gas industry in the system.” (EPA-HQ-OAR-2009-0923-3326-1)

Comment:

“The environment must be protected and the laws and rules must be tightly enforced, regardless of what companies and their lobbyists might argue. Please make a FIRM stand in defending all the life and resources that are now being so negatively affected. I appreciate your work on the behalf of the often fragile environment. Thank you!!” (EPA-HQ-OAR-2009-0923-3327-1)

Comment:

“Every corporation must adhere to clean air, water, soil standards to protect our health and environment.” (EPA-HQ-OAR-2009-0923-3328-1)

Comment:

“I THANK YOU FOR KEEPING OUR EARTH STRONG AND STRENGTHENING IT NOT ONLY FOR OURSELVES BUT FOR OUR GRANDCHILDREN,GREAT-GRANDCHILDREN...TOO. YOUR OWN GRANDCHILDREN WILL BE PROUD OF YOU AND GRATEFUL. I AM GLAD YOU FINALLY SEE WHAT'S IMPORTANT.” (EPA-HQ-OAR-2009-0923-3329-1)

Comment:

“For some time, I have been concerned that oil and gas corporations operating in the United States have had too much influence and not enough accountability with respect to their environmental impacts in a wide variety of environments.” (EPA-HQ-OAR-2009-0923-3330-1)

Comment:

“We need to do this right to keep our planet as healthy as possible, and it needs to start right now, not ten years hence. The oil and gas industries have been in charge, refusing to be accountable. But now there really is no choice in the matter, is there?” (EPA-HQ-OAR-2009-0923-3331-1)

Comment:

“Save all that God has created, and force huge oil and gas facilities to put a stop to the old mindset of profit's before our earth and all it's inhabitant's! The time is now to save our earth, or it will not be fit for any living thing! Thank you, and God Bless You(0)” (EPA-HQ-OAR-2009-0923-3332-1)

Comment:

“Come on! Seriously? Obama was supposed to be an agent of change? Why is all we see more of the same, just in the body of a nicer guy?” (EPA-HQ-OAR-2009-0923-3333-1)

Comment:

“My first reaction to this is WHY wouldn't an American company NOT want to disclose their pollution data? Why would ANY American company who cares for this country and it's people want to continue to throw pollutants into our air, soil and water? Is making money more important to you than a safe, clean environment? How will you feel when we have to go buy oxygen to breath like we do when buying bottled water. ALL the signs are there yet the big polluters continue to pretend that nothing is happening or is wrong. IT IS WRONG NOT to address pollution! IT IS WRONG to allow the pollution of the ONLY home we humans and thousands of diversified other life forms have to exist! I will support ANY effort to turn these issues into something in the PAST and to move forward in a safe way to ensure our survival and that of our future generations.” (EPA-HQ-OAR-2009-0923-3334-1)

Comment:

“Please inform us of the harm the oil and gas industry is doing to this planet. The oceans are dieing and we are doing it plus the clean air act needs to be passed so that we can work on cleaning up this dirty planet. I don't care about the bottom line and if you were any decent human beings so would you. We all live on this planet and you should answer to the people of this country and not answer to big dirty oil, and their lobbyists.” (EPA-HQ-OAR-2009-0923-3335-1)

Comment:

“Let's rule out offshore drilling. All the oil in the gulf is enough to keep the power on for 2 minutes in Texas!” (EPA-HQ-OAR-2009-0923-3336-1)

Comment:

“I also believe that drilling for oil in the ocean should be severely limited with strong, firm regulations and scrupulously monitored by the government.” (EPA-HQ-OAR-2009-0923-3337-1)

Comment:

“All oil wells offshore should be shut down, particularly the ones BP owns. OSHA had over 800 serious problems against BP, and only against the next violator. And we let them drill without studies and inspections! Let's get back on track. If you think for a moment that Salazar is not in the oil companies beds, you are mistaken. Let's put areal conservationist in charge of Interior.” (EPA-HQ-OAR-2009-0923-3338-1)

Comment:

“Yes, I know we need the oil. I drive a gasoline-burning car. But if we're going to drill for oil we need it done right.” (EPA-HQ-OAR-2009-0923-3339-1)

Comment:

“BP's actions in the Gulf simply typify how the oil and gas industry operates. That industry MUST be held accountable. EPA proposes to include oil and gas in its mandatory greenhouse gas reporting rule, a rule that would have tracked the industry's global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-3340-1)

Comment:

“Please, let anyone, especially those that live and worked in Louisiana, volunteer to clean up the beaches. EVEN BETTER, BP SHOULD PAY AND INSURE THEM AGAINST ANY HAZARDS, THAT THEY HAVE CREATED!

BP HAVE CREATED THIS CATASTROPHE ... BY THEIR, BP'S RECKLESS NEGLIENCE & GREED FOR PROFITS!

BP'S PRIORITIES OF RECKLESS NEGLIENCE AND GREED FOR PROFITS ARE THE ONLY GOALS THAT BP TAKES SERIOUSLY!

THESE BP'S PRIORITIES HAVE TAKEN PREFERENCE OVER THE VERY LIVES OF THEIR WORKERS, and, our Oceans, our Gulf, Our Beaches, ESTUARIES, AND, breeding areas Our Birds and Our Fish.

The damage that they have done is incalculable!

Please support EPA the public and it needs to take on the oil and gas industry!

Accountability is Essential!” (EPA-HQ-OAR-2009-0923-3342-1)

Comment:

“The oil and gas industry, indeed almost all large corporations, want us to pay. For their mistakes. For their costs. They want to keep the profits for themselves. Private. But they want to socialize the costs. They want us to pay. And pay. And pay.

No. No. No. NO. NO!” (EPA-HQ-OAR-2009-0923-3343-1)

Comment:

“It is time for fairness to prevail. If a company pollutes, please hold them responsible. Thank you!” (EPA-HQ-OAR-2009-0923-3344-1)

Comment:

“The BP Cataclysmic disaster is just of Taste of More to Come if we do not implement Strong and Decisive regulations and Safeguards. As it stands now, we and nature will be affected by this disaster for generations to come and with the Exxon Valdez spill where the factions of the environment after 21yrs as not at all recovered. Recent studies have indicated that thousands of gallons of oil still remain from the Valdez spill.” (EPA-HQ-OAR-2009-0923-3346-1)

Comment:

“Last year the oil and gas industry reportedly lobbied its way out of the mandatory greenhouse gas reporting rule, which would have tracked its massive global warming pollution emissions.” (EPA-HQ-OAR-2009-0923-3347-1)

Comment:

“We must take action now or we will not have a future to protect!” (EPA-HQ-OAR-2009-0923-3348-1)

Comment:

“THIS SHOULD BE PUBLIC RECORD, NOT HIDDEN...” (EPA-HQ-OAR-2009-0923-3349-1)

Comment:

“As a citizen, I would like to know what what global w warming pollutants companies are emitting. In lishth of the recent oil spill in the guld, it seems even more urgent to do so. Therefore, I write asking you to please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3350-1)

Comment:

“YOU ARE IN A POSITION TO DETERMINE THE FUTURE. IT IS PLAIN THAT A CLEAN ENVIRONMENT AND CONTROL OF THE EXTENT OF GLOBAL WARMING FOR FUTURE GENERATIONS IS IMPERILED.” (EPA-HQ-OAR-2009-0923-3351-1)

Comment:

“REGULATION OF THESE SOURCES OF POLLUTION IS LONG OVERDUE.” (EPA-HQ-OAR-2009-0923-3351-2)

Comment:

“I’m responsible for my actions, why should ANY facility be held to a different standard?” (EPA-HQ-OAR-2009-0923-3352-1)

Comment:

“This idea from the Environmental Defense Fund sounds pretty good: require the emitters to disclose their data. This is good for the public, good for science, and good for industry as well (so that each emitter can see what the others are doing, and maybe learn from them).” (EPA-HQ-OAR-2009-0923-3353-1)

Comment:

“Time is working against our environment, and us, as a result of past actions. Help ensure that democracy works more effectively.” (EPA-HQ-OAR-2009-0923-3354-1)

Comment:

“I understand the EPA has finalized global warming pollution disclosure requirements for other big emitters, but the oil and gas industry has successfully pushed to delay protective EPA action.” (EPA-HQ-OAR-2009-0923-3355-1)

Comment:

“I appreciate your agency's work in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.” (EPA-HQ-OAR-2009-0923-3355-2)

Comment:

“Don't give Obama the answer to his inquiry as to who's ass to kick.” (EPA-HQ-OAR-2009-0923-3356-1)

Comment:

“I THINK IT IS AN AFFRONT TO GOD AND AN INSULT TO MOST PEOPLE'S CONCERNS TO CONCEAL OR RESTRICT INFORMATION LIKE THIS!” (EPA-HQ-OAR-2009-0923-3357-1)

Comment:

“We have known that we are destroying the earth, our only home in the universe, for over 50 years. We can not wait any longer to relieve the pressure on our environment. We have an historic opportunity to cap global warming pollution, create jobs rebuilding our seriously aging energy infrastructure and put people back to work unleashing America's green energy economy.” (EPA-HQ-OAR-2009-0923-3358-1)

Comment:

“I have 2 grandsons and 2 more grandchildren on the way. I want them to grow up breathing air that will allow them to develop to their fullest potential. How can we know where to begin to slow climate change unless we know where and how much the problems we face are emitting. I want my grandchildren, when they have grand children, to be able to watch them grow up breathing clean, fresh, toxin-free air.” (EPA-HQ-OAR-2009-0923-3359-1)

Comment:

“AND DISCLOSE ALL THE POISONS IN OUR AIR AND WATER.” (EPA-HQ-OAR-2009-0923-3360-1)

Comment:

“This is particularly important here in Corpus Christi where the Las Brisas Energy Corporation wants to build a toxic waste incinerator to generate electricity. We need the help of the EPA as the TCEQ has been captive to the industry it is supposed to regulate.” (EPA-HQ-OAR-2009-0923-3361-1)

Comment:

“Candidate Obama promised that, if elected, his administration would be marked by transparency and accountability. Sadly, that has not always been the case to date, since many of the Bush secrecy policies are still in place. However, I applaud your proposal to require polluters to disclose their emissions data.

Please continue to protect the public's right to know about the global warming pollution being emitted by thousands of facilities by extending the requirements for disclosure to the oil and gas

industry which thus far has successfully pushed to delay protective EPA action.” (EPA-HQ-OAR-2009-0923-3362-1)

Comment:

“We now stand at a point where there is no time left to waste. We have inflicted devastating harm to the environment around us with lack of awareness and proper planning. We have a massive responsibility to do everything we can in the present to ensure a brighter future for our children and the world around them. "And when the opposition said this just wasn't the right time, you didn't want to wait another year, or another decade, or another generation for reform. You felt the fierce urgency of now."-President Barack Obama, March 23, 2010” (EPA-HQ-OAR-2009-0923-3363-1)

Comment:

“I totally agree with these statements, with an added note from this sender. Only total transparency will actually allow our government to know what we are dealing with in evaluating the US contributions in spewing greenhouse gases into our atmospheres. The US has drug it feet FAR to long. Europe and other countries have taken active stances and are way ahead of us in developing alternate energy sources. If we don't change our ways now, our future economy is at great risk. Our addiction to fossil fuels will be our downfall. This huge negative impact of our stubborn ways and greed of the huge corporations that produce our polluting energy grid will be our downfall. Huge corporations and their powerful lobbyists have controlled our government for too long and it has to stop. This action would be a big step in starting to loosen the control that huge corporations have over our government. The US lags FAR behind much of the rest of the world in even making attempts to control our greenhouse gases. The reason???? Powerful gas and oil companies. They have a stranglehold on us. Thank you for listening, Sincerely, Jan Hegner” (EPA-HQ-OAR-2009-0923-3364-1)

Comment:

“I WOULD LIKE TO KNOW WHY WE DIDNT ENLIST THE NAVY THAT IRRESPONSIBLY SONARS MAMMALS BRAINS OUT..WHY CANT THEY USE IT RESPONSIBLY NOW TO KEP OTHERS FROM ENTERING THE OIL SPILL AREA? GOOD IDEA. PLEASE ASK.” (EPA-HQ-OAR-2009-0923-3365-1)

Comment:

“If they weren't doing something wrong, they wouldn't be concerned. Obviously, they have a lot to hide. Please don't allow them to do so.” (EPA-HQ-OAR-2009-0923-3366-1)

Comment:

“With all that has happened this week with both oil and gas disasters, we need strong leadership from the EPA and all government agencies more than ever.

