



October 17, 2016

Mr. Larry Sorrels
Health and Environmental Impacts Division
U.S. Environmental Protection Agency
C-439-02, 109 T.W. Alexander Drive
Research Triangle Park, North Carolina, 27709

RE: Availability of Two Updated Chapters in the Environmental Protection Agency's Air Pollution Control Cost Manual, Docket ID No. EPA-HQ-OAR-2015-0341-0046

Dear Mr. Sorrels:

Western Energy Alliance appreciates the opportunity to provide input on EPA's updated control device cost analysis manual. Based on our analysis of the updated control device manual, we believe that the size and design of control devices used in the upstream segment of the oil and natural gas industry are largely absent from EPA's analysis. We encourage EPA to clarify in the manual which industries and industry segments should use the manual as appropriate guidance and cost analysis.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents; the majority of which are small businesses with an average of fifteen employees.

As EPA is undoubtedly aware, the smaller, more dispersed facilities common to oil and natural gas production use different control device designs and have different economic considerations from large gas plants, chemical plants, and refineries. It would be beneficial for EPA to clarify that the current control device manual is not suited to analyzing control device costs for small upstream facilities to avoid a situation where EPA's analysis is potentially misrepresented as being representative for small sites, which could in turn lead to flawed cost-benefit analysis in future regulations or project-specific requirements.

Should EPA desire to apply control device cost analysis to small facilities, we believe a separate analysis would be warranted. If EPA chooses to conduct such an analysis, we would welcome the opportunity to provide input.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Streams", is positioned above the typed name.

Ryan Streams
Manager of Regulatory Affairs