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Williams Ohio Valley Midstream, LLC
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April 10, 2025

VIA EMAIL: laura.m.jennings@wv.gov

Laura Jennings
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

RE: Open Comments for Draft 45CSR45 Rule (*Standards of Performance for Existing Crude Oil and Natural Gas Facilities*)

Dear Ms. Jennings,

Williams Ohio Valley Midstream (“Williams OVM”) has reviewed the draft version of the West Virginia state rule (45 CSR 45), which is under development to implement and adopt the the federal emissions guidelines as published by the U.S. EPA March 8, 2024, in accordance with the federal implementation requirements found at 40 CFR 60, Subpart Ba. Williams OVM is pleased to submit the following comments on this draft version of this State rule.

Comment #1

In Section 18.6.1 of the draft rule, it states that “*A valve that begins operation in gas/vapor service or in light liquid service after the initial startup date for the process unit shall be monitored for the first time within 90 days after the end of its startup period...*” There is no clear definition in the rule of startup period as related to onshore natural gas processing plants and monitoring of its process unit equipment components. Please consider adding clarification on the definition of startup period, including when the State would consider the startup period for a process unit complete.

Comment #2

Section 18.8.4 cites “...*paragraph (h)(3) of this section, ...*” It is presumed that this is in reference to 40 CFR §60.5401c(h)(3). Please consider referencing the Federal rule section or consider referencing Section 18.8.3 of the draft State rule.

Comment #3

Section 18.9.2.b.4 of the draft rule states the requirements where an owner/operator is not required to utilize a low-e valve or low-e packing to repack a valve if it can be demonstrated that a low-e valve or low-e packing is not technically feasible. Would technically infeasible also include performing a drill and tap (Section 18.9.2.b.3) on a valve where the leak source is not

the packing? For example, a valve leak could leak from a grease port, a drill and tap with low-e packing would not ultimately repair the leak since the leak source was not on the packing of the valve. Consider adding an exception of performing a drill and tap on a valve where the leak source is not the packing of the valve either as a technical infeasible consideration in Section 18.9.2.b.4 or as an exception in Section 19 of the draft rule.

Comment #4

Regarding Section 17.8.2.b.4 of the draft rule, please consider adding the same exception as stated in Comment #3 above for the same reasoning and example stated.

Williams OVM appreciates the opportunity to review the proposed draft version of the West Virginia State rule and provide input on the new rule implementing Subpart OOOOc of the Standards of Performance for Existing Crude Oil and Natural Gas Facilities. Thank you for your time and consideration of the comments we have submitted.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven J. Sobutka", with a long horizontal stroke extending to the right.

Steven J. Sobutka
Environmental Specialist
Williams Ohio Valley Midstream, LLC