



**SWEPI LP**

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September 26, 2011

**VIA U.S. Mail and E-Mail**

Alex Ryan-Bond  
Ozone Transport Commission  
Hall of the States  
444 North Capitol Street  
Suite 638  
Washington, D.C. 20001

**Re: Draft Model Rule for the Control of NOx Emissions from Natural Gas Pipeline Compressor Prime Movers**

Dear Mr. Ryan-Bond:

SWEPI, LP (Shell) submits the following comment to the above-referenced draft model rule being developed by the Ozone Transport Commission (Commission).

Shell owns and operates oil and gas producing assets within the Ozone Transport Region and has a direct interest in how the draft model rule is formulated by the Commission and implemented by the member states in the region.

Overall, the model rule creates ambiguity because it does not clearly indicate the scope of its applicability.

- Section 1.0 of the model rule states that the purpose of the rule is to provide NOx emissions limitations for: “existing natural gas fueled prime movers powering compressors used for pipeline transportation of natural gas . . .”
- Section 3.0 of the model rule states that it is “applicable to existing natural gas fueled prime movers powering compressors used for pipeline transportation of natural gas . . .”

It is our understanding that the model rule is intended to apply to compressor engines servicing natural gas transportation pipelines. However, these provisions do not clearly indicate that the rule does not cover compressor engines servicing field gathering of natural gas.

We offer the following suggestions to add clarity to the model rule:

1. Add an exception at Section 3.2 or 3.4 for “natural gas fueled prime movers powering compressors used in field gathering.”
2. Add a definition of “pipeline” to clearly state that this covers transportation pipelines but not gathering lines used in field gathering.

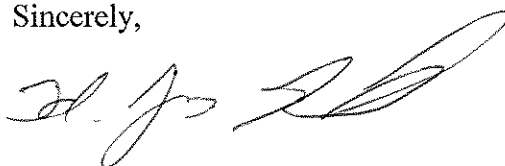
We also note that the draft rule includes a definition of “field gathering” but does not use that phrase in the rule itself. As proposed above, we suggest that the term may be used to clarify that the rule does not apply to natural gas fueled prime movers used in field gathering.

Additionally, the Commission should make any corresponding changes in its White Paper: *NOx Controls for Natural Gas Pipeline Compressor Prime Movers*. It is equally unclear in that document that the model rule is intended to encompass transportation pipelines, but not gathering lines.

Finally, the Commission should consider whether this model rule should be postponed to avoid needless regulatory uncertainty in light of President Obama’s direction to EPA to wait until 2013 to review the primary ozone NAAQS.

We respectfully ask the Commission to consider our comments. Please contact me at (724) 778-9153 if you have any questions or if I can provide any further information.

Sincerely,



H. James Sewell

Environmental and Regulatory Team Lead