



Interstate Natural Gas Association of America

April 22, 2015

Via email to a-and-r-docket@epa.gov

U.S. Environmental Protection Agency
EPA West (Air Docket), Room 3334
1301 Constitution Ave., NW
Washington, DC 20004
Attention: Docket ID Number EPA-HQ-OAR-2010-0505

Re.: Oil and Natural Gas Sector: Definitions of Low Pressure Gas Well and Storage Vessel Standards of Performance for New Stationary Sources: Oil and Natural Gas Production and Natural Gas Transmission and Distribution [40 CFR Part 60 Subpart OOOO](Docket ID No. EPA-HQ-OAR-2010-0505)

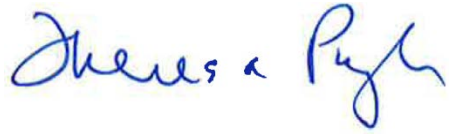
Dear Sir or Madam:

The Interstate Natural Gas Association of America (INGAA), a trade association of the interstate natural gas pipeline industry, respectfully submits these comments regarding the proposed amendments to the new source performance standards (NSPS) for the Oil and Natural Gas Sector. INGAA represents a majority of the interstate natural gas transmission pipeline companies operating in the United States as well as comparable companies in Canada. INGAA's members operate a network of approximately 200,000 miles of pipelines.

As with other trade groups, INGAA was concerned after reviewing the recently published rule, "Oil and Natural Gas Sector: Reconsideration of Additional Provisions of New Source Performance standards." 79 Fed Reg 79018 (December 31, 2014). The biggest concern for INGAA member companies was the discrepancy between the definition of *storage vessel* that was included in the proposed version of the rule versus the final version. As such, INGAA supported other trade associations' request for reconsideration of the above mentioned rule. The EPA granted the request for reconsideration and published: Oil and Natural Gas Sector: Definitions of Low Pressure Gas Well and Storage Vessel in the Federal Register on March 23, 2015. In these proposed amendments, EPA changed the definition of storage tank back to what was originally proposed, striking the language regarding tanks in parallel. INGAA supports this proposed change and appreciates EPA reconsidering the issue.

INGAA appreciates your consideration of these comments. Please contact me at 202-216-5955 or tpugh@ingaa.org if you have any questions. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Theresa Pugh". The signature is written in a cursive, flowing style.

Theresa Pugh
Vice President, Environment and Construction