



April 22, 2015

*Submitted via email A-and-R-Docket@epa.gov*

U.S. Environment Protection Agency  
EPA Docket Center  
Mailcode 28221T  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

RE: Oil and Natural Gas Sector; Definitions of Low Pressure Gas Well and Storage Vessels  
Docket ID No. EPA-HQ-OAR-2010-0505-4754

Dear Administrator McCarthy:

Western Energy Alliance supports the proposed rule amending to the New Source Performance Standard (NSPS) subpart OOOO definition of parallel storage vessels, published at 80 Fed. Reg. 15,180 (Mar. 23, 2015) ("Proposed Rule"). EPA has correctly chosen to overturn a definition introduced in December as a final rule without the benefit of public comment or the requisite regulatory analyses. We also support the change to the definition of a low pressure well.

Western Energy Alliance (Alliance) represents over 450 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. The Alliance represents independents, the majority of which are small businesses with an average of fifteen employees.

By including storage vessels connected or installed "in parallel" in the definition and applicability provisions in 79 Fed. Reg. 79,018 (Dec. 31, 2014) ("Final Rule"), the Final Rule arguably imposed the 6 ton-per-year VOC applicability threshold on a tank battery basis, rather than on an individual storage tank basis. The application of Quad O rules in this manner would have expanded the application of the rule well-beyond Quad O's original scope without the opportunity for public comment or an appropriate regulatory impact or cost analysis. Accordingly, Western Energy Alliance supports EPA's decision to remove this definition from the final rule.

In addition, the Alliance urges EPA to clarify that the unlawful December parallel tanks provisions will not be enforced during the interim period before the Proposed Rule's amended storage vessel language is finalized. It would be unreasonable to expect operator compliance during the short period before the amendments are finalized. In order to provide operational certainty, EPA should issue guidance to this effect.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Sgamma", is written over a light gray, semi-transparent signature line.

Kathleen M. Sgamma  
Vice President of Government & Public Affairs