

September 13, 2024

Jim Nyarady
Manager, Oil and Gas Section
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Pacific Gas and Electric Company Comments on the California Air Resources Board's Potential Changes to the California Oil and Gas Methane Regulation

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment on the California Air Resources Board's (CARB) *Public Workshop on Potential Changes to the California Oil and Gas Methane Regulation* (Workshop) held on August 15, 2024. PG&E would like to thank CARB for its continued efforts to reduce methane emissions from the oil and natural gas industry, in support of the State's greenhouse gas (GHG) reduction goals.

PG&E's comments include initial feedback on the potential changes as well as identifying areas where additional details and context are needed. The references below are listed in chronological order from the Staff Presentation followed by additional topics for CARB's consideration.

1. Convert to all zero-emitting pneumatics/process controllers

PG&E requests clarification regarding whether the proposed changes refer to converting both continuous low-bleed pneumatic controllers and intermittent bleed pneumatic controllers. PG&E also encourages CARB to carefully consider the costs of equipment conversions compared to the potential emissions reductions.

The emissions associated with pneumatic bleed devices from all of PG&E's Mandatory Reporting Rule (MRR) facilities represent less than 1% of PG&E's overall methane emissions portfolio under GHG MRR. The actual emissions resulting from pneumatic bleed devices within PG&E's facilities are negligible considering that the current reported emissions are calculated based on a conservative emission factor as well as full year of service assumption. Converting all pneumatic bleed devices to zero-emitting pneumatics controllers within PG&E facilities is costly and burdensome while resulting in minimal emissions reductions.

PG&E recommends maintaining the use of existing continuous low-bleed and intermittent bleed pneumatics controllers. One alternative could be that full replacements of pneumatics controllers require new zero-emitting continuous and intermittent bleed pneumatics controllers. At a minimum, any conversion or replacement requirements should consider the critical nature of these facilities for reliability, especially in remote areas.

2. Ban associated gas venting (no open well casing vents)

PG&E requests further clarification on this potential requirement such that it takes into consideration the operating conditions that require the opening of well casing vents. The proposed ban could result in integrity risks and operational outages. In circumstances where the well casing pressure threshold is exceeded, the opening of well casing vents is a critical and regulated procedure by the California Geologic Energy Management (CalGEM) division. This practice is essential in order to perform diagnostic testing and mitigate potential integrity risks, thus ensuring the continued safety and functionality of the facility.

3. Lower LDAR leak concentration to 500 ppm

The proposed changes to lower the LDAR leak concentration should consider operator feedback and the overall impact on emissions reductions. The removal of the prior exemption that the rule provided for components less than one-and-a-half inch in diameter has greatly expanded the scope of LDAR survey. If the LDAR leak concentration were to be lowered to 500 ppm, PG&E would like to request a reasonable timeline to implement this change such that hiring and training of additional personnel can take place. PG&E also requests CARB to consider the costs associated with the addition of personnel.

Based on PG&E's LDAR experience, leak concentration can be affected by weather conditions, such as temperature, which could result in leak concentration oscillations. With the current 1,000 ppm thresholds, some components might be found leaking one day, but then found not leaking the next day due to weather conditions. Lowering the leak concentration to 500 ppm would potentially cause a substantial increase in the number of leaks that need to be tracked.

4. Additional LDAR requirements for gas processing plants

No comments.

5. Allow alternative LDAR approaches that achieve equivalent or better emissions reductions

PG&E requests that CARB provide additional details on potential "alternative LDAR approaches that achieve equivalent or better emissions reductions."

6. Ban or minimize emissions from liquids unloading

No comments.

7. Limit emissions from centrifugal compressor dry seals

PG&E requests CARB provide additional details.

8. Expand Audio, Visual, Olfactory (AVO) inspections

PG&E has not identified any issues with the current AVO inspection requirements. PG&E requests that CARB provide additional detail on what the expansion of AVO inspections could entail and the justification for such an expansion.

9. Require additional recordkeeping and reporting

PG&E requests CARB provide further detail on this topic.

10. Require operator compliance plans, notifications of compliance, and well closure plans

PG&E requests clarification on what “closure” is referring to in the proposed change. Are well closure plans akin to well abandonment plans? If so, PG&E notes that there are currently requirements in place for well abandonment plans under CalGEM’s jurisdiction.

11. Revisit separator and tank system emission estimation methods and limits

PG&E requests CARB provide additional insight and detail on this topic.

12. Additional Changes to Consider

PG&E requests an additional delay of repair scenario listed under §95670.1 for safety related delays. If a situation arises between the time when a leak is identified and when a repair can be successfully made that deems a component unsafe to repair, PG&E requests that a delay of repair be considered and approved by CARB. Upon the return of safe conditions, the repair may be made. Currently, there is not a delay of repair scenario for when a safety issue arises.

PG&E appreciates the opportunity to provide these comments on the Workshop and looks forward to continued collaboration with CARB staff on the forthcoming amendments. Please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

Jennifer Privett
State Agency Relations
Pacific Gas and Electric Company