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*Submitted electronically to [www.regulations.gov](http://www.regulations.gov)*

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Climate Change Division  
Office of Atmospheric Programs (MC-6207-A)  
US Environmental Protection Agency  
1200 Pennsylvania Avenues, NW  
Washington, DC 20460

RE: Offshore Operators Committee Comments  
Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems  
Docket ID Number EPA-HQ-OAR-2023-0234

The Offshore Operators Committee (OOC) appreciates the opportunity to provide recommendations and comments on the above-captioned proposed rulemaking. The OOC is an offshore energy trade association that serves as a technical advocate for companies operating on the U.S. Outer-Continental Shelf. Founded in 1948, the OOC has evolved into the principal technical representative regarding regulation of offshore energy operations.

OOC's technical recommendations are included in the attachment. The attached comments are structured to include suggested edits in red to the proposed rule and justification for the suggested change. Comments submitted on behalf of OOC members are submitted without prejudice to any member's right to have or express different or opposing views. It is from this perspective that these recommendations have been developed.

EPA requested feedback on advanced methane monitoring technologies. The maturity levels of advanced methane monitoring technologies are variable across technology platforms and oil and natural gas sectors. While advanced methane monitoring technologies have been deployed and tested extensively onshore, offshore deployment of advanced methane monitoring technology is still challenging because equipment is typically more densely placed on a platform, weather may impact results more often and safety and environmental considerations can restrict deployment opportunities.

The OOC appreciates EPA continuing to align with the Bureau of Ocean Energy Management (BOEM) methodology and reporting frameworks for the offshore sector. We look forward to working with the agency on the important issues included in our comments as the rule is developed, published, and finalized. OOC requests a meeting with EPA staff, after the comment period closes, to review the attached technical comments, and answer any clarifying questions the agency may have regarding the information provided here.



Proposed EPA GHGRR: Subpart W Proposed Revisions  
OOC Comments

OOC requests the right to add comments or revise these comments until such time that the implementation of Methane Emissions and Waste Reduction Incentive Program is finalized. Until that time, it is impossible to provide constructive comments on EPA's implementation.

If you have any questions or require additional information, please contact me at [steve@theooc.org](mailto:steve@theooc.org) or at 832.347.3955.

Sincerely,

Steve Hamm  
Associate Director  
Offshore Operators Committee



No.	Section/Paragraph Reference	Proposed Text	Comment
1	§98.2(a)	<p>The GHG reporting requirements and related monitoring, recordkeeping, and reporting requirements of this part apply to the owners and operators of any facility that is located in the United States or under or attached to the Outer Continental Shelf (as defined in <u>43 U.S.C. 1331</u>) and that meets the requirements of either <u>paragraph (a)(1)</u>, <u>(a)(2)</u>, or <u>(a)(3)</u> of this section; and any supplier that meets the requirements of <u>paragraph (a)(4)</u> of this section:</p> <p>(1) A facility that contains any source category that is listed in Table A–3 of this subpart. For these facilities, the annual GHG report must cover stationary fuel combustion sources (<u>subpart C of this part</u>), miscellaneous use of carbonates (<u>subpart U of this part</u>), and all applicable source categories listed in Tables A–3 and A–4 of this subpart.</p> <p>(2) A facility that contains any source category that is listed in Table A–4 of this subpart and that emits 25,000 metric tons CO<sub>2</sub>e or more per year in combined emissions from stationary fuel combustion units, miscellaneous uses of carbonate, and all applicable source categories that are listed in Table A–3 and Table A–4 of this subpart. For these facilities, the annual GHG report must cover stationary fuel combustion sources (<u>subpart C of this part</u>), miscellaneous use of carbonates (<u>subpart U of this</u></p>	<p>OOC supports maintaining the 25,000 mtCO<sub>2</sub>e reporting threshold to remain consistent with the provisions of the Inflation Reduction Act.</p>



