



September 26, 2011

Mr. Joseph Jakuta
Ozone Transport Commission
Hall of States
444 North Capitol St., Suite 638
Washington, DC 20001

Re: Comments on Proposed 2014 Rule for Control of NO_x Emissions From Natural Gas Pipeline Compressor Fuel-Fired Prime Movers

Dear Mr. Jakuta:

These comments are being filed on behalf of the Marcellus Shale Coalition (MSC), a regional trade association with international membership. The MSC was formed in 2008 and is currently comprised of nearly 250 producing, mid-stream and associate members who are fully committed to working with local, county, state and federal government officials and regulators to facilitate the development of the natural gas resources in the Marcellus geological formation. Our members represent many of the largest and most active companies in natural gas production, transmission, and gathering in the country, as well as the suppliers and contractors who service the industry.

The MSC respectfully submits to the Ozone Transport Commission these comments regarding the Proposed 2014 Rule for Control of NO_x Emissions from Natural Gas Pipeline Compressor Fuel-Fired Prime Movers.

Comments

In January 2011, the United States Environmental Protection Agency (EPA) published a notice proposing a revised primary ozone NAAQS ranging from 0.060 to 0.070 parts per million (ppm) to protect public health and a new cumulative, seasonal secondary standard ranging from 7-15 ppm-hours to protect sensitive vegetation and ecosystems. EPA was expected to revise the primary and secondary ozone NAAQS in September 2011. However, on September 2, 2011, the President directed EPA to wait until 2013 for the regularly scheduled review of the ozone limit before finalizing it.

On September 9, 2011, Pennsylvania Department of Environmental Protection Secretary Krancer issued a press release indicating that, as a member of the Commission, he agreed that issuing the interim ozone standard now would have been problematic. He indicated that the standard would have created needless regulatory uncertainty in the business world and was not supported by the best science.

The Commission has issued a charge to the mobile, stationary and area source and modeling committees to identify the measures and develop model rules, if necessary, for consideration by the Commission in November 2011. The Commission may consider final action during its annual meeting on November 10, 2011, which would commit signatory states to pursue the adoption and implementation of control strategies

In light of the actions by the President and the Secretary, we believe that the Ozone Transport Commission should not take any action to adopt and implement this proposed rule before required to do so to meet NAAQA established by the EPA. The MSC does, however, believe that the OTC should support the increased use of clean burning natural gas, especially in vehicles in the nonattainment areas where ambient standards have yet to be met.

We respectfully ask the Ozone Transport Commission to consider our comments. Please contact me if you have any questions or if I can provide any additional information.

Very truly yours,



Kathryn Z. Klaber
President and Executive Director