These mega-corporations who treat our planet so cavalierly must be held to account. Their obscene profits should be used to clean up their depredations before distribution to their shareholders and top management.

Disclosure of emissions is but one step. Don't let these clean air thieves stop you from taking it.” (EPA-HQ-OAR-2009-0923-3367-1)

Comment:

“Both we and future generations need your help!!! Please provide it!!” (EPA-HQ-OAR-2009-0923-3368-1)

Comment:

“When will you all stop protecting big dirty polluting businesses?” (EPA-HQ-OAR-2009-0923-3369-1)

Comment:

“Hey, everyone, including the EPA needs facts to make informed decisions.

Please do your part.” (EPA-HQ-OAR-2009-0923-3370-1)

Comment:

“Your agency needs to be able to act on this and other matters without going through Congress, with just the President signing off! If there is a way that I can help make this possible, please let me know.” (EPA-HQ-OAR-2009-0923-3371-1)

Comment:

“This industry has been responsible for the greatest amount of carbon emissions.” (EPA-HQ-OAR-2009-0923-3372-1)

Comment:

“Don't become another BP and their oil spill catastrophe.” (EPA-HQ-OAR-2009-0923-3373-1)

Comment:

“Part of the EPA's job is to protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. Please be sure this is done.” (EPA-HQ-OAR-2009-0923-3374-1)

Comment:

“Full disclosure of the global warming pollution emitted by the oil and gas sector is important and essential.” (EPA-HQ-OAR-2009-0923-3374-2)

Comment:

“It is long past the time that we stop deluding ourselves about the devastating effects of unleashing tons of chemicals into the air. These chemicals either cause or are significant contributors to the increasing cancer pandemic. The best way to cure cancer is to prevent it. American citizens have a right to know what these industries are doing to our health. BP just recently announced that they have been pouring tons of chemicals into the air in Texas. You would think that BP with all its media hype would have some awareness of their mess, but no, it's business as usual. Profits before life!” (EPA-HQ-OAR-2009-0923-3375-1)

Comment:

“For God's sake, do something right for our Citizens for a change!” (EPA-HQ-OAR-2009-0923-3376-1)

Comment:

“We need to change the way we do this stuff! We need to make doing the right thing beneficial for the corporations and the people, and the planet. Measuring and disclosing is one of those steps towards transparency and information.” (EPA-HQ-OAR-2009-0923-3377-1)

Comment:

“If we are to lower the health care costs and hence the federal deficit we must have this information to protect our health. Polluter must not continue to be allowed to outsource their costs to our bodies.” (EPA-HQ-OAR-2009-0923-3378-1)

Comment:

“In the past you have provided leadership in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.

Our nation requires assertive leadership for the disclosure of global warming pollution emitted by the oil and gas sector.” (EPA-HQ-OAR-2009-0923-3379-1)

Comment:

“I urge you to assure the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3379-2)

Comment:

“As a supporter of the Environmental Defense Fund and an environmental attorney, I am asking you to please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3380-1)

Comment:

“Both environmentally and politically the new disclosure requirements are essential. The environmental community wants to support the President; we need more reasons to do so.” (EPA-HQ-OAR-2009-0923-3381-1)

Comment:

“Please do what you know is right while you still can!” (EPA-HQ-OAR-2009-0923-3382-1)

Comment:

“It's also time to stop playing BP's games and make the company take responsibility for the pattern of reckless behavior that led to the growing Deepwater Horizon disaster in the gulf.

The Environmental Protection Agency has the authority to bar BP from receiving U.S. government contracts. Suspension of BP contracts would mean the loss of billions of dollars and effectively stop the company from drilling in federally controlled oil fields both on and offshore.

Please impose "discretionary debarment" and strip BP of all federal contracts.

We again need your strong leadership in ensuring full disclosure of the global warming pollution

emitted by the oil and gas sector and in stopping BP from committing further reckless behavior.” (EPA-HQ-OAR-2009-0923-3383-1)

Comment:

“P.S. Now more than ever, after seeing the oil spill in the Gulf of Mexico, WE NEED STRONG CONTROLS OVER THE GAS AND OIL COMPANIES. Please fight to keep our air and our waters clean from pollution.” (EPA-HQ-OAR-2009-0923-3384-1)

Comment:

“Our country and its people are being slowly poisoned by polluters who are raking in profits with basically no one making them accept liability for their actions. They have deep pockets and can "buy" their way out of any problems. They need to be monitored by someone who cannot and will not be swayed by money or favors.” (EPA-HQ-OAR-2009-0923-3385-1)

Comment:

“Please go ahead with efforts to establish comprehensive pollution disclosure requirements for large greenhouse gas emitters in the oil and gas industry.

Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.” (EPA-HQ-OAR-2009-0923-3387-1)

Comment:

“U. S. invaders out of Afghanistan, Colombia, Cuba, Germany, Guatemala, Guam, Iraq, Haiti, Japan, Kyrgyzstan, Korea, Pakistan and Puerto Rico, among more than a thousand "bases"!

Hands off Iran!

Fight terrorism! Disarm the Pentagon and dissolve the CIA!” (EPA-HQ-OAR-2009-0923-3388-1)

Comment:

“It is important for the economy of Texas and the nation to curtail the threat of global climate change. Texas will suffer from stronger hurricanes and less rain fall.” (EPA-HQ-OAR-2009-0923-3389-1)

Comment:

“I beg of you to take us down the right path, lead us by example, admonish when necessary, always avoid prevarication, and join together in veracity; "before the dark powers of destruction unleashed by science engulf all humanity in planned or accidental self-destruction."” (EPA-HQ-OAR-2009-0923-3390-1)

Comment:

“After working harder for any campaign than I've ever worked, I was thrilled to see President Obama elected and though still a supporter, I don't think you all are fighting big corporations hard enough. I'm counting on you, Lisa Jackson, to stand up and make corporations accountable for their pollution.

There has in essence been no EPA for years-now come out swinging to help save the earth and its peoples and flora and fauna.

Call for transparency from the oil and gas industry, please.” (EPA-HQ-OAR-2009-0923-3391-1)

Comment:

“Don't let this happen. It is EPA's responsibility to lower the hammer on these environmental criminals! Thank you.” (EPA-HQ-OAR-2009-0923-3392-1)

Comment:

“Much of this e-mail was written for me, by the Environmental Defence Fund, and I add my name to it. But first I add my personal statement. Yes, I was raised by an outdoors family, camping and hiking regularly. I grew up to be a "nature loving hippie" (my words, I'm proud to be one). But I'm also a student of environmental sciences and geosciences. My humanist optimism gives me faith, but when I review the data, when I sit in lectures and attend conferences, sometimes I get terribly frightened. Strong action must come now, because the one and only thing keeping humanity from growing and prospering cleanly is the greed of the corporations already entrenched in their polluting trades. Democracy can win through, I believe. All theorists make this point clear though- the dissenters like Hobbes and the champions like Dahl without an educated public democracy is useless and little more than mob rule. The public need to be not only in control, but informed.” (EPA-HQ-OAR-2009-0923-3393-1)

Comment:

“This isn't about a warming planet, it's about ocean acidification, the complete destruction of massive forests, the disappearance of habitable and arable land... Greenhouse gases do so much more than warm, and without this action now, we risk the single greatest extinction event of the

planet's history happening here and now.

Or we can stop it.” (EPA-HQ-OAR-2009-0923-3393-2)

Comment:

“The average person never gets to see the undisclosed pollutin and environmental damage done by these companies. When we are able toget truthfu and completel information it will make it easier to get politicians to act responsibly.” (EPA-HQ-OAR-2009-0923-3394-1)

Comment:

“When secrecy trumps full disclosure,it is doubtless of benefit to the polluting industries-it is the restof the planet that pays the price.” (EPA-HQ-OAR-2009-0923-3395-1)

Comment:

“Please. No more 'private meetings' such as had been the choice of the last previous administration. It has been tried and the outcome is deplorable.” (EPA-HQ-OAR-2009-0923-3395-2)

Comment:

“EPA has correctly and rightly finalized global warming pollution disclosure requirements for many big emitters. This is a necessary precedent just to gather basic information for climate change and our transition to catch up with other countries on clean energy.Unfortunately, the oil and gas industry has successfully pushed to delay protective EPA action.” (EPA-HQ-OAR-2009-0923-3396-1)

Comment:

“The public has a basic human and legal right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. Please protect that right!” (EPA-HQ-OAR-2009-0923-3397-1)

Comment:

“Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data - i.e., the truth - and not obviously self-interested industry estimates.” (EPA-HQ-OAR-2009-0923-3397-2)

Comment:

“Full disclosure of the global warming pollution emitted by oil and gas facilities is critical to effective public policy action and accountability by providing essential information to policymakers and holding large emitters accountable for their emissions.

Such clear policy is important in reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.” (EPA-HQ-OAR-2009-0923-3398-1)

Comment:

“You should also be required to contribute to a Health Care Superfund to pay for all the people who will get sick as a result of your polluting the water, air and food supply.” (EPA-HQ-OAR-2009-0923-3400-1)

Comment:

“The United States needs to become a LEADER in environmental responsibility. No more bowing to big oil companies and the like. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3401-1)

Comment:

“Some people believe human-caused global warming exists and others do not.

One thing is certain. Countless facilities run by the oil and gas corporations definitely emit air pollution that kills people.

EPA has finalized air pollution disclosure requirements that most corporations must comply with. The oil and gas corporations know the disclosure requirements will reduce their profits a little. I don't know how it happened, but corporate oil has convinced EPA management to delay the implementation of these regulations.

I am aware that large corporations control America. There's a point when they overstep their bounds. This is one of them.

Please start enforcing these important regulations ASAP.

The health of American citizens depends on it.” (EPA-HQ-OAR-2009-0923-3402-1)

Comment:

“There is a reason why the previous administration sought to minimize scientific involvement with decisions—we are paying the price with the recent Gulf of Mexico oil spill!” (EPA-HQ-OAR-2009-0923-3403-1)

Comment:

“We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.” (EPA-HQ-OAR-2009-0923-3404-1)

Comment:

“I am grateful for the Obama administration's decision to make public much of the tragic destruction currently going on in the Gulf of Mexico as a result of BP's careless drilling. However, there is a great deal going on in the world that will eventually affect all of us. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3406-2)

Comment:

“How is it that the oil and gas industries have escaped having to disclose their global warming pollution when they are some of the biggest polluters???? PLEASE protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3407-1)

Comment:

“Thank you. The big tragedy in the gulf brings all this in focus. Big oil must begin right now being fully disclosed and totally regulated. If any of us had known that BP had no safety plan at all for digging so deep, they would not have had the opportunity to make such an attempt. It is outrageous! Please do everything possible to shine bright lights on oil and gas industries.” (EPA-HQ-OAR-2009-0923-3408-1)

Comment:

“It is the law to have labels with ingredients on packages so we know the contents. All Americans have the right to know what is in the air we are breathing. Pollution emitting companies owe the American people this information. Informed Americans will be able to make better decisions regarding our environment.” (EPA-HQ-OAR-2009-0923-3409-1)

Comment:

“By the way, what are you doing to keep us informed about METHANE? In 1988, Bill McKibben wrote about global warming in the New York Review of Books. In 2010, Bill McKibben says it may already be TOO LATE to stop the ruin of the planet through runaway heating caused by the release of methane from the melting tundra. You know the Triassic ended that way -- with methane released from methane hydrates by the warming from volcanic carbon dioxide.

We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.