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		<p><u>part</u>), and all applicable source categories listed in Table A–3 and Table A–4 of this subpart.</p> <p>(3) A facility that in any calendar year starting in 2010 meets all three of the conditions listed in this <u>paragraph (a)(3)</u>. For these facilities, the annual GHG report must cover emissions from stationary fuel combustion sources only.</p> <p>(i) The facility does not meet the requirements of either <u>paragraph (a)(1)</u> or <u>(a)(2)</u> of this section.</p> <p>(ii) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 mmBtu/hr or greater.</p> <p>(iii) The facility emits 25,000 metric tons CO<sub>2</sub>e or more per year in combined emissions from all stationary fuel combustion sources.</p>	
2	§98.33(c)(1) §98.33(c)(1)(i) §98.33(c)(1)(ii) §98.33(c)(2) §98.33(c)(4)	Where: *** EF = Fuel-specific default emission factor for CH <sub>4</sub> or N <sub>2</sub> O, from Table C–2 of this subpart (kg CH <sub>4</sub> or N <sub>2</sub> O per mmBtu), except for natural gas-fired reciprocating internal combustion engines and gas turbines at facilities subject to subpart W of this part, which must use a CH <sub>4</sub> emission factor determined in accordance with §98.233(z)(4).	<p>The proposed text appears in 5 paragraphs in the proposed rule.</p> <p>OOC recommends that the proposed text be modified as follows:</p> <p>EF = Fuel-specific default emission factor for CH<sub>4</sub> or N<sub>2</sub>O, from Table C–2 of this subpart, <b>original equipment manufacturer information or performance test data</b> (kg CH<sub>4</sub> or N<sub>2</sub>O per mmBtu), except for natural gas-fired reciprocating internal combustion engines and gas turbines at facilities subject to</p>



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			<p>§98.233(z) in subpart W <del>of this part</del>, which must use a CH<sub>4</sub> emission factor determined in accordance with §98.233(z)(4).</p> <p><u>Rationale:</u>            Alternative emission factors may be available for certain equipment from the equipment manufacturer or from equipment testing. If those factors are available, the regulated community should have the option of using those emission factors.</p> <p>We are also clarifying that the requirement to use §98.233(z)(4) does not apply to offshore facilities located on the U.S. Outer Continental Shelf (OCS).</p>
3	§98.230(a)(1)	<p>This source category consists of the following industry segments:</p> <p>(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 processes and/or transfers such hydrocarbons to storage, transport vessels, or onshore. In addition, offshore production includes secondary platform structures connected to the platform structure via walkways, storage tanks associated with the platform structure and floating production and storage offloading equipment (FPSO). This source category does not include reporting of</p>	<p>OOC supports the current definition of “offshore facility” as written at the time the Inflation Reduction Act was passed.</p>



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		emissions from offshore drilling and exploration that is not conducted on production platforms.	
4	§98.232(b)	(b) For offshore petroleum and natural gas production, report CO <sub>2</sub> , CH <sub>4</sub> , and N <sub>2</sub> O emissions from equipment leaks, vented emission, and flare emission source types as identified by Bureau of Ocean Energy Management (BOEM) in compliance with 30 CFR 550.302 through 304 and CO <sub>2</sub> and CH <sub>4</sub> emissions from other large release events. Offshore platforms do not need to report portable emissions.	<p>OOO recommends the proposed regulatory text be modified as follows:</p> <p>For offshore petroleum and natural gas production, report CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions equipment leaks (<b>fugitive sources as defined by Bureau of Ocean Energy Management (BOEM)</b>), vented emission, and flare emission source types as identified by BOEM in compliance with 30 CFR 550.302 through 304 and CO<sub>2</sub> and CH<sub>4</sub> emissions from other large release events <b>not otherwise accounted for in the source types listed above</b>. Offshore platforms do not need to report portable emissions.</p> <p><u>Rationale:</u>          The addition of “fugitive sources” aligns with BOEM’s source descriptions and improves clarity for the regulated offshore community.</p> <p>Additionally, see recommendations in Comment #10.</p>
5	§98.233(s)(1)(i)	(i) For any reporting year that does not coincide with a BOEM emissions inventory data collection year, report the most recent published BOEM emissions inventory data referenced in 30 CFR 550.302 through 550.304. Adjust emissions based on the operating time for the facility relative to the operating time in the most recent published BOEM emissions inventory data.	<p>OOO recommends the proposed regulatory text be modified as follows:</p> <p>(i) For any reporting year that does not coincide with a BOEM emissions inventory data collection year, report the most recent <b>reported published</b> BOEM emissions inventory data referenced in 30 CFR 550.302 through 550.304. Adjust emissions based on the operating time for the facility relative</p>



