
From: Dennis_Champion@oxy.com [mailto:Dennis_Champion@oxy.com]
Sent: Monday, March 01, 2010 5:23 PM
To: Dolores Gough
Cc: Arnaud Marjollet; dan.barber@valleyair.org
Subject: FW: Extension of Commenting Period for Oil and Gas Extraction, Storage, Transportation and Refining Operations

[See my comments below.](#)

Also, to the extent possible, the baseline should be moved back to the 1990 timeframe to match the timeframe of the AB32 baseline. Looking to another baseline could be counter-productive.

From: oil_and_gas_extraction_storage_transportation_and_refining_operations_bps@lists.valleyair.org [mailto:oil_and_gas_extraction_storage_transportation_and_refining_operations_bps@lists.valleyair.org]
Sent: Thursday, February 25, 2010 1:20 PM
To: Champion, Dennis
Cc: Arnaud Marjollet; Dan Barber
Subject: [Oil_and_Gas_Extraction_Storage_Transportation_and_Refining_Operations_BPS] Extension of Commenting Period for Oil and Gas Extraction, Storage, Transportation and Refining Operations

The District is extending the initial commenting period regarding development of Best Performance Standards (BPS) for Oil and Gas Extraction, Storage, Transportation and Refining Operations. The information requested below will be used when establishing Best Performance Standards for this Class and Category:

- Types of equipment with fugitive emissions that were in operation during the baseline period (2002-2004)
[Tanks, engines, wells, loading racks, depurators, gasoline storage and dispensing, gas plants, vessels at various facilities, pipelines](#)
- Aspects of operating the subject emissions source that are unique to your equipment
[Light oil with associated gas requires substantially more oversight.](#)
- Proposals for basis to quantify GHG emissions (lb/bbl oil, lb/process throughput, lb/equipment, etc)
[The predominant emissions point from operations is fugitive emissions. The emissions are based on components. Therefore, emissions should be based on a component type similar to the CAPCOA/EPA guidance. Utilizing a basis such as lbm/bbl is misleading as the emissions are not affected by throughput. They are only affected by the gas quality.](#)

- Vapor analysis quantifying CO₂, methane and non-methane components
The gas quality associated with a surface site is typically similar to other surface sites in the immediate area. However, the extent of difference between sites is generally marginal. Vapor analysis can be provided.
- Technologies or operational activities currently in practice to which should be considered.
A Fugitive Inspection and Maintenance program is best method to ensure leaks from fugitive components are identified and repaired. Also, training to stress sight, sound, and smell to the operators as well as the entire work force. The more eyes, ears, and noses the better. Finally, a good maintenance program is necessary to ensure program integrity.
- Any other suggestions, comments, and or data
As stated above, the best management practice is training to increase the amount of knowledgeable eyes, ears, and noses in the field.

Written comments regarding the subject Best Performance Standard should be addressed to Dolores Gough by email, Dolores.Gough@valleyair.org, or by mail at SJVUAPCD, 34946 Flyover Court, Bakersfield, CA 93308 and must be received by **March 4, 2010**. For additional information, please contact Dolores Gough by e-mail or by phone at (661) 392-5609.