Thank you.” (EPA-HQ-OAR-2009-0923-3411-2)

Comment:

“Climate change is a serious threat to the continued civilized existence of our children and grandchildren. Emissions of carbon dioxide, methane, and other greenhouse gases must be reduced substantially and quickly.” (EPA-HQ-OAR-2009-0923-3412-2)

Comment:

“You might like to know I worked for about a year in the laboratory led by Dr. C.D. Keeling, which was the lab that monitored the world's CO₂ for many years and they did very careful work in showing that the emission of CO₂ was having an adverse impact on the world's atmosphere. I was there 1977-1978 as a technician.” (EPA-HQ-OAR-2009-0923-3414-2)

Comment:

“There is really no more time to waste. How can we change our ways if we are not given the whole picture? There must be someone who is brave enough to stand up against these powerful corporations and demand that they change their ways so that our next generation can have a life that is full of beauty and diversity. A life that is sustainable. Please help.” (EPA-HQ-OAR-2009-0923-3415-2)

Comment:

“There is really no more time to waste. How can we change our ways if we are not given the whole picture? There must be someone who is brave enough to stand up against these powerful corporations and demand that they change their ways so that our next generation can have a life that is full of beauty and diversity. A life that is sustainable. Please help.” (EPA-HQ-OAR-2009-0923-3416-2)

Comment:

“We, the public, have a right to know about ALL pollution being emitted the oil and gas industry, including that associated with global warming. So, I ask you, the EPA, to implement, without further delay, the finalized global warming pollution disclosure requirements for ALL big emitters including the oil and gas industry which has successfully pushed to delay this EPA action.” (EPA-HQ-OAR-2009-0923-3418-2)

Comment:

“Without this type of disclosed information we, as the general public, can only speculate as to who to choose and who to boycott when making our daily product and life choices. Also the lack of this type of information has a potential of hurting the more environmentally conscientious corporations that try so hard to be good stewards. This disclosed information is important to the EPA and the world as it helps us help you to control and mend our environment. We would all actually like much broader disclosure requirements whether the EPA is allowed to enforce or not. We, as the general public, have considerable strengths that have the potential to sway large corporations to avoid health and environmental decimation in their pursuit of exorbitant profits. This is a "YES WE CAN" sort of thing.” (EPA-HQ-OAR-2009-0923-3419-1)

Comment:

“Every Newspaper should be required to have a weekly column laying out the actions of the EPA and the full exposure of the companies and their non-conformance to the laws. And the power to sue for redress by EPA.” (EPA-HQ-OAR-2009-0923-3420-1)

Comment:

“The letter below expresses exactly what I want to tell you.” (EPA-HQ-OAR-2009-0923-3421-1)

Comment:

“Their actions affect ALL of us and the rest of the world. That alone gives the public the right to know what in the heck we are breathing! The need to be transparent about what they are spewing out in the atmosphere!!!!” (EPA-HQ-OAR-2009-0923-3423-1)

Comment:

“We who watch the complicated "dance" between the EPA and our nation's equally determined industrial polluters commend you for your concerted efforts on behalf of our land and, to a

considerable extent, the future of humanity. PLEASE DO NOT LET THESE OIL-OBSESSED ENTITIES CONTROL WHAT IS NOT THEIRS TO CONTROL! You are the only real hedge against their continued defiance and destruction. Be assured that the nation overwhelmingly supports your stand, and insists on full disclosure as a mandate to those who defy it. Thank you and hold high your standards!" (EPA-HQ-OAR-2009-0923-3424-1)

Comment:

"We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates." (EPA-HQ-OAR-2009-0923-3425-1)

Comment:

"Thank you for the rule developed by your agency to protect the public's right to know how much global warming pollution is being emitted by thousands of facilities in the oil and gas industry." (EPA-HQ-OAR-2009-0923-3426-1)

Comment:

"Please put the public interest ahead of the oil and gas industry interests. I know it is politically and financially hard to withstand strong private pressure to override public interest. I saw that all the time when I served on my local Conservation Commission. One property owner armed with good engineers and lawyers could always make a strong case for his dream project against the more generalized, therefore more diffuse public interest in preserving all wetlands, including his.

Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry." (EPA-HQ-OAR-2009-0923-3427-1)

Comment:

"As a grandmother of three wonderful children, I am very concerned about the earth we leave behind for them. One positive way to protect our earth, our community is to know just what is being spewed into it by many of our industries. I do not want a repeat of what Superior tube company did for years and then find out our drinking water and bathing water is bad because of what they have done; so I am asking you to....." (EPA-HQ-OAR-2009-0923-3428-2)

Comment:

“Recent events with BP's catastrophic oil spill show us that we cannot trust oil companies to do the right thing for our citizens. Profit is a stronger motivator for some. I believe that the EPA should have more data to obtain a more complete understanding of all the emissions. I was a process chemist for a major chemical company for 32 years and we took EPA regulations seriously and complied. It was good for our safety on the job, our workers' health and the environment. Please help current companies, especially the oil and gas companies, to do the same.” (EPA-HQ-OAR-2009-0923-3429-1)

Comment:

“The BP Deepwater Horizon oil-rig disaster is a sad and stark reminder that oil is a dirty, dangerous, and deadly energy source that has no place in a 21st-century energy economy. I urge you to engage every resource available to address the immediate cleanup and recovery needs of Gulf Coast residents, businesses, wildlife, and marine life. I've had enough -- we need a commitment to end all new proposals for offshore oil drilling and permanently protect our coasts. Instead of risking our lives, our coasts, our clean air, and our security by perpetuating our addiction to oil, it's time to build a clean-energy economy that means more jobs, less pollution, and real energy independence.

Do everything you can to put voltaic solar panels on every roof in the US. This is enough energy for now and the future, including the supply for electric cars for everyone and all manufacturing plants. You can close down the heat creating power plants, eliminate the need for water cooling, reduce dangerous coal mining and substantially reduce global warming by reducing CO² emissions.

Sincerely,” (EPA-HQ-OAR-2009-0923-3430-1)

Comment:

“Please, make sure government is doing the job we taxpayers are paying for--enforcing the law--equally and fairly--and protecting the public.” (EPA-HQ-OAR-2009-0923-3431-1)

Comment:

“What more has to happen to our country before we wake up and have irreparable damage. I believe we already have it. Please hold the companies accountable.” (EPA-HQ-OAR-2009-0923-3432-1)

Comment:

“With this Big Oil Armageddon in the Gulf, the oil, gas and nuclear industries must account for everything they do...the Gulf disaster has shown the world that transparency, responsibility and accountability are absolutely essential.” (EPA-HQ-OAR-2009-0923-3433-1)

Comment:

“We're counting on you to "do the right thing" and help disconnect us from the dark shadow of corporate secrecy and greed that infect all our lives ultimately--you and your family, too!!!” (EPA-HQ-OAR-2009-0923-3434-2)

Comment:

“What are YOU (EPA) doing about this oil spill. This has global ramifications. Bring in the Clowns, or are they already in charge???” (EPA-HQ-OAR-2009-0923-3435-2)

Comment:

“What we as a nation do from today forward, creates the legacy we leave our children and the future of the Earth. Anyone 60 years or older sees, feels and lives on an Earth facing problems you and I have caused by taking the short term, easiest, most lucrative way. We're told, by those with greed to gain, there's no price to pay for our disregard for the future... but you and I and any thinking person knows differently. You and I, our families, and their families of the future are going to pay the price for our choice to look the other way... Please, let's start today to choose the path that will bring goodness to us all, rather than ruin to the planet upon which we're all blessed to live. I trust you will choose what is right for us all...” (EPA-HQ-OAR-2009-0923-3436-1)

Comment:

““Shake the habit” is the phrase for all Americans from here on out.

-STOP OFFSHORE DRILLING

-NO MORE FOSSIL FUELS

-SHUT DOWN & EXPROPRIATE THESE CRIMINALS” (EPA-HQ-OAR-2009-0923-3439-2)

Comment:

“I am a Colorado physician concerned about global warming and pollution from oil and gas facilities. EPA has finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action. Disclosure reports must rely on actual measured emissions data, not industry estimates--like BP's vast underestimation of the Gulf oil spill volume!” (EPA-HQ-OAR-2009-0923-3441-2)

Comment:

“I am writing to request that you do all you can to protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. EPA has finalized global warming pollution disclosure requirements for other big emitters but because of their strong lobbying efforts, the oil and gas industries have successfully pushed to delay protective EPA action. Please don't let them get away with this!” (EPA-HQ-OAR-2009-0923-3443-1)

Comment:

“To allow oil and gas producers to hide this pollution data is just more of the backward reasoning that allows them to take the world's reserves of fuel supplies (or in the case of Nestle and other mega water bottlers, take control of the world's finite supplies of potable water) and make immense profits from it, while leaving the people, our fellow earth inhabitants and our habitat as well, to suffer the consequences.” (EPA-HQ-OAR-2009-0923-3444-1)

Comment:

“Please stand fast against industries that do not want to reveal their pollution data. Our health, clean air to breathe and clean water to drink must take precedence over their profit margin. It is important that the public have the opportunity to know the extent of pollution being emitted by thousands of facilities in this country including the oil and gas industry which has thus far successfully impeded this action.” (EPA-HQ-OAR-2009-0923-3446-1)

Comment:

“The global warming pollution is potentially THE greatest danger all the world's population face! Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3447-1)

Comment:

“We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector. We are counting on you to help with this important action. We are grateful for any help you can give in preserving the sanctity of our environment - and making improvements where damage has already been done.....THANK YOU! Thank you.” (EPA-HQ-OAR-2009-0923-3448-1)

Comment:

“The oil and gas industry should not have this much power! Citizens have the right to know!”
(EPA-HQ-OAR-2009-0923-3449-2)

Comment:

“Under the Obama administration, the time is right to protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. In spite of EPA's global warming pollution disclosure requirements for other big emitters, the oil and gas industry has successfully delayed protective EPA action.

Finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution is of the utmost importance. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data rather than industry estimates.

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability and will provide policymakers with critical information in the fight against global warming; ensure transparency for all Americans; and help hold large emitters accountable for their emissions.

Thank you for your leadership in cutting air pollution, reducing our dependence on destructive sources of energy, and strengthening America's clean energy economy. We need those new clean jobs.” (EPA-HQ-OAR-2009-0923-3450-2)

Comment:

“If we don't act now, the damage that is being done will continue until it is too late to do anything!

Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3451-1)

Comment:

“THE TIME HAS COME FOR ALL AMERICANS TO LEARN THE TRUTH ABOUT THE POLLUTION BEING EMITTED BY COMPANIES IN OUR COUNTRY SO WE NEED FULL DISCLOSURE AS SOON AS POSSIBLE!!!!!!!!!!!!!! We again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector.” (EPA-HQ-OAR-2009-0923-3452-2)

Comment:

“ALL AMERICANS NEED TO LEARN THE TRUTH ABOUT POLLUTION AND IT'S CAUSES. WE NEED FULL DISCLOSURE NOW!!!!!!!!!!!!!!!!!!!!!!” (EPA-HQ-OAR-2009-0923-3453-1)

Comment:

“We need the facts! Just the facts! So we all can do our part as informed citizens of this wonderful country. We need to vote with our reasoned intellects and so do you.” (EPA-HQ-OAR-2009-0923-3454-2)

Comment:

“Communities appreciate your administration efforts in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean environment and energy economy.

Communities again need your strong leadership in ensuring full disclosure of the global warming pollution emitted by the oil and gas sector. We thank you.” (EPA-HQ-OAR-2009-0923-3455-1)

Comment:

“As head of the EPA, you are probably as concerned about pollution as I am. If you are a parent or grandparent, you sometimes lie awake at night worrying about what kind of world we are leaving to the next generation.