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			<p>to the operating time in the most recent published BOEM emissions inventory data.</p> <p><u>Rationale:</u>            The OOC agrees with and supports these requirements except that we recommend that EPA replace “published” with “reported” to avoid delays from BOEM issuing a published emissions report for offshore. The delay in BOEM publishing data has at times exceeded a year. BOEM’s Air Quality System (AQS) reporting system has integrated QA/QC functions that assure data quality at the time of report submittal.</p> <p>In addition, EPA allows the use of “reported” data for GHG reporting during BOEM reporting years. Therefore, this recommendation also increases consistency during BOEM non-reporting years.</p>
6	§98.234(ee) Crank Case Venting	(ee) Crankcase venting. For reciprocating internal combustion engines or gas turbines, calculate annual CH <sub>4</sub> volumetric emissions from equipment leaks from components as specified in §98.233(q)(1)(i) or (ii) or (q)(1)(v)(A) that occur during a calendar year. You must use one of the methods described in paragraph (a)(1)(ii) or (iii) or (a)(2)(ii) of this section, as applicable, to conduct leak detection(s) of equipment leaks from components as specified in §98.233(q)(1)(iii) or (q)(1)(v)(B). If electing to comply with §98.233(q) as specified in §98.233(q)(1)(iv), you must use any of the methods described in paragraphs (a)(1) through (5) of this section to conduct leak detection(s) of equipment leaks from component types as specified in §98.233(q)(1)(iv) that occur during a calendar year. Inaccessible emissions sources, as defined in 40 CFR part 60, are not exempt from this subpart. If the primary leak detection method employed cannot be used to monitor	<p>OOC recommends the proposed regulatory text be modified as follows:</p> <p><u>(ee) Crankcase venting. For reciprocating internal combustion engines <del>or gas turbines</del>, calculate annual CH<sub>4</sub> volumetric emissions from equipment leaks from components as specified in §98.233(q)(1)(i) or (ii) or (q)(1)(v)(A) that occur during a calendar year. You must use one of the methods described in paragraph (a)(1)(ii) or (iii) or (a)(2)(ii) of this section, as applicable, to conduct leak detection(s) of equipment leaks from components as specified in §98.233(q)(1)(iii) or (q)(1)(v)(B). If electing to comply with §98.233(q) as specified in §98.233(q)(1)(iv), you must use any of the methods described in paragraphs (a)(1) through (5) of this section to conduct leak detection(s) of equipment leaks from component types as specified in §98.233(q)(1)(iv) that occur during a calendar year. Inaccessible emissions sources,</u></p>



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		<p>inaccessible components without elevating the monitoring personnel more than 2 meters above a support surface, you must use alternative leak detection devices as described in paragraph (a)(1) or (3) of this section to monitor inaccessible equipment leaks or vented emissions at least once per calendar year.</p>	<p><u>as defined in 40 CFR part 60, are not exempt from this subpart. If the primary leak detection method employed cannot be used to monitor inaccessible components without elevating the monitoring personnel more than 2 meters above a support surface, you must use alternative leak detection devices as described in paragraph (a)(1) or (3) of this section to monitor inaccessible equipment leaks or vented emissions at least once per calendar year.</u></p> <p><u>Rationale:</u>            References to gas turbines in "98.233(ee) Crankcase venting should be deleted.</p> <p>The proposed rule in § 98.238 Definitions states:            "Crankcase venting means the process of venting or removing blow-by from the void spaces of an internal combustion engine outside of the combustion cylinders to prevent excessive pressure build-up within the engine. This does not include ingestive systems that vent blow-by into the engine where it is returned to the combustion process."</p> <p>Rationale: Turbine engines do not have cylinders, or a crankcase as described in the above definition. Therefore, the "crankcase venting" is not applicable to turbine engines.</p>
7	§98.236(aa)(2) and (ii) (iii)	<p>(ii) The quantity of crude oil produced from producing wells that is sent to sale in the calendar year, in barrels. (iii) The quantity of condensate produced from producing wells that is sent to sale in the calendar year, in barrels.</p>	<p>OOO recommends the proposed regulatory text be modified as follows:</p> <p>(ii) The <b>total</b> quantity of <del>crude</del>-oil produced from producing wells that is sent to sale in the calendar year, in barrels. <del>(iii) The quantity of condensate produced from producing wells that is sent to sale in the calendar year, in barrels.</del></p> <p><u>Rationale:</u></p>





