

Alaska Oil and Gas Association



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Marilyn Crockett, Executive Director

June 11, 2010

Environmental Protection Agency
EPA Docket Center (EPA/DC)
Attention Docket EPA-HQ-OAR-2009-0923
Mail Code 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: 40 CFR Part 98, Mandatory Reporting of Greenhouse Gases: Petroleum and Natural Gas Systems; Proposed Rule

Dear Sir:

The Alaska Oil and Gas Association (AOGA) is a private, nonprofit trade association whose members account for the majority of oil and gas exploration, development, production, transportation, refining and marketing activities in Alaska. AOGA's members include companies who operate offshore in State waters in Cook Inlet.

AOGA endorses the comments on the proposed rule being submitted by the American Petroleum Institute (API) and encourages EPA to consider and incorporate the suggestions contained therein.

We offer the following additional comment on reporting requirements for offshore production.

Subsection 98.232(b) contains the following requirement: "For offshore petroleum and natural gas production, report emissions from all "stationary fugitive" and "stationary vented" sources as identified in the Minerals Management Service (MMS) Gulfwide Offshore Activity Data System (GOADS) study (2005 Gulfwide Emission Inventory Study MMS 2007- 067)."

Companies operating offshore platforms in State waters in Alaska's Cook Inlet have no experience or systems in place to monitor and report emissions under the GOADS system and the proposed rule does not clearly identify sources subject to reporting. Therefore, we recommend that EPA allow the use of best available monitoring methods for the first year of data collection for operations occurring offshore in Cook Inlet.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Marilyn Crockett". The signature is written in a cursive, flowing style.

MARILYN CROCKETT
Executive Director