



September 13, 2024

Submitted via <https://ww2.arb.ca.gov/public-comments/public-feedback-potential-changes-oil-and-gas-methane-regulation-implement-u-s-epas>

Jim Nyarady, Manager of the Oil and Gas Section  
 Kelly Yonn, Air Pollution Specialist  
 California Air Resources Board  
 1001 I Street  
 Sacramento, CA 95814

Re: Potential Changes to the Oil and Methane Regulation to Implement U.S. EPA's Emission Guidelines

Dear Mr. Nyarady and Ms. Yonn:

We submit these comments to the California Air Resources Board (CARB) on behalf of FracTracker Alliance, the Central California Environmental Justice Network, Sierra Club, the Central Valley Air Quality Coalition, The Climate Center, Labor Network for Sustainability, Committee for a Better Arvin, Comite por un Shafter Mejor, Oil and Gas Action Network (OGAN), the Center on Race Poverty and the Environment, Sunflower Alliance, Comite Progreso de Lamont, Clean Water Action, Stand.earth, Physicians for Social Responsibility- Los

Angeles, Climate First: Replacing Oil & Gas (CFROG), Friends of the Earth US, 350 Bay Area Action, Central California Asthma Collaborative, California Nurses for Environmental Health, Food & Water Watch and Justice, Leadership Counsel for Justice and Accountability, Greenpeace USA, and Voices in Solidarity Against Oil in Neighborhoods in connection with CARB's request for input into potential amendments to California's Oil and Gas Methane Regulation. These comments highlight opportunities for regulation improvement given CARB's missions to:

- Reduce methane to mitigate the worst effects of climate change,
- Protecting public health by reaching National Ambient Air Quality Standards, and
- Protecting our ecological resources.

We urge CARB in this rulemaking process to eliminate regulatory exemptions, including the following:

1. The heavy oil exemption, both from standards and leak detection and repair (LDAR) requirements,
2. The wellhead-only exemption from LDAR requirements,
3. The zero-bleed/zero-emission standards exemption for certain pneumatic devices, and
4. The vapor recovery exemption for low-throughput separators and condensate tank systems (also known as the "small producer" exemption).

We also support the adoption of additional measures designed to protect frontline communities from harmful air pollution and reduce greenhouse gas emissions.

### **General Recommendations**

#### *Comply As Early As Possible*

Given the number of California National Ambient Air Quality Standard (NAAQS) attainment date failures and extension requests and approvals, we request CARB proposes earlier than required dates for all requirements related to the EPA's Emission Guidelines timeline. The existing COGR infrastructure is already in place, and CARB should not need the entire time allowed by EPA to perform a regulation update. Similarly, the California Oil and Gas Industry is already complying with COGR and does not need until July 2028 in order to comply. Any reduction in the timeline will assist CARB in their efforts to reach NAAQS attainment requirements. CARB has also already shown a shorter regulation update timeline can be achieved by its work on the 2023 COGR update as listed below:

- Public Workshop: Sept 2022
- Draft Rule Text: Jan 2023 (4 months later)
- CARB Board Approval: June 2023 (5 months later)

Applying the above, proven time results in the recommended timeline below:

- Public Workshop: August 2024
- Draft Rule Text: December 2024 (5 months sooner than currently proposed)
- CARB Board Approval: May 2025 (5 months sooner than currently proposed)

*Cite Fact-Based Claims or Include References*

When methane emissions are shown in charts or tables, whether actual annual emissions or percentages, in future presentations and staff reports, we request CARB includes enough reference material or citations for members of the public to investigate the source of the data and its calculation methodology. The pie chart on slide 6 of the public workshop presentation included no reference. CARB staff directed attendees of the workshop to the 2022 Scoping Plan. On page 245 of the Final 2022 Scoping Plan document, a similar pie chart is shown, but again, includes no reference.<sup>1</sup> Similar charts and tables were included in past staff reports without references also. The public should be provided with this information by default instead of having to inquire and submit public records act requests, which would be fulfilled after the rulemaking has been completed.

*More Stringent Requirements in Nonattainment Areas*

While we agree the oil and gas industry in California should be regulated the same regardless of location, increased regulations are more important in areas of nonattainment. Therefore, if during the rule updating process, CARB is opposed to any optional increased controls, we encourage CARB to consider implementing these more stringent requirements in nonattainment areas only.