That's why I think it is important for the people to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3456-1)

Comment:

“If we don't know about spills, and venting, how in the world will we be able to protect ourselves from the ravages of pollution. Are we to become one of the many endangered species before we act? We've witnessed the actions of these polluters. What more do we need to happen before we take the issue to task.” (EPA-HQ-OAR-2009-0923-3457-1)

Comment:

“POLLUTION IS AN EQUAL OPPORTUNITY HEALTH HAZARD!” (EPA-HQ-OAR-2009-0923-3458-1)

Comment:

“BP's actions in the Gulf of Mexico illustrate polluters desire to hide behind disinformation and non-information to hide the true impact of the pollution they produce. Please support full, honest disclosure to protect the public.” (EPA-HQ-OAR-2009-0923-3459-2)

Comment:

“As a grandfather from La Grande, OR I'm writing in support of my grandchildren and grandchildren everywhere.” (EPA-HQ-OAR-2009-0923-3461-2)

Comment:

“Please do not move backward in this age of oil scum that is only very slowly beginning to raise its ugly head in the Gulf of Mexico. The people want their government to protect them not join with the polluters or look the other way when it's politically expedient. America honors leaders not politicians!” (EPA-HQ-OAR-2009-0923-3463-2)

Comment:

“It is high time that they were held accountable for their actions and not be let off the hook. The price is just too high.” (EPA-HQ-OAR-2009-0923-3464-2)

Comment:

“The grim BP Gulf spill is only the latest installment in the gross pollution history of the petroleum industry.” (EPA-HQ-OAR-2009-0923-3465-2)

Comment:

“I pray that you will take this seriously and act quickly. Thank you.” (EPA-HQ-OAR-2009-0923-3466-1)

Comment:

“EPA is one of the last lines of defense when it comes to protecting OUR environment; in fact, that's the name of the organization. The public needs your help and all the information it can get to help EPA protect us and our environment.” (EPA-HQ-OAR-2009-0923-3467-2)

Comment:

“IT IS THE LEAST WE CAN ASK: Protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3469-1)

Comment:

“I was shocked when I discovered that the pollution data for oil and gas industries was not already fully disclosed and monitored by some government agency. ZOIKS! Let's fix that!” (EPA-HQ-OAR-2009-0923-3471-1)

Comment:

“I have asthma, and year round allergies. I don't want to have to deal with worsening air quality imposing on my quality of life. I like being able to go outside and hike, bike, camp or just relax. Please don't let polluting companies off easy. It's not just humanity that is affected, but we are the ones who can do something!” (EPA-HQ-OAR-2009-0923-3472-1)

Comment:

“Thank you for what you are doing to lead with strength!

I am asking that you continue to do so and please protect our right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3474-1)

Comment:

“I have faith in the decisions you will make to ensure a world that is sustainable and a joy to live on. Thank you.” (EPA-HQ-OAR-2009-0923-3475-1)

Comment:

“Hopefully this will be a worldwide admission of guilt, as it seems thebig polluters simply close up shop and head to other parts of the world to continue polluting, often in a worse way!” (EPA-HQ-OAR-2009-0923-3476-2)

Comment:

“First let me say that throughout my adult life I have always been andcontinue to be grateful that the EPA watches out for the breathabilityof American air the safety of our land and water. As I

grow older and am developing breathing problems, I am doubly grateful that your agency protects the quality of our cities' air.

Now I am asking you to please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. From our inception, our country has depended on and flourished from the free flow of information. Our government, in particular, has been designed to accommodate an educated public (I realize that over our history, there have been some bumps in that particular road), and I encourage you to take this current step to give the American public the tools it needs to better shepherd our environmental resources." (EPA-HQ-OAR-2009-0923-3477-1)

Comment:

"Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. No more passes, loopholes and skirting the law as MMS has helped the energy businesses over the years. Time to come clean. The US has never been in a better position to talk intelligently and hold the big stick to the energy companies. Americans want better for our children and grandchildren--we need to strike while the iron is hot and hold the energy companies feet to the fire." (EPA-HQ-OAR-2009-0923-3478-1)

Comment:

"I'm sick of the lack of regulation of the big oil companies. How much more damage will be done before anything is done to rein them in?" (EPA-HQ-OAR-2009-0923-3479-1)

Comment:

"I wholeheartedly support the following message crafted by the Sierra Club. How on earth can we give these people a pass? I am horrified by what politics and the Fog of Greed has brought to the doorstep of our country." (EPA-HQ-OAR-2009-0923-3480-1)

Comment:

"We desperately need help here in Texas with our air quality issues. The state is unable or unwilling to regulate natural gas and oil production and development in Texas. I personally live 5 blocks from gas well in production in Denton Texas and have called the Texas Railroad Commission about a toxic drilling mud spill and TCEQ about excessive emission. The field inspectors noted plumes coming from the site and odor but did not test the air quality. The Texas Railroad Commission called the toolpusher on the drilling site and ask them if they spilled and informed the drillers they would be out in the morning to inspect site and we have video of Pioneer drilling covering up the spill site overnight before the state showed up. We are doomed

unless intervention is taken to regulate, enforce, and protect our environment.” (EPA-HQ-OAR-2009-0923-3481-1)

Comment:

“I am someone who live 5 blocks from an urban well in Denton Tx. I have contacted the TCEQ at least 7 times regarding excessive exhaust causing coughing, headaches, nausea, and every time the TCEQ has found nothing to be concerned about. Our neighborhood was so concerned about our air quality we paid for our own air study which showed elevated levels of Toluene, Methane, Carbon Disulfides, and Benzene. Ironically the TCEQ tested on the same day at the same time and found nothing. I was even told by a field agent "we never find anything". On one complaint I have documented evidence of a field agent responding to a complaint observing a plume rising from the drilling site, smelling an odor. When she went on to the site to do testing she was told by an employee for the drilling company they were to "busy" to answer her questions and she could not test on the site. She left without testing. We have observed dumping of raw sewage and a toxic mud spill. We call the TEXAS Railroad Commission and our local emergency responders. I watched our emergency responders standing around and watching Range Resources bulldozing the spill into a culvert on the neighboring property. The TRRC called the tool pusher to inquire about the spill and tell Range they would be out in the A.M. to investigate. Needless to say Range Resources worked on a bulldozer pushing dirt from one side of the property to another. Of course the TRRC went out the next morning and could find no evidence of a spill. We have the employees on the site admitting on our blog to dumping the sewage from their black water holding tanks on to an adjacent property because "everyone does it" The city responded to the complaint 4 weeks later and after calling Range to ask them if they were dumping raw sewage the day of the complaint. Of course by 4 weeks all the evidence I video was gone. This is just on gas well in town imagine what is going on in the rural area where no one is watching! We need help in Texas!” (EPA-HQ-OAR-2009-0923-3482-1)

Comment:

“For our own safety and the environments, we need not be dependent on oil, let alone foreign oil. We need to take care of ourselves with our own resources and take good care of our planet.” (EPA-HQ-OAR-2009-0923-3483-1)

Comment:

“Last February, my son became mysteriously ill just after the white out snow event in Arlington TX. I wanted to find out if reverse pollution was detected on those days at the air monitoring station. I was dismayed to find out the air monitor was at the municipal airport in south Arlington. I thought the UTA natural gas drilling rigs that we are north and downwind from made my child ill. I had issues with the TCEQ giving different answers when I call and speak to

different people. TCEQ Jared Wessel, (817)588-5885 tried to walk me through the process to view online air pollution events. He could not show me the path to get to the emission inventory and had to tell me to use the search feature and type in the words "air pollution events", so that goes to show that the general public cannot access the site unless they know the magic words. I also was walked through the process of looking at the results for the Region 4 Arlington Municipal Airport C61. When we looked at the same screen, the bars were color coded red, yellow, purple and burgundy, there were readings in "underscored bold" and readings in italics, but they were not easy to make sense of the numbers and so I am unable to understand why the monitoring stations are useful if they are not in the right place which should be near gas drilling sites. Today I called and talked with Sandy and for a half an hour I was guided through the same murk and not any enlightened as to what air pollution event might have made my son sick. In March, I called TCEQ to complain about the local pint shops and the odor in my neighborhood-I visited one shop whose filters were not in the exhaust cages, there was follow up over the phone, but it was nothing resolved, the question was whether these shops were big enough to even be on TCEQ's radar. The comment was made that if a TCEQ rep comes out and the odor makes us nauseous and we cannot carry on a conversation that there was nothing that could be done. Since I live in the entertainment district by the Cowboy Stadium, along with paint and body shops and surrounded by gas wells with more to come...we need CONTINUOUS AIR MONITORING STATIONS WITH EASY TO READ ONLINE DATA, AND WE NEED TO KNOW THAT CUMMULATIVE AND VARYING SOURCES OF POLLUTANTS THAT COULD EXPONENTIALLY ENDANGER OUR HEALTH IS BEING MONITORED COLLECTIVELY." (EPA-HQ-OAR-2009-0923-3484-1)

Comment:

“(There is an extensive record of deception, omission, outright lying and denial by the oil companies, refiners, and drillers, which continues even now in the midst of the Gulf catastrophe. Let the public know that pollution continues daily from the use of fossil fuels, even if the Gulf oil well disaster had never occurred.)” (EPA-HQ-OAR-2009-0923-3485-1)

Comment:

“The EPA needs to do the job it was intended for and take on the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3486-1)

Comment:

“I respectfully ask that you set up a system of checks and balances within the EPA and externally with the polluters. I believe that the EPA should control and effectively act as a watch dog on behalf of America, the America which is not part of the corporate lobbies. Every single one of the people in the organization of the EPA must be responsible for doing their job honestly and

competently. The SEC completely failed the American people, please do your part to stand vigil and preserve the habitats of wildlife, and indeed the health of the average person. Thank you for all your work.” (EPA-HQ-OAR-2009-0923-3487-1)

Comment:

“Bad decisions by BP to cut costs have played a huge part in this huge disaster, which affects our southeast coast -- and perhaps ultimately more of the world. How shameful that we have allowed these corporations to exploit resources to make huge profits in a shabby way -- completely unmindful of the possibility of horrific consequences. I usually do not use such extreme language, but this oil drilling mistake is more than serious, and our oil and gas industry does not conduct business as though they are mindful of environmental consequences for the planet.

We have to be the ones to regulate them. Their eyes are on profits only-- and, sad to say, getting away with whatever they can” (EPA-HQ-OAR-2009-0923-3488-2)

Comment:

“This is necessary to help control all of the pollution sources that are created by the oil industry as well as any other industry. Most of this pollution is toxic to humans and other species. We can not afford to have it floating around our environment and sickening and/or killing humans and animals.

Please act swiftly and completely.” (EPA-HQ-OAR-2009-0923-3489-1)

Comment:

“According to a piece on Rachel Maddow's show the other night, it seems oil spills and cleanup methods haven't changed at all in the last fifty years. Isn't it about time we finally get with the program and enter the 21st Century?” (EPA-HQ-OAR-2009-0923-3490-1)

Comment:

“Please tell me why Brazil, an Emerging Economy, has safety controls on their blowout preventers that the US, a Developed Economy does not require???” (EPA-HQ-OAR-2009-0923-3491-1)

Comment:

“This is not good for the future of our children !!” (EPA-HQ-OAR-2009-0923-3492-1)

Comment:

“The BP disaster unfolding in the Gulf reminds us that the oil and gas industry and we who enjoy the use of their products must share the costs.” (EPA-HQ-OAR-2009-0923-3493-1)

Comment:

“This country and its resources are for all, not for the profit and destruction of a few.” (EPA-HQ-OAR-2009-0923-3494-1)

Comment:

“For many years, the oil industry has been making a "killing"(pun IS intended) while we pay at the pump for the destruction of our land, oceans, wetlands, shorelines, marine life, and our own lives. It's time for clean energy NOW - not some time in the future. We have the technology - wind, solar, hydro, etc. It's time these companies be forced to convert and find a way to exist without robbing millions of dollars a day from us. We can no longer afford it nor can we afford to lose our ecosystem, robbing the quality of life for future generations, and perhaps life itself.” (EPA-HQ-OAR-2009-0923-3495-1)

Comment:

“As a resident of Florida and a VERY concerned human being living on this wonderful planet I urge you to do what ever you can to stop this madness. I am sure there is much more to this story than meets the eye but for the sake of my grandchildren and all future generations let's find an alternative fuel source and stop relying on oil.” (EPA-HQ-OAR-2009-0923-3496-1)

Comment:

“Business as usual is literally killing us. We have to hold oil and gas interests (including the companies and ourselves) accountable for the damage their product is doing. Unless we know how to measure and track their green house gases, that can't be done.” (EPA-HQ-OAR-2009-0923-3498-1)

Comment:

“This is the only way that a more realistic estimate of the true amount of global warming emissions can be made. Otherwise any estimate would only be based on "iffy", unreliable hints from the industry, as well as outside observations that would require highly skilled people and accurate instruments which can be quite expensive. Since the industry can keep its own fossil

fuel usage essentially a secret, getting the stuff on their own with no middleman to make an accounting, it really doesn't require much thought to make this decision to include them in the rule. Thank you.” (EPA-HQ-OAR-2009-0923-3499-1)

Comment:

“I have always been an adherent to that famous Forrest Gump phrase: "SHIT HAPPENS" However, the American taxpayer should not be left to clean up corporate shit. They have the resources to clean up their own shit.” (EPA-HQ-OAR-2009-0923-3500-1)

Comment:

“It is doubtful that the Gulf Coast will recover in my lifetime. How much more damage needs to be done before your policies acquire a conscience?” (EPA-HQ-OAR-2009-0923-3502-2)

Comment:

“Reform the MMS by removing all industry supported regulators and then by writing good policies that have the citizens and environment interest foremost in mind, match that with non-industry regulators to truly police the industry.” (EPA-HQ-OAR-2009-0923-3503-1)

Comment:

“MAKE THE OIL INDUSTRY PAY FOR EVERYTHING!!! IT'S THEIR FAULT!!!” (EPA-HQ-OAR-2009-0923-3504-1)

Comment:

“As the lives of so many people living on the Gulf Coast and on the Atlantic it now seems possible, I urge you to take this measure so that it can be avoided in the future.” (EPA-HQ-OAR-2009-0923-3505-1)

Comment:

“We are thoroughly disgusted that government watchdog agencies didn't protect us from this disaster!” (EPA-HQ-OAR-2009-0923-3506-1)

Comment:

“We are devastated by the seemingly unstoppable flood of BP oil into the Gulf. The impact of industry carelessness and wishful thinking on our southern coastline, its fragile ecosystems, fisheries and citizens is tragic.

