

To: Dravis, Samantha[dravis.samantha@epa.gov]
From: Khary Cauthen
Sent: Thur 5/25/2017 11:48:25 PM
Subject: FYI: API letter requesting withdrawal and revisitation of the Oil & Gas CTGs
[API Comments on Draft CTGs 12042015.pdf](#)
[2017-05-25 Letter to EPA re CTGs Final.pdf](#)

From: Howard Feldman
Sent: Thursday, May 25, 2017 5:06 PM
To: Dunham, Sarah (Dunham.Sarah@epa.gov)
Subject: API letter requesting withdrawal and revisitation of the Oil & Gas CTGs

Sarah,

Please see the attached letter from API requesting that EPA withdraw and revisit the *Control Techniques Guidelines for the Oil and Natural Gas Industry* (CTGs), released on October 27, 2016. Please let me know if you have any questions.

Be well,

Howard

Howard J. Feldman

Senior Director

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May 25, 2017

Ms. Sarah Dunham
Acting Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20004
Sent via email: Dunham.sarah@epa.gov

Re: Control Techniques Guidelines for the Oil and Natural Gas Industry

Dear Ms. Dunham:

The American Petroleum Institute (API) requests that EPA withdraw and revisit the *Control Techniques Guidelines for the Oil and Natural Gas Industry* (CTGs), released on October 27, 2016.¹ API represents over 625 oil and natural gas companies, leaders of a technology-driven industry that supplies most of America's energy, supports more than 9.8 million jobs and 8 percent of the U.S. economy, and, since 2000, has invested nearly \$2 trillion in U.S. capital projects to advance all forms of energy, including alternatives. Many of our members will be negatively impacted by the CTGs if adopted by the states in their current form.

EPA's own data show that industry has been reducing methane emissions while at the same time dramatically increasing production. EPA's GHG inventory shows that methane emissions from hydraulically-fractured natural gas wells have fallen nearly 79 percent since 2005 and that total methane emissions from natural gas systems are down 16 percent between 1990 and 2015. Natural gas production from the same period is up 55 percent. Furthermore, EPA data indicate that total US emissions of Volatile Organic Compounds, which the CTGs are ostensibly designed to address, have already decreased by 41 percent since 1990 under the current rules. These trends are indicative of what our industry has achieved; both improving the environment and bolstering our nation's energy security.

Executive Order 13783, Promoting Energy Independence and Economic Growth, highlights the importance of domestic energy production. The Executive Order requires executive departments and agencies to review existing regulations "that potentially burden the development or use of domestically produced energy resources ..." and to "appropriately suspend, revise, or rescind those that unduly burden the development of domestic energy resources..." The 2016 CTGs are clearly an agency action that "burdens the development and use of domestically produced energy resources." They are also

¹ 81 FR 74798

fundamentally flawed because they mirror the requirements of the NSPS 0000a final rule, which was intended to identify cost-effective controls for new sources, and fail to take into account the increased costs associated with retrofitting existing sources.

Failure to withdraw the CTGs will unfairly burden both states and industry:

- 1) States will be burdened with rewriting the CTGs to make them cost-effective for existing sources, for which the cost-effectiveness is far different than that of new sources, and
- 2) Industry could face cost-ineffective controls in states that fail to significantly modify the CTGs before their adoption.

Furthermore, now that EPA has announced its plans to reconsider the NSPS, any adoption of the CTGs by the states is premature.

Withdrawal of the 2016 CTGs will allow time for EPA to revisit the final CTGs to better address the issues raised by API and others during their development (see our attached comments from 2016 on the proposed CTGs). Until then, these guidelines could burden state and industrial resources and hamper the development of domestically produced energy resources.

Please feel free to contact me if you have questions or need more information.

Sincerely,

Howard J. Feldman

Attachment