

Submitted via www.regulations.gov

May 14, 2018

Mr. Justin Pryor Office of Atmospheric Programs Climate Change Division (6207A) U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

Re: Information Collection Request Submitted to OMB for Review and Approval; Comment Request; EPA's Voluntary Natural Gas STAR Methane Challenge, 83 Fed. Reg. 15,835 (Apr. 12, 2018); Docket ID No. EPA-HQ-OAR-2016-0731

Dear Mr. Pryor,

The Interstate Natural Gas Association of America ("INGAA") respectfully submits these comments in response to the U.S. Environmental Protection Agency's ("EPA's") request for comments on the Information Collection Request ("ICR") submitted to the Office of Management and Budget ("OMB") regarding EPA's Voluntary Natural Gas STAR Methane Challenge Program. EPA published this notice in the Federal Register on April 12, 2018 (83 Fed. Reg. 15,835).

INGAA is comprised of 27 members, representing the vast majority of the U.S. interstate natural gas transmission pipeline companies. INGAA's members operate nearly 200,000 miles of pipelines. Several members of INGAA participate in EPA's Natural Gas Star Methane Challenge Program. INGAA encourages OMB to approve EPA's ICR request so that companies who participate in the program will continue to have the opportunity to transparently report their progress towards their methane emission reduction goals. To that end, INGAA urges OMB to approve EPA's ICR request so that this important voluntary program can continue to operate.

INGAA appreciates your consideration of these comments and we welcome additional dialogue. Please contact me at 202-216-5955 or ssnyder@ingaa.org if you have any questions. Thank you.

Sincerely,

Sandra Y. Snyder

Landia of Drugeles

Senior Regulatory Attorney, EH&S

Interstate Natural Gas Association of America