



April 22, 2015

Gina McCarthy
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

RE: Comments of the American Exploration and Production Council -- Oil and Natural Gas Sector: Definitions of Low Pressure Gas Well and Storage Vessel; Proposed Rule; Docket ID No. EPA-HQ-OAR-2010-0505.

Dear Mrs. McCarthy:

American Exploration and Production Council ("AXPC") appreciates this opportunity to comment on the U.S. Environmental Protection Agency's ("EPA" or the "Agency") proposed amendments to the New Source Performance Standards ("NSPS") for the oil and natural gas sector, published as "Oil and Natural Gas Sector: Definitions of Low Pressure Gas Well and Storage Vessel," dated March 23, 2015 (80 Fed. Reg. 55, 15180).

The American Exploration & Production Council ("AXPC") is a national trade association representing 30 of America's largest and most active independent oil and natural gas exploration and production companies. AXPC members are "independent" in that their operations are limited to exploration for and production of oil and natural gas. Moreover, our members operate autonomously, unlike their fully integrated counterparts, which operate in additional segments of the energy business, such as downstream refining and marketing. AXPC members are leaders in developing and applying innovative and advanced technologies necessary to explore for and produce oil and natural gas, both offshore and onshore, from unconventional sources.

AXPC fully supports the proposed changes to §60.5395(e)(4) and to the definition of a storage vessel in §60.5430. We agree with the concerns that the Gas Processors Association (GPA) raised in their petition for administrative reconsideration regarding the definition of a storage vessel affected facility (February 19, 2015) and believe that this correction addresses that concern. Since it was first adopted, NSPS OOOO has consistently made clear that a "storage vessel affected facility" is an individual storage tank and that potential to emit calculations and applicability determinations are made on an individual tank-by-tank basis, even when such tanks may be manifolded together.¹ These corrections reinstate that understanding and reflect the original intent of the rule.

¹ See EPA 2012 Response to Comments, at 104 ("The final rule applies only to individual storage vessels with annual VOC emissions of 6 tpy or greater.").

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Again, AXPC appreciates the opportunity to provide these comments. In the event you have questions or require additional information, please feel free to contact me at 202-742-4541 or by email at bthompson@axpc.us. Thank you in advance for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "V. Bruce Thompson". The signature is written in a cursive style with a large, stylized "V" and "B".

V. Bruce Thompson
President
American Exploration and Production Council

Cc: Bruce Moore