*Initiate Local Air District Rulemaking*

In the 2023 COGR update, CARB was required to coordinate with local Air Districts to ensure local air district rules were also updated to comply with EPA-required changes for inclusion in the State Implementation Plan (SIP). Based on the updates required to comply with EPA's Emission Guidelines, this scenario will happen again. Therefore, we urge CARB to proactively identify the areas in local air district rules that will be required to be changed for future inclusion into the SIP. Failing to satisfy these requirements now will only require additional work when EPA eventually provides partial approval and partial disapproval again.

*Remove Exemptions*

While we would like to see all exemptions be removed, we believe CARB will continue to include some exemptions. We encourage CARB to review their 2023 COGR update presentation in which it was estimated that all costs over a five-year period for the proposed amendments only amounted to 0.02% of industry sales in sectors covered by the regulation over the same period of time. This strongly states the cost to implement updated controls or controlling previously unregulated operations by removing exemptions can be significantly increased and still remain very cost effective.

A potential compromise in this area would be to not allow exemptions or significantly reduce exemption thresholds in areas of nonattainment or areas of nonattainment that have missed an attainment date and have requested an extension. This would help ensure the areas with the worst air quality and most difficulty in reaching attainment receive additional help through COGR.

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<sup>1</sup> <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>, p. 245.

### Heavy Oil Exemption Removal

Comments from CARB staff in oil and gas conversations have indicated a desire to update emission rates for heavy oil. We are concerned CARB is interested in such information in order to propose an alternative plan to EPA in which heavy oil is not exempt. We strongly urge CARB to discontinue efforts to retain the heavy oil exemption:

1. EPA already spent considerable time and resources on the Emission Guidelines because they do not agree with a heavy oil exemption.
2. The minuscule cost to industry in the 2023 update shows industry should be investing more in controlling their emissions.
3. The air quality and continued nonattainment status in areas of California is past the point of allowing these emissions to go un-regulated, un-monitored, and un-repaired.

A decision to retain the heavy oil exemption is confirmation CARB places Industry profits above public health.

We would like to add that we still have not been provided with the specific location or documentation showing the emission factors for heavy oil or previous emissions calculations by CARB justifying the heavy oil exemption. CARB staff continue to say they are available online, but we cannot locate them and request your assistance.

### Unregulated Oil and Gas Areas

In future presentations and reports, we ask that CARB also identifies unregulated areas of the oil and gas sector in support of full transparency. Slide 11 of the public workshop presentation lists current regulatory requirements. However, an uninformed member of the public or even Governing Board member may not be as familiar with the Oil and Gas Sector and have no idea of the types of emissions not being shown. Therefore, we recommend future documents highlight ALL emission sources and then specify what sources are being regulated and what sources are not and why.

### Additional Public Workshop

CARB's proposed timeline does not include a public workshop after the proposed regulatory package is released. Written comments are one sided conversations without the ability to dialogue. Additionally, CARB's decision to limit public comment to 2 minutes essentially eliminates the ability to comment on a complex topic. Therefore, we request CARB hold a second public workshop after the draft rule is released to hear public comment, concerns, and questions. We ask that CARB be present and converse for a 2-3 hour period.

### Leak Detection and Repair (LDAR)

As justification for eliminating the LDAR exemptions noted at the beginning of this letter, we hereby incorporate by reference the attached comments submitted to the U.S. Environmental Protection Agency on June 3, 2024, in connection with California's State Implementation Plan for ozone and the Clean Air Act's requirement that operators use reasonably available control technology to control fugitive emissions of volatile organic compounds (VOCs) from oil and gas sites.

The above-referenced comments highlight a recent analysis by FracTracker Alliance of California's 65,000 unplugged oil and gas production wells, showing that 80 percent reported production of heavy oil.<sup>2</sup> In other words, the heavy oil exemption swallows the rule. FracTracker also documented that wellhead-only sites have been a significant source of leaks identified by community scientists in California using optical gas imaging (OGI) technology, as these sites still contain fugitive emissions components,<sup>3</sup> underscoring the importance of subjecting wellhead-only sites to LDAR requirements.

