



**Associated Petroleum
Industries of Pennsylvania**
A Division of API

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April 9, 2012

Ms. Arleen Shulman, Chief
Division of Air Resource Management
Bureau of Air Quality
Department of Environmental Protection
P.O. Box 8468
Harrisburg, PA 17105-8468

Re: Control Measures under Consideration by the Ozone Transport Commission; Public
Comment Period

Dear Ms. Shulman:

Associated Petroleum Industries of PA (APIP) submits the following comments in response to the Pennsylvania Department of Environmental Protection (DEP) Public Notices in the Pennsylvania Bulletin dated March 17, 2012 requesting comment on Control Measures under Consideration by the Ozone Transport Commission; Public Comment Period. In summary, APIP believes that the proposed Model Rule for Nonroad Diesel Equipment Anti-Idling should be made consistent with the Guidance for Implementation of Nonroad Idling Rule with regard to maintaining nonroad engines in a ready-reserve state at oil and gas exploration and production facilities. Otherwise, the model rule would unnecessarily interfere with well drilling and completion operations.

The Associated Petroleum Industries of Pennsylvania (APIP), a division of the American Petroleum Institute (API), is pleased to provide comments on the Control Measures under Consideration by the Ozone Transport Commission. APIP/API is a national trade organization that represents over 480 companies involved in all aspects of the oil and natural gas industry including exploration and production, transportation, marketing and refining. As such, APIP/API represents the leaders of a technology-driven industry that supplies most of America's energy, supports 9.2 million U.S. jobs and 7.7 percent of the U.S. economy, and delivers more than \$86 million a day in revenues to our government. Many of our members have a direct interest in the proposed general permit.

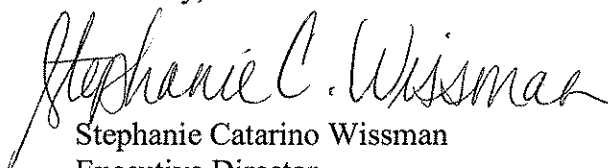
The Marcellus Shale formation in the Appalachian Basin contains vast reserves of natural gas. To produce gas from its reserves, APIP member companies necessarily will have to conduct well drilling and completion activities that will be subject to the proposed Model Rule for Nonroad

Diesel Equipment Anti-Idling. The proposed rule will limit idling of nonroad diesel engines to no more than three to five minutes. This would unduly interfere with operations including making changes to the drill pipe or installing casing or cement when drilling a well, and moving between formations or stages during hydraulic fracturing and other activities involved in well completion.

The proposed Guidance for Implementation of Nonroad Idling Rule recognizes these types of activities at oil and gas exploration and production facilities by indicating that maintaining nonroad engines in a ready-reserve state is not idling. That concept needs to be clearly included in the model rule. Although the guidance is clear, it is only guidance and does not carry the weight of the rule. Unless the concept is clearly incorporated into the rule, implementation will likely be inconsistent. Therefore, it is recommended that Model Rule Section Env-A XXXX.03 Non-Applicability be amended to include maintaining nonroad engines in a ready-reserve state for oil and gas exploration and production facilities.

APIP appreciates the opportunity to offer these comments for DEP's consideration and requests that they be conveyed to the Ozone Transport Commission prior to consideration of the model rule. Please contact me if you have any questions or if I can provide any further information.

Sincerely,

A handwritten signature in cursive script that reads "Stephanie C. Wissman". The signature is written in black ink and is positioned above the printed name and title.

Stephanie Catarino Wissman
Executive Director