It is our understanding that the EPA is revisiting the need to require mandatory tracking and reporting by the gas & oil industries of their dangerous, polluting emissions. Please do not allow yourselves to be again bullied (aka lobbied) out of including these industries (both of-shore and on-) under your rules of oversight.

We strongly urge the EPA to hurriedly adopt a stringent regulation industry-wide system requiring impeccable and direct pollution measurements and reporting. Clearly these industries must be managed and held accountable for ALL their pollutions--inclusive of green house gas emissions into the atmosphere.” (EPA-HQ-OAR-2009-0923-3507-1)

Comment:

“This must never happen again. There has to be rules and laws and people to enforce those laws. We, as a Nation, will never survive if we let big business just go on about its business with no thought about how it affects the rest of the Nation. Now I worry and wonder how many people are going to die from all the petroleum products being released and people breathe them in. BP is going to have to pay for a lot of unnecessary deaths because of their negligence.” (EPA-HQ-OAR-2009-0923-3508-1)

Comment:

“BP gives us now a good example of how Big Oil is unaccountable. Last year, the industry lobbied its way out of the mandatory greenhouse gas-reporting rule. This year, the EPA is proposing to set things right and finally include the oil and gas industry in the system. I strongly support that decision and urge you to ensure that the system uses accurate, direct pollution measurements.” (EPA-HQ-OAR-2009-0923-3509-1)

Comment:

“It is very obvious to us, ordinary citizens, that BP was totally unprepared for a disaster of this magnitude and no one in the federal government checked to make sure that they were. Why??????? The number of lives that are being and will be impacted by this spill is unimaginable.

These companies must be reined in and forced to be responsible for all that they do- or don't do!” (EPA-HQ-OAR-2009-0923-3510-1)

Comment:

“BP, Chevron, Shell, etc. should never be allowed to wriggle out of any pollution emission reporting rule and/or regulation.” (EPA-HQ-OAR-2009-0923-3511-1)

Comment:

“It is time the giant energy corporations report what they are doing so that the true cost of fossil fuel production is known, and the public begins to understand that our addiction to gas, oil and coal will cost us our planet if allowed to continue.” (EPA-HQ-OAR-2009-0923-3512-1)

Comment:

“I feel that we need to have every single offshore and onshore oil rig inspected and have it determined that each and every one has the latest (government approved) safety devices to prevent more oil spills and this needs to start NOW!

We cannot live with the greedy and careless oil companies that destroy our national heritage and habitat.

The public needs to get up in arms and demand more safety and not let this continue and continue.” (EPA-HQ-OAR-2009-0923-3513-2)

Comment:

“If Tesla hadn't been killed off, we wouldn't have these problems. **NOMORE GREED!!!!!!!!!!!!!!**” (EPA-HQ-OAR-2009-0923-3514-1)

Comment:

“I feel that the oil and gas industry must be held accountable for the grim BP disaster unfolding in the Gulf.” (EPA-HQ-OAR-2009-0923-3515-1)

Comment:

“I think BP is also the Oil Company that had a leak in the Alaskan Pipeline. Don't allow them to pollute our land or oceans anymore!!!!!!” (EPA-HQ-OAR-2009-0923-3516-1)

Comment:

“Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates. Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.

Other big emitters are subject to global warming pollution disclosure requirements, but the oil and gas industry has successfully pushed to delay protective EPA action.

We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution.

Full disclosure of the oil and gas facilities' global warming pollution emissions would (1) give policymakers essential information in the fight against global warming; (2) ensure transparency of the largest emitters in our neighborhoods and across the country; and (3) help hold large emitters accountable for their emissions.

I appreciate your leadership in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.” (EPA-HQ-OAR-2009-0923-3517-1)

Comment:

“The world needs to change, and you can be part of the solution. While it seems that BP is stepping up and accepting fiscal responsibility for this disaster, let's ensure that every polluter is held accountable. They make the big profits, they can pay for their messes.” (EPA-HQ-OAR-2009-0923-3518-1)

Comment:

“Please hold them accountable and don't let them get away with this.” (EPA-HQ-OAR-2009-0923-3519-1)

Comment:

“The Gulf will be a virtual dead zone for years, if not decades. The cost to marine life, fish and mammal, is immeasurable; the cost to livelihoods throughout the area, criminal. How will BP ever pay for the aftermath when they're already actively denying the present stating there are no plumes of oil within the ocean?” (EPA-HQ-OAR-2009-0923-3520-1)

Comment:

“Please do whatever you can to stop the oil and gas industry to stop running roughshod over America's well being.” (EPA-HQ-OAR-2009-0923-3525-1)

Comment:

“The current oil spills send a particularly graphic message on how oil and gas companies cannot be trusted to monitor themselves. They need to be held accountable for the environmental hazards they present, and the most effective way to do this is by our government monitoring them.” (EPA-HQ-OAR-2009-0923-3527-1)

Comment:

“I couldnt agree more I hope we can do something about this in my life time so the world will be a better place for my kids.And its our right as Americans to be informed about such important things.” (EPA-HQ-OAR-2009-0923-3528-1)

Comment:

“It's time we really need to Clean up our act we will die if we dont and it scares me to death to know how we are literally destroying OUR earth you know big buissness arent the only people who live here me & my family are American tax payers and our voices should count for something.” (EPA-HQ-OAR-2009-0923-3529-1)

Comment:

“In order to tackle the challenges of climate change and environmental degradation (or improvement!), we need to have accurate information to better enable us to chart the most productive course. That would entail knowing the levels of emissions being produced within various industries.” (EPA-HQ-OAR-2009-0923-3530-1)

Comment:

“As Dick Cheney has proven, without full disclosure of the actions of polluters, we cannot have environmental democracy.” (EPA-HQ-OAR-2009-0923-3531-1)

Comment:

“Frankly, I find that the current lack of reporting to be ridiculous. It should be pure common sense that the EPA would have the information and then provide it to the public should that information be important in certain area (for health and safety reasons).” (EPA-HQ-OAR-2009-0923-3532-1)

Comment:

“Please use your office to bring to public awareness which companies are doing the most harm with their business practices.” (EPA-HQ-OAR-2009-0923-3533-1)

Comment:

“We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.

Full disclosure of the global warming pollution emitted by oil and gas facilities is the cornerstone of smart public policy action and accountability and would: provide policymakers with critical information in the fight against global warming; ensure transparency for all Americans, letting us know the largest emitters in our neighborhoods and across the country; and help hold large emitters accountable for their emissions.

I appreciate your leadership in cutting harmful air pollution, reducing our dependence on destructive sources of energy, and creating new job opportunities by strengthening America's clean energy economy.” (EPA-HQ-OAR-2009-0923-3534-1)

Comment:

“First of all, let me congratulate you on some big wins. It's great that we were able to turn back attempts to prevent the EPA from regulating greenhouse gases. Wonderful!

Now I want to ask that you please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3535-1)

Comment:

“I am tired of tactics used by the oil and gas industry to prevent the American public from being kept informed about the global warming pollution they emit into our nation's (and the world's) air and water supplies. I ask that you please protect the public's right to know about the global warming pollution being emitted by the oil and gas industry's thousands of facilities.

EPA has finalized global warming pollution disclosure requirements for other big emitters but the oil and gas industry has successfully pushed to delay protective EPA action. This must no

longer be allowed.

We need your strong leadership in finalizing comprehensive, rigorous requirements for the oil and gas industry to fully disclose its global warming pollution. Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.” (EPA-HQ-OAR-2009-0923-3536-1)

Comment:

“We need your strong leadership in finalizing comprehensive, RIGOROUS REQUIREMENTS FOR THE OIL AND GAS INDUSTRY to fully disclose its global warming pollution. These guys are changing our climate!!! Protective disclosure requirements need to apply comprehensively and rely on actual measured emissions data not industry estimates.” (EPA-HQ-OAR-2009-0923-3537-1)

Comment:

“I share a belief of the public's right to know about global warming pollution which is being emitted by countless numbers of facilities in the industries of gas and oil.

I understand that the EPA has finalized a global warming pollution disclosure requirement for other large emitters, but big oil and gas has delayed protective action.

It is imperative for strong leadership to finalize no- nonsense requirements for the oil and gas industry to disclose its global warming pollution which need to be applied with rigor and on genuinely measured emissions data - not on industry estimates - which would very well be biased.

Full disclosure of the global warming pollution is an essential public policy action, and accountability would furnish critical information in the fight against global warming; It would ensure clarity and inform us of the largest emitters while helping to hold emitters accountable.

We need your leadership in cutting harmful pollution and creating new job opportunities by strengthening America's burgeoning clean energy economy.

I call for strong leadership for full disclosure of the global warming pollution emitted by the oil and gas industry.” (EPA-HQ-OAR-2009-0923-3538-1)

Comment:

“I am 68 years old and have watched and experienced the damages done to Louisiana areas by the refineries and drilling and am well aware of the other areas of our country and the world that have been destroyed by the chemicals and waste from the production of oil and gas.” (EPA-HQ-OAR-2009-0923-3539-1)

Comment:

“Disclosure is the best way to alert citizens of the dangers of pollution, and encourage support of measures to get control of toxic emissions into our environment. Let's press Congress to enact legislation to facilitate and support development of alternative energy sources, and close out the polluters as soon as possible.” (EPA-HQ-OAR-2009-0923-3540-1)

Comment:

“Oil and gas are necessary for our comfortable daily lives, but we need to know the extent of emissions to get people--voters and legislators alike--to take action, whether it is in the form of clean energy, tax incentives for research and production of better products, or common sense things people can do, like biking instead of taking a car and combining shopping trips.” (EPA-HQ-OAR-2009-0923-3542-1)

Comment:

“I am totally disgusted with the attitude of all big oil companies and the damage which they inflict on environment, both air and earth. Like many other persons it has become a morality issue for me if I can in good conscience continue to have stocks in any large oil business or should sell out and never buy again. If many of us begin to feel that oil stocks are immoral investments and in large numbers refuse to purchase them maybe this will affect the companies, which seems to be the only issue these large companies will be sensitive to.

If we are disgusted with banks and their immoral pay scales, it is time we started taking a closer and consistent look at attitudes of huge oil and gas companies and the destruction of modern society.” (EPA-HQ-OAR-2009-0923-0437-1)

Comment:

“Remember, there are lives on this planet. On top of that, just think what the outcome of a hurricane will amount to(water, oil).” (EPA-HQ-OAR-2009-0923-2651-1)

Comment:

“If tax money is used to fix this disaster then the money should be taken from BP and all Oil companies operating in the US. Strict measures must be taken to stop any other disasters. It is very clear that Big Oil has had its way, too long.” (EPA-HQ-OAR-2009-0923-1089-1)

Comment:

“Please protect the public's right to know about the global warming pollution being emitted by thousands of facilities in the oil and gas industry. We urgently need your leadership to rein in the big polluters!” (EPA-HQ-OAR-2009-0923-3460-1)

Comment:

End ALL offshore drilling by 12-31-10.

Comment:

My wife is a severe asthmatic who has been in a hospital ER twice in May of this year. We really need the air cleaned up. This would be a great start.