In addition, we refer you to the report recently released by the California Oil and Gas Public Health Rulemaking Scientific Advisory Panel (Panel), convened by the California Geologic Energy Management Division and comprised of more than a dozen illustrious members who unanimously recommended the removal of the pneumatic device exemption, "small producer" exemption for separators and condensate tank systems, and heavy oil exemption, and cautioned against delaying regulatory action "to reduce exposure to [oil and gas development]-related hazards."<sup>4</sup>

In particular, the Panel recognized that methane is a "co-pollutant[]" with non-methane VOCs (NMVOCs) such as n-hexane, benzene, ethylbenzene, toluene, and xylenes, and stated in Finding 4.4 that "[t]he closure of the exemptions from statewide zero-bleed/zero-emission standards for existing low-bleed pneumatic devices and vapor recovery requirements for low-throughput separators and condensate tank systems... would reduce NMVOC emissions by an estimated 15 tons per year (tpy) from 50 existing natural gas-powered pneumatic devices and 208 tpy from ~2,200 small throughput separator and tank systems."<sup>5</sup>

The panel concluded that emissions from heavy oil, pneumatic devices, and low-throughput separators and condensate tank systems "may be meaningful [to] risk of NMVOC exposure in areas with concentrated exempt infrastructure or when this infrastructure exists in close proximity to human populations."<sup>6</sup> Accordingly, the Panel made the following recommendation,<sup>7</sup> which we hereby endorse:

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<sup>2</sup> Letter from Kyle Ferrar, Western Program Director, FracTracker Alliance Re: Expert Witness Comments on Scope of U.S. EPA State Implementation Plan of RACT Requirements for Oil and Gas Sites at 2 (June 3, 2024).

<sup>3</sup> *See id.* at 4, Appendix B (documenting leaking wellheads in the Bakersfield and Morningstar areas of Kern County in June 2022, including pictures indicating the location on the wellheads where the leaks occurred).

<sup>4</sup> Seth Shonkoff et al., *Public Health Dimensions of Upstream Oil and Gas Development in California: Scientific Analysis and Synthesis to Inform Science-Policy Decision Making*, California Oil & Gas Public Health Rulemaking Scientific Advisory Panel at ES-16 & 3-95 (June 21, 2024), [https://www.conservation.ca.gov/calgem/Documents/Public%20Health%20Panel%20Final%20Report\\_20240621.pdf](https://www.conservation.ca.gov/calgem/Documents/Public%20Health%20Panel%20Final%20Report_20240621.pdf).

<sup>5</sup> *Id.* at ES-15.

<sup>6</sup> *Id.* at ES-15 to ES-16.

<sup>7</sup> *Id.* at ES-16.

**Recommendation 4.1.** Enforced vapor recovery and LDAR regulations provide tools to enhance detection and reductions of emissions of methane and NMVOCs, including toxic air contaminants and ozone precursors to the atmosphere. Deploy measures to reduce emissions of toxic air contaminants, and ozone precursors associated with new and existing upstream oil and gas development. These measures include, but are not limited to, the following LDAR and emission control measures:

- Require zero-bleed/zero-emission all pneumatic devices across upstream oil and gas development operations regardless of when they were installed. The Colorado Department of Public Health and the Environment's Air Quality Control Commission's updated *Regulation Number 7: Control of Ozone via Ozone Precursors and Control of Hydrocarbons via Oil and Gas Emissions (Emissions of Volatile Organic Compounds and Nitrogen Oxides)* includes requirements for the use of zero-bleed and zero-emission pneumatic control devices at oil and gas well sites, both for new and modified sources as well as for existing sources, retroactively. This Colorado rule provides precedent and guidance for updated rules in California.
- Remove the "small producer" exemptions for separators and condensate tank systems and require them to comply with the 95% vapor control standard, both at the local and regional district levels and within California's Oil and Gas Methane Regulation.
- Remove the heavy oil exemption (crude oil with API gravity <20) from California's Oil and Gas Methane Regulation Leak Detection & Repair (LDAR) requirements.