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			<p>To be consistent with the Inflation Reduction Act (IRA) and BSEE reporting, OOC proposes for oil and condensate volumes to have combined reporting. Oil and condensate production is sent onshore via single combined pipelines.</p> <p>The IRA does not differentiate between oil, condensate, and natural gas. BSEE does not differentiate between oil, condensate, and natural gas. Offshore operators report offshore production as either oil or natural gas.</p> <p>In addition, Subpart A defines “sales oil” as produced crude oil or condensate measured at the production lease automatic custody transfer (LACT) meter or custody transfer tank gauge. LACT meters are installed on an offshore platform to measure the volume of oil sent to the pipeline. They do not measure oil or condensate separately.</p>
8	§98.236(aa)(2) and (vi), (v), (vi)	<p>(iv) For each well permanently shut- in and plugged during the calendar year, the quantity of natural gas produced that is sent to sale in the calendar year, in thousand standard cubic feet.</p> <p>(v) For each well permanently shut-in and plugged during the calendar year, the quantity of crude oil produced that is sent to sale in the calendar year, in barrels.</p> <p>(vi) For each well permanently shut- in and plugged during the calendar year, the quantity of condensate produced that is sent to sale in the calendar year, in barrels.</p>	<p>OOO recommends the proposed regulatory text be removed as follows:</p> <p><del>(iv) For each well permanently shut- in and plugged during the calendar year, the quantity of natural gas produced that is sent to sale in the calendar year, in thousand standard cubic feet.</del></p> <p><del>(v) For each well permanently shut- in and plugged during the calendar year, the quantity of crude oil produced that is sent to sale in the calendar year, in barrels.</del></p> <p><del>(vi) For each well permanently shut- in and plugged during the calendar year, the quantity of condensate produced that is sent to sale in the calendar year, in barrels.</del></p> <p><u>Rationale:</u></p>



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			<p>Prior to permanently shutting in and plugging a well, production of oil or gas will be reported as a part of total sales which includes multiple wells producing on an offshore platform. Once a well is plugged, production ceases for that well, but production continues for others which would continue to be reported as total sales. Therefore, these requirements are unnecessary and overly burdensome.</p>
9	§98.236	<p>y. <i>Other large release events.</i> You must indicate whether there were any other large release events from your facility during the reporting year and indicate whether your facility was notified of a potential super-emitter release under the provisions of §60.5371b of this chapter or an applicable approved state plan or applicable Federal plan in part 62 of this chapter. If there were any other large release events, you must report the total number of other large release events from your facility that occurred during the reporting year and, for each other large release event, report the information specified in paragraphs (y)(1) through (10) of this section. If you received a notification of a potential super-emitter release from a third-party for this facility or a super-emitter release notification under the provisions of §60.5371b of this chapter or an applicable approved state plan or applicable Federal plan in part 62 of this chapter, you must also report the information specified in paragraph (y)(11) of this section.</p>	<p>OOC recommends the proposed regulatory text be modified as follows:</p> <p>y. <i>Other large release events.</i> You must indicate whether there were any other large release events from your facility during the reporting year and indicate whether your facility was notified of a potential super-emitter release under the provisions of §60.5371b of this chapter or an applicable approved state plan or applicable Federal plan in part 62 of this chapter, <b>for those facilities who are subject to these provisions.</b> If there were any other large release events <b>calculated in accordance with 98.233(y)</b>, you must report the total number of other large release events from your facility that occurred during the reporting year and, for each other large release event, report the information specified in paragraphs (y)(1) through (10) of this section. If you received a notification of a potential super-emitter release from a third-party for this facility or a super-emitter release notification under the provisions of §60.5371b of this chapter or an applicable approved state plan or applicable Federal plan in part 62 of this chapter, you must also report the information specified in paragraph (y)(11) of this section.</p> <p><u>Rationale:</u>        OOC recommends amending this requirement to clarify 3<sup>rd</sup> party notification of events under the currently-proposed</p>