7.3.2 GENERAL OPPOSITION TO THE RULE

Comment Number: EPA-HQ-OAR-2009-0923-0034-1

Organization:

Commenter: Anonymous

Comment: The government has enough rules and regulations on our lives already. Let the economy rebound before trying to implement any new regulations. Better yet, stay out of the private sector. This democratic republic is light years away from what our founding fathers had in mind.

Response: EPA has considered this comment, and disagrees that today’s final rule is intrusive and detrimental to the economy. For societal benefits, please see Section III.E of the preamble in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-0036-1

Organization:

Commenter: Anonymous

Comment: I disagree with government intrusion into this field. The EPA should be monitoring for pollution in our major streams and rivers only... ONLY. These regulations are, in my opinion, unconstitutional, intrusive, and therefore unlawful. It's only a precursor to the "Cap and Tax" legislation that the POTUS is hoping to jam through Congress shortly.

Response: EPA has considered this comment, and disagrees. Today's final rule is not unconstitutional. Please see Volume 9 of Responses to Comments for the Mandatory Reporting Rule, Chapter 1 on Statutory Authority.

(<http://www.epa.gov/climatechange/emissions/downloads09/documents/Volume9-RTCLegalIssuesRTC-FINAL.pdf>). Today's final rule is neither intrusive nor detrimental to the economy. For societal benefits, please see Section III.E of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-0037-1

Organization: Holliday Environmental Service, Inc.

Commenter: G.H. Holliday

Comment: The Environmental Protection Agency (EPA), on 12 April 2010, 75 FR 18608–18650, published a proposed rule requiring Mandatory Reporting of Greenhouse Gases from petroleum and natural gas systems. These comments express my vigorous opposition to the instant EPA proposed rule.

EPA has failed to support the need for this monumental task. EPA raises the issue of climate change, but does not provide any direct citations for peer reviewed research showing the earth's temperature is increasing. On the contrary, EPA, without citation, references IPCC AR-4, which report has been reduced to little more a rag newsletter, because of the lack of peer review. See <http://wattsupwiththat.com/2010/04/14/ipcc-ar4-also-gets-a-failing-grade-on-21-chapters/> for details. EPA at no time has publicly reviewed the available scientific data regarding physical temperature changes based on uncontaminated data. EPA relies on surface temperature measurements, which are shown to rely on surface weather stations contaminated by extraneous heat sources, Watts, <http://www.surfacestations.org/> Further EPA does not directly state the reason for collecting greenhouse gas data, instead EPA refers to "Climate Change," without demonstrating "Climate Change" is occurring. Singer and Avery, 2007, establish the Little Ice as starting about 1300 AD. This very cold period in the nature existence of Earth continued until about 1850 AD. Ever since 1850 Earth has been recovering from the Little Ice, however, the recovery period ended in about year 2000 AD. All these date and temperatures are generated from proxy data (ice cores and tree ring investigations) so years and temperatures are not exact. The certainly there was warming during the recovery period of 1850 to 2000 AD. But, EPA does not rely on even these data, they rely on IPCC computer programs and surface temperature measurements, which known to be wrong. It was not until 1979 humanity could accurately measure Earth temperature, Figure 1, below:

[See original comment for Figure 1. University of Alabama, Huntsville]

These peer reviewed measurements, Fig. 1, demonstrate an increase of 0.65 °C in 30 years, which not a statistically significant increase in temperature. By reliable physical measurement of Earth temperature, there is no "Climate Change." Further, EPA does not include water vapor as a greenhouse gas, when in reality water vapor is the major greenhouse in Earth's atmosphere. In spite of this fact EPA does not raise the issue of atmospheric wet vapor in the proposed rule. Also, there are no real cost data. EPA says at 75 FR 18610:

Response: EPA has considered this comment, and concludes it is out of scope with the Mandatory Reporting Rule. Please see the response to comment number EPA-HQ-OAR-2008-

0508-0615 in Volume 7 of last year's Mandatory Reporting Rule (link: <http://www.epa.gov/climatechange/emissions/downloads09/documents/Volume7-CleanV2.pdf>).

Comment Number: EPA-HQ-OAR-2009-0923-0041-1

Organization:

Commenter: Anonymous

Comment: This is a great idea, if you want to increase energy costs for all Americans. That will really be the only effect. Besides, there hasn't been any substantial evidence (other than very vague personal opinions) about the downsides of greenhouse gases. How about we keep the environmentalist agenda out of all Americans' pocketbooks.

Response: EPA has considered this comment, and disagrees that today's final rule is detrimental to the economy. For societal benefits, please see Section III.E of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-0055-1

Organization: Indaco Air Quality Services, Inc.

Commenter: Touche Howard

Comment: Subpart W requires too much too soon, and as a result, the volume of work may compromise both data quality and safety. There are relatively few experts in natural gas leak measurements, and safety concerns and measurement complexities limit how quickly this capacity can be increased.

Response: EPA recognizes that for certain reporters, compliance with today's final rule may require recognition of safety issues and data quality in monitoring emissions and conditions. EPA is confident that the petroleum industry will not compromise safety in complying with the rule, and EPA has provided both alternative methodologies and the option to request Best Available Monitoring Methods. Please see the response to EPA-HQ-OAR-2009-0923-1167-57

Comment Number: EPA-HQ-OAR-2009-0923-1026-1

Organization: Dominion Resources Services, Inc.

Commenter: Pamela Faggert

Comment: The Mandatory Reporting of Greenhouse Gases from the Petroleum and Natural Gas Systems as re-proposed on April 12, 2010 is significantly more onerous than the 2009 proposal because it addresses a much larger universe of sources and components. In this re-proposal EPA added onshore production and natural gas distribution operations. With these additions, the entire natural gas system from well head to burner tip would be required to inventory greenhouse gas emissions for almost every piece of equipment regardless of size or emissions potential. In order to conduct such an inventory, the natural gas industry as a whole would be required to catalog and estimate emissions from almost every piece of operating equipment in every operation, not only at pressure reducing stations, but also along the gathering and transmission pipelines. Furthermore, the scope of the information required to be reported goes far beyond reporting of greenhouse gas emissions, the stated intent of the rule. The natural gas distribution and LNG

import and export and storage sectors represent a very minor portion of the total GHG emissions in this country, less than one percent of the total, but will be required to allocate valuable resources to document and report these minor emissions.

Therefore, Dominion urges EPA to reconsider including the distribution and LNG sectors in the requirements of Subpart W and to limit the reporting parameters for the remaining sectors to greenhouse gas emissions only, rather than including operating and design parameters that are outside the scope of the stated intent of the rule. If EPA desires to develop information and data that would serve as the basis for more accurate emission factors, Dominion would fully support that effort, both as a company and through our trade associations. However, Dominion strongly believes that this should be a separate undertaking, independent of this reporting rule.

Response: EPA has considered issues raised in this comment. Inclusion of emissions sources in the onshore petroleum and natural gas production in today's final rule is necessary because operations in the onshore petroleum and natural gas production account for approximately 66-percent of equipment leaks, vented, and incremental combustion emissions from the petroleum and natural gas industry. Secondly, EPA does not agree that "every piece of equipment regardless of size or emissions potential" has been included in today's rule. In fact, even in the proposed rule EPA included sources in each segment which were estimated to total nominally 80% of the segment emissions. Since release of the proposed rule in April 2010, EPA has made several changes to the detection, monitoring, measurement, and estimation of emissions from various source types. EPA has made these changes with the intention of reducing costs and burden associated with reporting emissions from all segments of the petroleum and natural gas industry.

For a list of revisions made in today's final rule, as well as summary of methods for calculating GHG emissions, please see Sections II.D and II.E of the preamble, as well as Section 98.233. EPA has also required inclusion of operating and design parameters for certain sources where that information is judged to be relevant to gathering activity data from sources. In addition, EPA encourages trade associations and companies to develop more accurate emission factors. EPA agrees that should be a separate undertaking from the reporting rule.

EPA has also concluded that it is important that the LNG storage, import, and export and natural gas distribution segments should be included in today's final rule. While their emissions contributions are significantly smaller than several other segments, EPA has determined that it is important to perform monitoring, measurements, and calculations to estimate emissions from segments identified in today's final rule.

Please refer to comment and responses EPA-HQ-OAR-2009-0923-1299-12 for discussion on exclusion of LNG facilities, and to EPA-HQ-OAR-2009-0923-1016-5 for exclusion of natural gas distribution (LDC) facilities.

Comment Number: EPA-HQ-OAR-2009-0923-1033-1

Organization: WBI HOLDINGS, INC.

Commenter: Stacy M. Aguirre

Comment: This letter is written to inform EPA that WBI Holdings, Inc. (WBIH) has reviewed and agrees with comments submitted by the Interstate Natural Gas Association of America (INGAA) in response to the Proposed Rule, Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems (40 CFR Part 98, Subpart W) dated April 12, 2010 (75 FR 18608).

Response: In developing today's final rule for the petroleum and natural gas industry segment, EPA has considered this comment, as well as those submitted by INGAA. For EPA's response to these comments, please review comments for which INGAA's name appears next to the label, "Organization" in the response to comment documents.

Comment Number: EPA-HQ-OAR-2009-0923-1042-1

Organization: ConocoPhillips Company

Commenter: Dan F. Hunter

Comment: ConocoPhillips understands EPA's intent to gather data to inform and implement policies necessary to address climate change. However, the proposed rule is unnecessarily burdensome in gathering specific source data with very little incremental emissions accuracy for the level of resources required to acquire the information.

Response: EPA has made revisions to methods for monitoring, measuring, and calculating GHG emissions. Please review Sections II.D and 98.233 in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1064-5

Organization: Vorys, Stater Seymour and Pease LLP

Commenter: Gregory D. Russell

Comment: The Association joins and supports the comments filed in this docket by the Independent Petroleum Association of America.

Response: In developing today's final rule for the petroleum and natural gas industry segment, EPA has considered this comment, as well as those submitted by the Independent Petroleum Association of America. For EPA's response to these comments, please review comments for which Independent Petroleum Association of America's name appears next to the label, "Organization" under various comment documents.

Comment Number: EPA-HQ-OAR-2009-0923-1298-9

Organization: Independent Petroleum Association of Mountain States

Commenter: Kathleen M. Sgamma

Comment: In general, IPAMS does not believe the rule represents an appropriate balance between regulating greenhouse gas reporting and enabling production of domestic energy necessary to power the American economy and provide jobs. EPA should strive to achieve a better balance in its regulations so that the economic activity that is affected by the diversion of resources from productive to regulatory activities is commensurate with the level of

environmental protection achieved. IPAMS does not believe that balance is met with the rule, as facilities emitting very small amounts of GHG emissions will be covered.

Response: EPA has reviewed this comment, and disagrees that today's final rule regulates greenhouse gas reporting at the expense of domestic energy production and economic growth. For a review of societal benefits associated with this rule, please see Section III in the preamble of today's final rule. It details costs and economic impacts of the Rule, as well as its societal benefits and impact on businesses. In addition, EPA has made a number of modifications and clarifications in today's final rule to provide quality emissions data at a reduced burden. Please see Section II.E of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-3568.1-11

Organization: American Gas Association

Commenter: Pamela Lacey

Comment: Therefore, we urge you to postpone requiring fugitive emission reporting for natural gas distribution under Subpart W.

Response: EPA disagrees with this comment. Please see the response to EPA-HQ-OAR-2009-0923-1152-2

Comment Number: EPA-HQ-OAR-2009-0923-0102-1

Organization: Anonymous

Commenter: Anonymous

Comment: This proposed rule is a bad idea because it will cost the industry more money to be able to comply with the rule as well as costing more money to determine how many and how much greenhouse gases they emit. This will raise the price of petroleum and natural gas because the rise in operating costs are passed on to the consumer.

Response: Please see the response to EPA-HQ-OAR-2009-0923-1303-2 in Volume No. 10 for a discussion of the impact of today's final rule on fuel prices.

Comment Number: EPA-HQ-OAR-2009-0923-1303-3

Organization: Texas Department of Agriculture

Commenter: Todd Staples

Comment: Finally, I reiterate my concerns with EPA's current efforts to regulate greenhouse gas emissions and carbon dioxide under the Clean Air Act based on the data promoted by the U.N. Intergovernmental Panel on Climate Change. Regulatory action taken by EPA in respect to greenhouse gas emissions will have a detrimental impact on American families and businesses and must have a proven benefit, which at this time is not apparent.