Additionally, the Panel's report implicitly supports elimination of the wellhead-only exemption by recognizing that "certain infrastructure components, such as wellheads . . . have emission profiles with high methane/non-methane hydrocarbon (NMHC) ratios."<sup>8</sup>

Finally, we support the following air quality-related recommendations in the Panel's report as relevant to California's Oil and Gas Methane Regulation:

- Recommendation 2.1, to "[r]equire regular sampling and reporting of the composition of gas releases from upstream oil and gas development, hydrocarbon storage, and associated infrastructure including, but not limited to, the gas in the production string of wells; gas pre- and post-glycol dehydration, gases and vapors in condensate tanks; gas in gasgathering lines and associated infrastructure; gas in gas-processing plants; and gas in idle, abandoned, and idle-deserted oil and gas wells";<sup>9</sup>
- Recommendation 4.2, for air quality monitoring and LDAR plans to encompass toxic air contaminants, ozone precursors, and other pollutants of concern beyond just methane, based on the recognition that "Methane may be a useful surrogate for TACs and other pollutants of concern . . . from infrastructure that contains gases with high methane/non-methane hydrocarbon ratios, but is not appropriate as a surrogate when monitoring infrastructure containing gases with lower methane:nonmethane hydrocarbon ratios";<sup>10</sup>
- Recommendation 6.2, for "[s]ites with idle-deserted or abandoned infrastructure that is sited in areas slated for redevelopment" to "undergo relevant environmental testing, including studies to assess methane and non-methane volatile organic compound flux";<sup>11</sup> and

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<sup>8</sup> *Id.* at ES-14 to ES-15.

<sup>9</sup> *Id.* at ES-11.

<sup>10</sup> *Id.* at ES-16 to ES-17.

<sup>11</sup> *Id.* at ES-21.

- Recommendation 6.3, for additional studies “to assess the composition of gas contained in and emitted from abandoned, idle, and idle-deserted wells” in aid of evaluating “health hazards, risks, and impacts of emissions,” with samples “collected directly from production string, bradenhead, or other wellhead features,” and special effort made “to locate and mitigate potential super-emitters to the atmosphere or wells where lack of zonal isolation is more likely to lead to migration of gas and fluids in the subsurface.”<sup>12</sup>

Recommendations 4.2 and 6.3, above, also relate to SB 1137’s mandate (1) for operators to develop LDAR plans for any “production facility or well with a wellhead in a health protection zone,” (2) for such LDAR plans to encompass “chemical constituents, such as methane and hydrogen sulfide, as well as potential toxics of highest concern in the region,” and (3) for CARB to “adopt regulations as necessary to implement and set performance standards by regulation for the emissions detection system.”<sup>13</sup> The California legislature recently passed a law to push back operators’ compliance deadlines with SB 1137’s LDAR requirements by an additional three years.<sup>14</sup> It is imperative that CARB uses this time well—to develop and implement emergency LDAR regulations.

To date, we have seen no indication from CARB that either an emergency or regular rulemaking to implement SB 1137’s LDAR requirements is under development. We emphasize the urgent need for such protection in frontline communities in light of the Panel’s conclusion “with a high level of certainty... that there is a causal relationship between close residential proximity to upstream oil and gas development and adverse perinatal and respiratory outcomes,” and its related conclusion that “[u]pstream oil and gas development operations in California are disproportionately located in disadvantaged communities,” which “may be more vulnerable to the adverse health effects of oil and gas development due to concurrent exposures to other environmental hazards and social stressors.”

California has some of the worst air quality in the nation. Oil and gas activity is a major reason why residents are unable to breathe healthy air. CARB must take steps to better address fugitive emissions of methane and NMVOCs from *all* oil and gas production sites to ensure the protection of all Californians, especially frontline communities living near oilfields who have suffered adverse health impacts for far too long. Accordingly, we ask CARB to eliminate the pneumatic devices exemption, low-throughput separators and condensate tank systems exemption, heavy oil exemption, and wellhead-only exemption, and to promptly adopt the additional urgently needed health protection recommendation in the Panel’s report.

### **Separators and Tank System Requirements**

#### *COGR Unregulated Tanks*

Please ensure all tanks covered by the Emission Guidelines as storage vessels are accounted for in COGR. COGR only has standards for separator and tank systems [95668(a)], circulation tanks used in well stimulation treatments [95688(b)], and natural gas underground storage [95688(h)]. Informing the public of the other places tanks are used would be helpful.

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<sup>12</sup> *Id.*

<sup>13</sup> SB 1137, § 2, 2021-2022 Leg., Reg. Sess. (Cal. 2022) (enacting Pub. Res. Code § 3283(a)).

<sup>14</sup> AB 218, § 2, 2023-2024 Leg., Reg. Sess. (Cal. 2024) (amending Pub. Res. Code § 3283(a)).

