

**THE SENATE
STATE OF NEW YORK**



SHELLEY B. MAYER
SENATOR, 37TH DISTRICT
DEPUTY MAJORITY LEADER FOR
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SUBMITTED VIA EMAIL

July 26, 2021

Ona Papageorgiou, P.E.
New York State Department of Environmental Conservation
625 Broadway, 11th Floor
Albany, NY 12233-3250
air.regs@dec.ny.gov

RE: Proposed 6 NYCRR Part 203 “Oil and Natural Gas Sector” Rulemaking

Dear Ms. Papageorgiou,

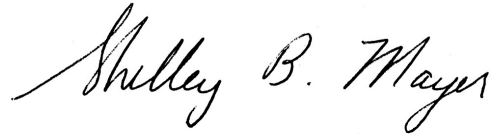
I am writing to submit comments in response to the Notice of Proposed Rule Making regarding proposed new 6 NYCRR Part 203 and supporting documents which affect the oil and natural gas sector.

I applaud the Department of Environmental Conservation (the “Department”) for taking this important step to reduce emissions of methane and other pollutants consistent with United States Environmental Protection Agency Control Technique Guidelines. However, while the proposed regulations would result in meaningful reductions emissions, in light of the requirements of the Climate Leadership and Community Protection Act (the “CLCPA”), I request that the Department examine whether these proposed regulations can be improved.

Specifically, I urge the Department to review similar regulations implemented or proposed by other states to ensure that New York will be a leader when it comes to emissions reductions from the oil and gas sector. Environmental advocates have requested enhanced requirements for leak detection and repair, additional measures to be taken for “blowdowns,” and have suggested more reporting, inspection, and auditing to improve compliance, among other measures. I wish to express support for further review of these matters by the Department so that New Yorkers can have certainty that the state is committed to taking aggressive actions in this matter.

Successfully implementing the groundbreaking CLCPA is of critical importance, and the state should adhere to the highest standards of protection in seeking to achieve our climate goals.

Sincerely,

A handwritten signature in black ink that reads "Shelley B. Mayer". The signature is written in a cursive style with a large, sweeping initial 'S'.

Shelley B. Mayer
New York State Senator
37th Senate District