Response: EPA's legal authority is discussed in Section I.C of the preamble in today's final rule and in Volume 7, The Rule Development Process, Statutory and Executive Order Reviews and Other Miscellaneous Comments, of the EPA's Response to Public Comments for the Final MRR,

comment number EPA-HQ-OAR-2008-0508-0615. Regarding IPCC data, this rule is not the appropriate forum for a discussion about GHG regulation or underlying science. Please see the response to EPA-HQ-OAR-2009-0923-0061-2, which includes information on the detrimental impact of climate change in the United States.

7.3.3 OTHER

Comment Number: EMAIL-0001-9 (comment also located in rulemaking memo “Early Comment Submissions” in docket EPA-HQ-OAR-2009-0923)

Organization: American Exploration and Production Council

Commenter:

Comment: Minority Owners

Has the requirement for minority owners to sign-off on reported emissions been removed?

Response: There is no requirement for minority owners to sign off on reported emissions in today’s final rule. Please see subpart A of the Mandatory Reporting Rule, Section 98.4, and the response to EPA-HQ-OAR-2009-0923-1024-16 for clarification of the role of designated representative and owners or operators.

Comment Number: EPA-HQ-OAR-2009-0923-3546-5

Organization: Texas Commission on Environmental Quality

Commenter: Mark R. Vickery

Comment: A word is missing in SECTION 98.235(c)(10). Add the word tank, after "For each" in the first sentence.

Response: : Section 98.235 in the preamble to the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002) does not contain a subsection (c)(10);; it would appear the comment is referring to Section 98.236(c)(1). In today’s final rule, Section 98.236(c)(10) is now 98.236(c)(8), and text has been clarified so that the recommended clarification is no longer needed. Section 98.236(c)(8) now reads, “For gas emitted from produced oil sent to atmospheric tanks.”

Comment Number: EPA-HQ-OAR-2009-0923-0055-13

Organization: Indaco Air Quality Services, Inc.

Commenter: Touche Howard

Comment: Safety. Leak measurements at natural gas compressor stations are conducted in an environment with numerous safety challenges. These challenges can be met, but it is important to allow enough time for companies to address the following issues for large scale survey programs:

1) Explosive atmosphere. Any work in the facility will either require intrinsically safe equipment or a “Hot Work” permit (which requires periodic screening to verify that gas concentrations in the area of work remain below safe levels). Leak measurements require that personnel specifically go to the area where explosive concentrations are most likely to be present. This is particularly true on measurements for vented components where leak rates are often substantially larger than at standard components, resulting in a cloud of explosive gas around the personnel. It is critical that personnel are properly trained on how to remain safe in this environment. Examples of hazards include bringing manlift bucket circuitry (which is not usually intrinsically safe) within the gas cloud, striking the steel vent pipe with any material which might cause a spark (including being bumped by the manlift or by metal fittings on harnesses), losing control of a vent bag filled with natural gas, which could be blown onto a hot surface such as an exhaust stack and combust, or inadvertently venting natural gas through the High-Flow Sampler to a location where large concentrations are not expected. Static charges may also be an important risk factor.

2) Fall Risk. Measurements at elevated vents require personnel to use manlifts, ladders, or roof access, usually on sloped roofs. This requires training in fall protection equipment including harnesses and lanyards and proper tie off techniques. Not all vents will be accessible by manlift and will require the set up of systems that will safely allow traversing sloped roofs.

3) High Pressure Gas. Hazards involve the possibility of breaking off a sensitive component and venting gas or that a blow down will occur at a vent while it is being measured. Severe injury could result should a measurement specialist have their head or hands in the path of the blow down. Personnel must also be trained properly so that vents such as rod packing vents are not subjected to any significant back pressure which could cause safety or operational problems.

4) High Temperatures. The risks from high temperatures include burns from touching hot components as well as heat exhaustion from the working near high temperature sources.

5) Moving machinery. Many components are either constantly moving or can move due to remote activation and can cause serious injury should clothing or a body part be caught in the system.

6) Air Toxics. Measurements at condensate tank vents require additional respiratory personal protective equipment due to the heavier hydrocarbons that may be venting from the tank.

Response: To address potential safety issues raised in this comment, EPA has added alternative methodologies for monitoring, measuring, and estimating GHG emissions from various source types in the petroleum and natural gas industry. For a list of these changes, please see Section II.F of the preamble in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-0060 -3

Organization:

Commenter: M. McDonnell

Comment: Is there any consequences for organizations that report high emissions? What will be done if they are producing dangerous amounts of GHG emissions? There are obvious signs of climate change due to GHG emissions and I think this is a step in the right direction, but I think there should be more steps taken to decrease GHG emissions.

Response: The Mandatory Reporting Rule goal is collect greenhouse gas emissions data to help inform future policy or regulation. Today's rule does not regulate emissions of GHGs. For further information on the background and intent of today's final rule, please refer to Section I.B of the preamble.

Comment Number: EPA-HQ-OAR-2009-0923-1014-1

Organization: Independent Oil and Gas Association of West Virginia

Commenter: Charlie Burd

Comment: Support of Comments Filed by the Independent Petroleum Association of America
As an initial matter, IOGA-WV wishes to note for the record its full endorsement of the comments submitted by Independent Petroleum Association of America ("IPAA") with regard to Subpart W.

Response: In developing today's final rule for the petroleum and natural gas industry segment, EPA has considered this comment, as well as those submitted by IPAA. For EPA's responses to these comments, please refer to all comments where "Independent Petroleum Association of America (IPAA)" is identified as the organization.

Comment Number: EPA-HQ-OAR-2009-0923-1027-1

Organization: Offshore Operators Committee

Commenter: Allen Verret

Comment: OOC appreciates the consideration of previous comments into the new proposal; however, there are several issues in the re-proposal of Subpart W the OOC would like to comment on. Each of these issues is discussed below. In addition to the comments submitted below, OOC supports the comments submitted by the American Petroleum Institute (API) on the proposed rule.

Response: In developing today's final rule for the petroleum and natural gas industry segment, EPA has considered this comment, as well as those submitted by API. For EPA's responses to these comments, please refer to all comments where "American Petroleum Institute (API)" is identified as the organization.

Comment Number: EPA-HQ-OAR-2009-0923-1039-1

Organization: Interstate Natural Gas Association of America

Commenter: Lisa Beal

Comment: While INGAA understands EPA's mandate to develop GHG reporting requirements, INGAA believes that reporting requirements must properly and equitably balance reporting burden with reasoned objectives for data quality and accuracy. The vital role of natural gas in

meeting national environmental and energy security objectives should also be acknowledged while ensuring that inequitable burden is not placed on this industrial sector.

Response: In developing an emissions-reporting system for the petroleum and natural gas industry segment, EPA has considered the need to balance data quality and accuracy with administrative and cost burdens on reporters. For this reason, EPA has paid close attention to comments received during each comment period, and adopted measures to facilitate the monitoring, measuring, and estimation of emissions from reporters. Subsequent to receiving comments regarding the April 2010 proposed rule found in docket (EPA-HQ-OAR-2009-0923-0002), EPA has made additional revisions to further reduce burden on reporters. For these revisions, please see Sections: II.D, II.E, II.F, as well as Section III, of the preamble in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1082-4

Organization: MidAmerican Energy Holdings Company

Commenter:

Comment: In addition, a significant aspect of the proposed reporting rule focuses on fugitive emissions which, under the proposed definition, are “emissions which are unintentional and could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening”—i.e., emissions that cannot effectively be controlled. Virtually every natural gas transmission pipeline owner and local distribution company has incentive to reduce fugitive emissions – doing so reduces costs to the companies and their customers and reduces safety risks. Northern Natural Gas has received repeated national recognition for its leak and emissions reduction program under the Natural Gas STAR program.

Response: EPA recognizes that some natural gas transmission pipeline owners or local distribution companies have incentives to reduce equipment leak emissions but in a number of cases, organizations do not own the natural gas that they are transporting or delivering. As a result, as long as they are meeting their negotiated lost and unaccounted rates, these companies actually have no incentive beyond safety requirements to further reduce emissions. While Northern Natural Gas has a leak and emission reduction program, the goal of today's rule is to determine current emission levels across all industry sectors, and gather data so that emissions inventory over time can be more consistently measured to inform future policy.

Comment Number: EPA-HQ-OAR-2009-0923-1082-6

Organization: MidAmerican Energy Holdings Company

Commenter:

Comment: As policymakers debate the appropriate mechanism to reduce greenhouse gas emissions, it is important to consider that natural gas is an important bridge fuel in the short term. It is also important to ensure that emissions from natural gas are not magnified in a way that reduces its future viability. Overstating emissions from the natural gas sector may lead policymakers to make poor policy decisions in determining the appropriate regulatory framework to address these emissions.

In the EPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990 – 2005, it is suggested that "oil and gas systems are the largest man made source of methane emissions (26%) and make up 2% of total U.S. greenhouse gas emissions." While these systems make up 2% of total U.S. greenhouse gas emissions, EPA has proposed to require the implementation of a process involving an expenditure of \$56.0m initially and \$21.0m annually to monitor 2% of U.S. greenhouse gas emissions with benefits that "are very difficult to quantify and monetize."

Response: For a response to this comment, please see the response to comment EPA-HQ-OAR-2009-0923-1039-1.

Comment Number: EPA-HQ-OAR-2009-0923-1097-3

Organization: San Juan Citizens Alliance

Commenter: Josh Joswick

Comment: There is also a need to streamline an EPA communications and decision matrix out of offices in Denver, Dallas and San Francisco, and to ensure that data is available to the public in a format that enables reporting by county, state, basin, and EPA region.

Response: EPA does not agree with this comment. Today's final rule is designed to collect data necessary to inform national greenhouse gas policy in regard to the oil and gas sector. In order to manage burden while concurrently gathering necessary data, EPA will not require the reporting of emissions data from the petroleum and natural gas sector by county, state and EPA region level.

While there may be interest from the public in identifying emissions by county, state and EPA region, there are some practical challenges to this. First, even though basins could be associated with county boundaries under the AAPG definition, basin boundaries do not necessarily add up to county, state, or even EPA region boundaries. Second, making collected emissions data available at any of these levels would involve estimations or calculations that would only add ambiguity to the definition of "facility" in today's final rule. Third, offering data in the manner described would introduce additional burden on reporting entities.

EPA has designed today's final rule in a fashion which provides collection of data in a fashion so that future national policy can be informed. Alternatives suggested by the commenter may be considered in the future.

Comment Number: EPA-HQ-OAR-2009-0923-1151-18

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment: Section 98.7(m)(1) Add the following AAPG publication to the reference in Section 98.7 (m) (1): Alaska Geologic Province Boundary Map; AAPG - CSD - USGS; 1978

Response: EPA has modified Section 98.7 after considering this comment. Please see Section 98.7(p)(1) and 98.7(p)(2) in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1151-49

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment: Section 98.233(u) GHG volumetric emissions. All sampling requirements should refer to Section 98.233(u) rather than being scattered throughout the rule.

Response: EPA disagrees that all sampling requirements in today's final rule should refer to Section 98.233(u).

First, EPA has identified sampling requirements in today's final rule according to whether it fits in with the subject matter of a particular section. Second, Section 98.233(u), "GHG volumetric emissions," is not related to sampling requirements. It contains the procedures for calculating GHG volumetric emissions at standard conditions. Where such a procedure is required under any of the calculations in Section 98.233, today's final rule references Section 98.233(u).

Comment Number: EPA-HQ-OAR-2009-0923-1151-85

Organization: American Petroleum Institute

Commenter: Karin Ritter

Comment: The paragraph numbering in Section 98.233(h) requires correction: Section 98.233(h)(i) should be Section 98.233(h)(1); Section 98.233(h)(ii) should be Section 98.233(h)(2); and Section 98.233(h)(iii) should be Section 98.233(h)(i) since it begins a new section for blowdown vent stacks.