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			Super-Emitter Response Program is not applicable to offshore facilities on the U.S. OCS since these events would only apply to facilities potentially subject to NSPS OOOOb or the applicable approved State plan or applicable Federal plan in 40 CFR 62.
10	§98.236(y)	<p>(1) You must report emissions for other large release events that emit GHG at or above any applicable threshold listed in paragraphs (y)(1)(i) or (ii) of this section considering the entire event duration. The thresholds listed in paragraphs (y)(1)(i) or (ii) of this section are not limited to the emissions that occur within a given reporting year. (i) For sources not subject to reporting under paragraphs (a) through (s), (w), (x), (dd), or (ee) of this section (such as but not limited to a fire, explosion, well blowout, or pressure relief), a release that either: (A) Emits methane at any point in time at a rate of 100 kg/hr or greater; or (B) Emits combined GHG across the entire event duration of 250 metric tons of CO<sub>2</sub>e or more. (ii) For sources subject to reporting under paragraphs (a) through (s), (w), (x), (dd), or (ee) of this section, a release that emits GHG at or above at least one of the thresholds listed in paragraphs (y)(1)(ii)(A) or (B) of this section. For a release meeting the criteria in either paragraph (y)(1)(ii)(A) or (B) of this section, you must report the emissions as an other large release event and exclude the emissions from this release in the source-specific emissions calculated under paragraphs (a) through (s), (w), (x), (dd), or (ee) of this section, as applicable. (A) Emits methane at any point in time at a rate of 100 kg/hr or greater in excess of the emissions calculated from the source using the applicable methods under paragraphs (a) through (s), (w), (x), (dd), or (ee) of this section; or (B) Emits combined GHG across the entire event duration of 250 metric tons of CO<sub>2</sub>e or more in excess of the emissions</p>	<p>OOO recommends the proposed regulatory text be modified as follows:</p> <p>(1) You must report emissions for other large release events that emit GHG at or above any applicable threshold listed in paragraphs (y)(1)(i), (ii), <b>or (iii)</b> of this section considering the entire event duration. The thresholds listed in paragraphs (y)(1)(i), (ii), <b>or (iii)</b> of this section are not limited to the emissions that occur within a given reporting year.</p> <p>(i) For sources not subject to reporting under paragraphs (a) through <del>(r)</del> (s), (w), (x), (dd), or (ee) of this section (such as but not limited to a fire, explosion, well blowout, or pressure relief), a release that <b>either</b>: (A) Emits methane at any point in time at a rate of 100 kg/hr or greater; <del>or</del> <b>and</b> (B) Emits combined GHG across the entire event duration of 250 metric tons of CO<sub>2</sub>e or more.</p> <p>(ii) For sources subject to reporting under paragraphs (a) through <del>(r)</del> (s), (w), (x), (dd), or (ee) of this section, a release that emits GHG at or above at least one of the thresholds listed in paragraphs (y)(1)(ii)(A) <del>or</del> <b>and</b> (B) of this section. For a release meeting the criteria in either paragraph (y)(1)(ii)(A) or (B) of this section, you must report the emissions as an other large release event and exclude the emissions from this release in the source-specific emissions calculated under paragraphs (a) through <del>(r)</del> (s), (w), (x), (dd), or (ee) of this section, as applicable. (A) Emits methane at any point in time</p>



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		<p>calculated from the source using the applicable methods under paragraphs (a) through (s), (w), (x), (dd), or (ee) of this section.</p>	<p>at a rate of 100 kg/hr <del>or</del> and greater in excess of the emissions calculated from the source using the applicable methods under paragraphs (a) through (r) <del>(s)</del>, (w), (x), (dd), or (ee) of this section; <del>or</del> and (B) Emits combined GHG across the entire event duration of 250 metric tons of CO<sub>2</sub>e or more in excess of the emissions calculated from the source using the applicable methods under paragraphs (a) through (r) <del>(s)</del>, (w), (x), (dd), or (ee) of this section.</p> <p>(iii) For sources subject to reporting under paragraph (s) of this section, a release that emits GHG at or above the thresholds listed in paragraphs (y)(1)(iii)(A) <del>or</del> and (B) of this section not otherwise accounted for within the calculation methodologies in paragraph (s). For a release meeting the criteria in paragraph (y)(1)(iii)(A) <del>or</del> and (B) of this section not otherwise accounted for within the calculation methodologies in paragraph (s), you must report the emissions as an other large release event. (A) Emits methane at any point in time at a rate of 100 kg/hr or greater; and (B) Emits combined GHG across the entire event duration of 250 metric tons of CO<sub>2</sub>e or more.</p> <p><u>Rationale:</u> As acknowledged in 98.232(b) and 98.233(s), for offshore facilities there is a regulatory program that already exists to capture the majority of other large release events. Therefore, we are providing this recommendation to clarify reporting of other large release events for offshore facilities such that only events that are not captured by BOEM’s methods are reported as a large release. Additionally, excluding emissions from these releases from source-specific emissions could potentially dilute the data associated with source-specific emissions. For example, turnaround venting</p>