The 2016 Staff Report, Appendix D stated tank system emissions were estimated using data from ARB's 2009 Oil and Gas Industry Survey.<sup>15</sup> We were unable to locate that report. We would like to ensure all methods used for estimating emissions in this update are accounting for the previously unregulated tanks that are now covered by Emission Guidelines. Please ensure the sources of information used in making these determinations are included as references in the staff report or cited.

#### Small Producer Exemption

Small producer tanks release emissions just like larger producer tanks. Vapor recovery systems are standard control equipment and should be a requirement for all tanks, regardless of throughput. As mentioned above, this would be a great area to eliminate the exemption for areas of nonattainment or areas that requested attainment date extensions.

If the small producer exemption is maintained, please add units of ton/year so COGR can be compared with the Emission Guidelines for storage vessels.

#### Floating Roofs

It appears floating roofs as control measures are only allowed if two specific criteria are met. Please include requirements in the section exempting 95688(a) that ensures allowable floating tanks are either exempt from Emission Guidelines or meet the Emission Guideline criteria for floating roofs as a control measure.

#### Local Air District Exclusions

SJVAPCD Rule 4623 appears to exempt many tanks that are not exempt from the Emission Guidelines. If Emission Guidelines apply, please ensure Rule 4623 is updated to comply with them or remove Rule 4623 from the list of options that exempt tanks from 95688(a) requirements. The SJV rule was used as an example, but all rules listed should be addressed similarly.

#### Tanks Excluded by COGR Section 95688(a)(2)

Please ensure (and show in the staff report or separate correspondence) that the remaining ways allowing tanks to not comply with 95688(a) are only allowed for tanks not required to comply with Emission Guideline storage vessel requirements.

#### Emission Calculations

Appendix C appears to only be calculating flashing emissions when determining if annual emissions require the use of a vapor collection system. EPA Emission Guidelines require flashing, working, and breathing loss emissions all be included in order to determine if control equipment is required. Please ensure calculation methodology is updated to include these other sources of emissions. Please include in supporting documentation the emission factors used and justification for those emission factors if differing from EPA information.

### **Vapor Collection Systems and Vapor Control Devices**

#### Control Equipment Cost Analysis

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<sup>15</sup> <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2016/oilandgas2016/oilgasappd.pdf>, p. 2.



We are aware CARB is often pushing the envelope for control technology and emission limits to assist in reaching NAAQS attainment levels. As an alternative for establishing a single ton per year limit for all entities, CARB could also establish a low range in which specific cost analysis submissions from owners/operators would be required to see if control equipment was cost effective.

For example, any tank batteries estimated to emit between 5 and 10 metric tons of methane per year would be required to submit a cost-effective analysis showing the cost to install a vapor recovery system and compared to the gross profits for that company from all areas. If an entity has low throughput and is therefore making little money, installing a vapor recovery system would be difficult and would show up as such. However, regardless of throughput, if a company is making larger sums of money, then installing a vapor recovery system would not cause as much of an impact and should be required. This more stringent approach could also be limited to nonattainment areas or areas that have requested attainment date extensions.

#### Fuel Gas System - Emission Guidelines Applicable

For equipment requiring vapor collection per Emission Guidelines, we do not believe routing collected vapors into a fuel gas system without exhaust limits is in compliance with Emission Guideline requirements. By definition, a fuel gas system is:

*“Fuel gas system” means, for the purposes of this subarticle, any system that supplies natural gas as a fuel source to on-site natural gas powered equipment other than a vapor control device.*

The exhaust gas of the on-site natural gas-powered equipment must be required to show that methane emissions were reduced by 95% or greater for this option to be allowed. We would recommend initial and follow up annual source testing for verification.

#### Fuel Gas System - Emission Guidelines Not-Applicable

For equipment not subject to Emission Guidelines, we still do not believe CARB should allow collected vapors to be burned in on-site combustion equipment through a fuel gas system option.

Multiple areas in California are in nonattainment for NO<sub>x</sub>, PM<sub>2.5</sub>, and VOCs. Without specific limits for the exhaust from the on-site combustion, COGR is potentially contributing to our air quality problem. While on-site combustion equipment may have emission limits in other rules or regulations, exemptions and registration requirements only are options. If CARB is to include fuel gas system combustion as an option for addressing collected vapors, specific exhaust requirements or references to specific exhaust requirements should be included within COGR.