Response: EPA agrees, and has made the appropriate changes in today's final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1156-22

Organization: Laclede Gas Company

Commenter: Steve Donatiello

Comment: APPENDIX A

LACLEDE GAS COMPANY

LEAK-RELATED GAS SAFETY INSPECTION/MAINTENANCE PROGRAMS

Program	Regulation	Description, Frequency	Missouri Exceeds Federal Requirement
Transmission Line Patrol	4 CSR 240-40.030 (13)(C) and 49 CFR Part 192.705	Patrol of surface area over mains and rights-of-way. Frequency: Completed twice each calendar year for transmission lines and 4 times each year for highway and railroad crossings.	
Transmission Line Leak Survey	4 CSR 240-40.030 (13)(D) and 49 CFR Part 192.706	Instrument leak survey (walking or mobile) Frequency: Completed twice each calendar year not to exceed 7-1/2 months.	
Continuing Surveillance	4 CSR 240-40.030 (12)(H) and 49 CFR Part 192.613	Continual review of facilities to determine and take appropriate action concerning class location changes, failures, leakage, and other unusual operating and maintenance conditions. Frequency: A class change review of transmission lines operating over 40% specified minimum yield strength (SMYS) and population centers served by the distribution system shall be conducted every 5 years.	
Facility Inspections	4 CSR 240-40.030 9(Q) and 13(L)2 and 49 CFR Part 192.481 and 192.721	Visual inspection of above-ground piping and instrument leak survey at both sides of crossing. Frequency: Once each calendar year.	
Facilities Inspections with Anticipated Physical Movement	4 CSR 240-40.030 13(L)2 and 49 CFR Part 192.721	Visual inspection of above-ground piping where anticipated physical movement or external loading could cause failure or leakage. Frequency: Four times each calendar year not to exceed 4-1/2 months in business districts. Twice each calendar year not to exceed 7-1/2 months outside business districts.	
Feeder Line Patrol	4 CSR 240-40.030 (13)(L)3	Mobile or walking patrol of feeder lines (includes most 8 inch and all smaller than 8-inch supply feeder mains). Frequency: Once each calendar year not to exceed 15 months. State vs. Federal: Not required by Federal rules.	X
Unprotected Steel Main Leak Survey	4 CSR 240-40.030 (13)(M)2.B. and (15)(C) and 49 CFR Part 192.723(b)(2)	Mobile instrument leak survey of unprotected steel mains. Frequency: Performed once each calendar year, not to exceed 15 months. State vs. Federal: Federal requires every 3 years.	X
Other Main Surveys – Mobile	4 CSR 240-40.030 (13)(M) and 49 CFR Part 192.723(b)(2)	Mobile instrument leak survey of coated steel and plastic mains. Frequency: Performed once each third calendar year, not to exceed 39 months. State vs. Federal: Federal requires every 5 years.	X
Systematic Service Inspections (SSI) – Plastic and Coated Steel Services	4 CSR 240-40.030 (13)(M) and 49 CFR Part 192.723(b)(2)	Consists of walking instrument leak survey over service line and meter set. Also includes visual inspection of outside meter set. Frequency: Every third calendar year not to exceed 39 months. State vs. Federal: Federal requires every 5 years.	X
SSI – Unprotected Steel Service Lines	4 CSR 240-40.030 (13)(M)2.B. and (15)(C) and 49 CFR Part 192.723(b)(2)	Consists of walking instrument leak survey over service line and meter set. Also includes visual inspection of outside meter set. Frequency: Annually. State vs. Federal: Federal requires every 3 years.	X
Unprotected Steel Yard Lines	4 CSR 240-40.030 (13)(M)2.B. and (15)(C)	Instrument leak survey over identified buried yard lines from the meter to the point of entry. Frequency: Annually. State vs. Federal: Not required by Federal rules.	X
High Pressure Buried Fuel Lines Survey	4 CSR 240-40.030 (13)(M)2.B.(III)	Partial perimeter instrument leak survey on buildings with 2 psig or greater delivery pressure. Frequency: Every third calendar year not to exceed 39 months. State vs. Federal: Not required by Federal rules.	X

Program	Regulation	Description, Frequency	Missouri Exceeds Federal Requirement
Business District Surveys	4 CSR 240-40.030 (13)(M)2.A. and 49 CFR Part 192.723(b)(1)	Walking instrument leak survey is performed in business districts. Frequency: Performed once every calendar year, not to exceed 15 months.	
Leak Reinspections	4 CSR 240-40.030 (14)(C)3	Re-evaluation of class 3 leaks. Frequency: Twice per year, not to exceed 6-1/2 months. State vs. Federal: Not required by Federal rules.	X
Service Call Leak Tests – Service Entrance Inspection	4 CSR 240-40.030 (14)(B)6	A bar-hole combustible gas indicator (CGI) leak test is made at the service entrance of a customer premise whenever work is performed on a customer premise for any type of customer gas call. If served by an inserted copper service, one additional bar-hole is made at the property line, 100 feet from the structure or at the tee, whichever is closest to the structure. If not direct buried copper, inspection only required if not surveyed in last 15 months. Frequency: On service calls described above. State vs. Federal: Not required by Federal rules.	X
Corrosion Control – Exposed Metallic Main Inspection	4 CSR 240-40.030 (9)(F) and 49 CFR Part 192.459	Visual inspection whenever a buried metallic pipeline is exposed. If active corrosion is found or corrosion has caused a leak, need to determine extent of the corrosion requiring remedial action. Frequency: As piping is exposed.	
Corrosion Control - Atmospheric Corrosion Inspection - Inside Sets and Facilities	4 CSR 240-40.030 (9)(Q) and 49 CFR Part 192.481	Visual inspection for pitting or scale on piping and material from the point of entry (POE) to meter outlet. Frequency: Every 3 years. Repair must be completed within 12 months of the failed inspection date. State vs. Federal: Federal does not specify 12 month repair.	X
Corrosion Control - Atmospheric Corrosion Inspection - Outside Sets and Facilities	4 CSR 240-40.030 (9)(Q) and 49 CFR Part 192.481	Visual and instrument leak survey of outside piping and facilities. Frequency: Every 3 years. Repair must be completed within 12 months of the failed inspection date. State vs. Federal: Federal does not specify 12 month repair.	X
Corrosion Control - Isolated Metallic Fittings	4 CSR 240-40.030 (9)(I)1 and (9)(I)4	Electrical survey of isolated metallic fittings. Frequency: Once every 10 years. Corrective measures must be completed within 6 months. State vs. Federal: Not required by Federal rules.	X
Corrosion Control - Isolated Steel Service Lines	4 CSR 240-40.030 (9)(I)1. (every 5 years) and 49 CFR Part 192.465 (every 10 years)	Electrical survey of isolated steel service sections less than 100 feet; 2-inch or smaller services; 3-inch, 4-inch, or 6-inch steel risers on plastic services; steel below grade entries on plastic services. Frequency: 20% of qualifying sections completed annually (every five years). Corrective measures must be completed within 6 months. State vs. Federal: Federal requires every 10 years.	X
Corrosion Control - Cathodically Protected Mains and Services greater than 100 ft.	4 CSR 240-40.030 (9)(I)1 and (9)(I)4 and 49 CFR Part 192.465(a)	Electrical survey of all cathodically protected steel mains and cathodically protected steel service lines greater than 100 feet in length. Frequency: Once each calendar year not to exceed 15 months. Corrective measures must be completed within 6 months. State vs. Federal: Federal does not require repair within 6 months.	X

Response: Please refer to the response to EPA-HQ-OAR-2009-0923-1016-20. Also, for more details, please see “Understanding the Substance of the DOT Regulations and Comparing Them to the Subpart W Requirements,” found in docket EPA-HQ-OAR-2009-0923, in addition to Sections II.D through II.F of the preamble and Section 98.233 of today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1172-1

Organization: CenterPoint Energy, Inc

Commenter: Richard Bye

Comment: CenterPoint Energy, Inc. supports the detailed technical comments filed in this docket of the Interstate Natural Gas Association of America (INGAA), and the American Gas Association (AGA).

Response: EPA has considered this comment, as well as those submitted by INGAA and AGA. For EPA's responses to these comments, please review all comments where "Interstate Natural Gas Association of America (INGAA)" or "American Gas Association (AGA)" is listed as the organization.

Comment Number: EPA-HQ-OAR-2009-0923-1198-5

Organization: West Virginia Oil and Natural Gas Association

Commenter: Nicholas DeMarco

Comment: Further, this proposal requires much more than the reporting of GHG emissions. It includes operating and design parameters that were outside of the stated intent of the rule - - to inventory and report GHG emissions. It would seem that the proposed rule, with all of its additional requirements and its applicability to every single emissions source within this industry, would be establishing a set of emission factors for the oil and gas industry, which is outside the scope of this reporting rule.

Response: Today's final rule requires the reporting of GHG emissions based on the use of multiple methods of quantification, including some direct measurement, some engineering estimates based on operating and design parameters, and some emission factors. EPA is utilizing a combination of methodologies to achieve adequate quality data at reasonable burden to reporters. Today's final rule also does not apply to every single emissions source. The included sources are based on EPA's best current estimate of major contributing sources in each segment of the industry. The intent of today's final rule is not to establish a set of emission factors.

Comment Number: EPA-HQ-OAR-2009-0923-1201-23

Organization: North Slope Borough

Commenter: Edward S. Itta

Comment: EPA Should Consider and Address the Environmental Justice Benefits of Potential Reporting Thresholds.

EPA should be sensitive to the disproportionate impacts faced by our residents from climate change. Issues of environmental justice should be specifically addressed in the consideration of GHG reporting thresholds and ultimately, in comprehensively controlling greenhouse gas emissions produced in the United States. Federal agencies must "make achieving environmental justice part of ... [their] mission[s]."⁷⁹ EPA thus must work to ensure effective public

⁷⁹ Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."

participation and access to information, and must “ensure that public documents, notices, and hearings relating to human health or the environment are concise, understandable, and readily accessible to the public.”

EPA should also fully consider environmental justice issues when evaluating whether to lower reporting thresholds and in designing its monitoring and auditing programs.

Thank you for your consideration. If you have any questions about these comments, or if we can be of further assistance in this matter, please do not hesitate to call.

Response: The intent of today’s final rule is to collect emissions data from the petroleum and natural gas industry on a national level in order to inform policy and to provide public stakeholders with knowledge about the source and magnitude of emissions from the petroleum and natural gas sector including minority and low-income populations. For further information on how today’s final rule would address some of the issues raised in this comment, please refer to Section III.E of the preamble in today’s final rule.

Comment Number: EPA-HQ-OAR-2009-0923-1306-23

Organization: DTE Energy

Commenter: Gregory L. Ryan

Comment: Incorrect Equations/references

98.233(h) and 98.233(i) are incorrectly formatted. In this case 98.233(i) is erroneously listed as 98.233(h)(iii). Also, 98.233(h)(i) and 98.233(h)(ii) should be 98.233(h)(1) and 98.233(h)(2) respectively.

Response: For a response to this comment, please see the response to comment EPA-HQ-OAR-2009-0923-1151-85.

Comment Number: EPA-HQ-OAR-2009-0923-2308-1

Organization:

Commenter: R.D. Sullivan

Comment: It is evident to some of us in South Louisiana that our parents made a pact with the devil. In exchange for gold, they sold the earth on which our ancestors had been, as many of the old French songs say, an earthly "paradise". There is even a little town called "Paradis" just south of New Orleans.

Some of my generation want to continue this pact. Others, like myself, want another pact. I want a pact with clean energy, which will allow my children and descendants perhaps to create again a paradise in South Louisiana.

The arguments about capitalism are moot here. We no longer have capitalism in the United States because we no longer have free enterprise, competition and innovation. We have corporatism. For the corporations, the bottom line is the bottom line, and profit is their only idea of culture.

We in South Louisiana, in the United States and in the entire world have larger ideas of culture. Culture is the way we live to be as happy as possible on this earth. Corporations have no way of calculating happiness in their balance sheets. Do not let corporations get away with anything. Only government is powerful enough to compel them to respect the people.

Only last week, I was visiting the husband of the recently retired chief of the Houmas Tribe. He is Dr. Michael Robichaux, and he was at one time Louisiana senator for his district. He fought as a senator and is fighting as a doctor the corporations that import hazardous waste into the Houmas areas and dump it into open pits. They are legally permitted to claim that all petroleum by-products are "non-hazardous" by definition. People are becoming ill from these fumes, and he suspects that the mental retardation of one child living near-by may be due to the fumes. This horrid local example of corporate brutality and viciousness reveals why the government absolutely must control the corporations.

Response: EPA thanks the commenter for their remarks. For societal benefits resulting from today's final rule, please see Section III.E of the preamble.