



Maria Pica Karp

Vice President and General Manager, Government Affairs

April 23, 2018

Via online submission: www.regulations.gov

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20460

Re: Docket ID Number: EPA-HQ-OAR-2015-0216-0327

Chevron U.S.A. Inc. ("Chevron") is an integrated energy enterprise involved in all aspects of the energy business: exploration, production, manufacturing, transportation, marketing, and research. We are committed to conducting our operations safely and in a manner that protects the environment. Chevron is an active operator in the U.S., with exploration and production operations in California, Colorado, Gulf of Mexico, Louisiana, New Mexico, Ohio, Pennsylvania, Texas, and West Virginia. Chevron has operations in California that are in an ozone non-attainment area, as well as operations in Pennsylvania that are part of the ozone transit region impacted by the control technique guidelines.

We appreciate the opportunity to provide comments on the notice of proposed withdrawal of the control techniques guidelines (CTG) published March 9, 2018. We believe it is crucial that the EPA and other interested agencies work closely and collaboratively with industry stakeholders who bring real world expertise and experience to these very complex issues.

As a member of the American Petroleum Institute (API), we support and adopt the comments submitted by API. In addition to those comments, we would like to highlight a few items for your consideration as noted below.

We support the agency's proposed withdrawal of the CTG and agree with its conclusion that it is prudent to withdraw the CTGs because of its significant reliance on the 2016 New Source Performance Standard (Subpart OOOOa) which is currently being reconsidered. In addition, we believe the CTG represent an additive burden to operators in non-attainment areas or the ozone transit region that are already subject to existing requirements limiting VOC emissions.

The 2016 CTGs recommended nearly identical controls to those identified in the Subpart OOOOa new source rule. The cost analysis applied did not adequately recognize that the costs of retrofitting and controlling existing sources is greater than designing and constructing sites to new standards. We believe installing controls on existing sources are costlier and less effective than installing controls on

new sources and, in most cases, due to the production decline curve on oil and gas wells, could result in fewer emissions reductions than noted in the 2016 CTGs.

Furthermore, state and local jurisdictions currently deploy programs to regulate emissions from existing oil and gas operations in non-attainment areas and the ozone transit region covered by the CTGs. For example, California, Colorado and Wyoming have programs in place for limiting emissions from existing sources in areas of ozone non-attainment. Pennsylvania's Exemption 38 permit mechanism includes VOC controls. However, the CTG did not fully recognize the work states have already done to develop VOC requirements that are tailored to address their specific ozone designation. Withdrawing the CTGs relieves affected states of the obligation to review oil and gas sources for the specific nonattainment/ozone transit region under 182(b) using the current CTGs, which are based on Subpart OOOOa, which is being revised.

We greatly appreciate your attention and support this proposal. We are prepared to meet at your convenience to further discuss these comments. If you have any questions, please contact Vanessa Ryan at (925) 842-0867 or vanessa.ryan@chevron.com

Sincerely,

A handwritten signature in black ink, appearing to read "Francis Ryan", with a long horizontal flourish extending to the right.