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			would be accounted for in cold vent emissions either reported to BOEM or calculated in accordance with those methods.
11	§98.238	<p>Other large release event means any planned or unplanned uncontrolled release to the atmosphere of gas, liquids, or mixture thereof, from wells and/or other equipment that result in emissions for which there are no methodologies in §98.233 other than under §98.233(y) to appropriately estimate these emissions. Other large release events include, but are not limited to, well blowouts, well releases, pressure relief valve releases from process equipment other than hydrocarbon liquids storage tanks, storage tank cleaning and other maintenance activities, and releases that occur as a result of an accident, equipment rupture, fire, or explosion. Other large release events also include failure of equipment or equipment components such that a single equipment leak or release has emissions that exceed the emissions calculated for that source using applicable methods in §98.233(a) through (s), (w), (x), (dd), or (ee) by the threshold in §98.233(y)(1)(ii).</p>	<p>OOO recommends the proposed regulatory text be modified as follows:</p> <p>Other large release event means any planned or unplanned uncontrolled release to the atmosphere of gas, liquids, or mixture thereof, from wells and/or other equipment that result in emissions for which there are no methodologies in <b>Bureau of Ocean Energy Management (BOEM) 30 CFR 550.302 through 304 for offshore operators</b>, or §98.233 other than under §98.233(y) to appropriately estimate these emissions. Other large release events include, but are not limited to, well blowouts, well releases, pressure relief valve releases from process equipment other than hydrocarbon liquids storage tanks, storage tank cleaning and other maintenance activities, and releases that occur as a result of an accident, equipment rupture, fire, or explosion. Other large release events also include failure of equipment or equipment components such that a single equipment leak or release has emissions that exceed the emissions calculated for that source using applicable methods in §98.233(a) through (s), (w), (x), (dd), or (ee) by the threshold in §98.233(y)(1)(ii) <b>or (iii)</b>.</p> <p><u>Rationale:</u>          We are providing this recommendation to clarify the definition of other large release events for offshore facilities to specifically exclude events that are captured by BOEM’s methods 30 CFR 550.302 through 304.</p>



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12	Footnote to Table C-2	Reporters subject to subpart W of this part may only use the default CH <sub>4</sub> emission factor for natural gas-fired combustion units that are not reciprocating internal combustion engines or gas turbines. For natural gas-fired reciprocating internal combustion engines or gas turbines, at facilities subject to subpart W of this part, reporters must use a CH <sub>4</sub> emission factor determined in accordance with §98.233(z)(4).	<p>Reporters subject to §98.233(z) in subpart W <del>of this part</del> may only use the default CH<sub>4</sub> emission factor for natural gas-fired combustion units that are not reciprocating internal combustion engines or gas turbines. For natural gas-fired reciprocating internal combustion engines or gas turbines, at facilities subject to §98.233(z) in subpart W <del>of this part</del>, reporters must use a CH<sub>4</sub> emission factor determined in accordance with §98.233(z)(4).</p> <p><u>Rationale:</u>          We are clarifying that the requirement to use §98.233(z)(4) does not apply to offshore facilities located on the U.S. OCS.</p>
13	GHGRP Technical Support Document; 14.2  Also reference section of preamble that discusses pipeline quality gas...	<p>“Stakeholders have expressed several concerns about these provisions, and one concern in particular is evaluated and analyzed in this TSD. Reporters have indicated in questions submitted to the GHGRP Help Desk that the term “pipeline quality” is not defined in Subpart W, but pipeline quality specifications vary across the U.S. depending on the requirements of the pipeline used to transport the gas.”</p>	<p>OOC does not recommend using the term “pipeline quality gas” in any part of Subpart W for the reasons stated in the Technical Support Document. We support the continued use of the term “natural gas” in Tables C-1 and C-2. Table C-1 and Table C-2 reference natural gas only. These tables do not differentiate pipeline quality gas.</p> <p>The definition of “Natural gas” in Subpart W reads “may be field quality, pipeline quality, or process gas”. Therefore, the use of the term “natural gas” is appropriate.</p>
14	De-minimus threshold and timeframe must be established for errors to be considered substantive.	Not applicable.	<p>OOC supports section 2.2 in American Petroleum Institute’s (API) Subpart W comment letter, which requests that a threshold be developed by which an error is to be considered substantive, in lieu of the current broad definition. Specifically, OOC is requesting that EPA:</p> <p>1) Determine a de-minimus ‘substantive error’ threshold for methane emissions that excludes administrative errors that could result in a re-submittal. OOC suggests a threshold of 5% of facility-wide reported methane emissions.</p>



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			<p>2) Limit the timeframe in which EPA can determine that a 'substantive error' has occurred to no more than 3 years. 3) Limit EPA's validation of re-submitted reports to only the requested revision.</p> <p>As methane fees become associated with submitted reports, it will become extremely burdensome to adjust previously submitted payments for changes in a report which could result in very small financial adjustments. The suggested timeframe of 3 years is consistent with the record retention requirement in 40 CFR 98.3.</p>