#### Vapor Control Devices

We request CARB re-evaluates vapor control devices to ensure destructive vapor control should still be allowed, especially with a vapor control efficiency of 95% and a NO<sub>x</sub> limit of 15 ppmv.

Additionally, we request the performance test exemptions of Appendix F(a) be re-evaluated as it appears almost all do not comply with Emission Guidelines.

#### **Past CARB Comments Supporting More Stringency**

At the July 21, 2016 Governing Board Meeting, the following statements were made:

- Chief Scheehle said, “we are trying to move people to the non-combustion routes,” when discussing the use of flares as control equipment.<sup>16</sup>
- Mr. Lambert on behalf of the Air Pollution Control Officer (APCO) from the San Joaquin Valley Air Pollution Control District (SJVAPCD) made extensive comments on not increasing NOx emissions from oil and gas flaring activity. Mr. Lambert said, “we really have no tolerance for additional NOx emissions in the Valley.”<sup>17</sup>
- Mr. Lambert also stated, “flaring activities at oil and gas operations have been an area of great concern within the Valley’s disadvantaged communities, something that needs to be taken into consideration.”<sup>18</sup>

During the June 22, 2023 Governing Board Meeting, a senior CARB staff person (her name was not shown on camera) responded to questions from Senator Stern’s by saying, “The first think I’d like to say is that we just absolutely need to get away from combustion and fossil fuels everywhere, including fossil gas.”

CARB’s 2022 Scoping Plan also mentions numerous times that the combustion of fossil fuel needs to go away.

It has been EIGHT years since the first comments. The 2023 COGR updates were in response to updated EPA Control Techniques Guidelines (CTGs). The current rulemaking is in response to updated EPA Emission Guidelines for the Oil and Gas sector. CARB knows there are unregulated areas in the oil and gas sector. CARB knows areas are struggling to meet attainment goals. CARB knows Greenhouse Gases need to be reduced. PLEASE, take this opportunity to make good on past statements, comprehensively update COGR, and stop allowing control techniques to contribute to the air quality problem.

Again, we would like to highlight that this is another area that can be specific to nonattainment areas. If CARB is not prepared to eliminate destructive controls altogether, we encourage CARB to stop new destructive control systems from being installed in nonattainment areas. Another option is to establish BACT-level exhaust emission limits on existing equipment that combusts oil and gas vapors. If industry can be required to reduce emissions from combustion equipment during rule updates, the oil and gas industry can reduce emissions from vapor combustion.<sup>19</sup>

### *The Cost To Industry*

The 2023 COGR presentation said the five-year estimated cost of the proposed amendments was \$6.6 million dollars, which the presentation says is 0.02% of industry sales in sectors covered by the regulation over the same period.<sup>20</sup> Yet, industry still made comments about the difficulty and cost of incorporating those amendments.

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[https://ww2.arb.ca.gov/sites/default/files/barcu/board/mt/2016/mt072116.pdf?\\_ga=2.84890448.89747599.8.1725389429-1753945576.1709232968](https://ww2.arb.ca.gov/sites/default/files/barcu/board/mt/2016/mt072116.pdf?_ga=2.84890448.89747599.8.1725389429-1753945576.1709232968), p. 66.

<sup>17</sup>

[https://ww2.arb.ca.gov/sites/default/files/barcu/board/mt/2016/mt072116.pdf?\\_ga=2.84890448.89747599.8.1725389429-1753945576.1709232968](https://ww2.arb.ca.gov/sites/default/files/barcu/board/mt/2016/mt072116.pdf?_ga=2.84890448.89747599.8.1725389429-1753945576.1709232968), p. 68.

<sup>18</sup> Ibid.

<sup>19</sup> SJVAPCD Rules 4306, 4320, and 4702 as examples.

<sup>20</sup> <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2023/062223/23-6-2pres.pdf>, slide 15.

In the upcoming COGR updates, we strongly encourage CARB to incorporate rule amendments that significantly reduce existing emissions and result in increased compliance amounts. The oil and gas sector should not be allowed to continue to significantly impact the air quality of the areas they operate in just because they have been able to in the past. Controlling emissions SHOULD be a significant operating cost when operating in a nonattainment area. California area SIP attainment date extension requests should be more than enough reason to press hard for meaningful reductions.

We thank you for the opportunity to help guide the upcoming rulemaking, and we welcome any comments, questions, or requests for participation during the process.

Respectfully submitted,

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