

Section	Current	Proposed	Rationale
95464(e)(2) – Gas collection system component downtime limit before EO notification	5 days	30 days	Allow for routine maintenance and other operations-related downtime. Avoid inundating EO with reporting.
95469(a)(1)(B) – Instantaneous Surface Monitoring Corrective Actions & 95469(a)(2)(B) – Integrated Surface Monitoring Corrective Actions	Corrective action in 3 calendar days, re-monitor by 10 days.	Corrective action and re-monitor within 10 days.	Align with federal rules, reduce administrative burden and focus on correcting exceedances by allowing operator to identify, correct and re-monitor within a single timeframe.
95469(a)(1)(C) & (a)(2)(cC)– Final cover monitoring	If year with no exceedances, final cover may be monitored every 3 quarters.	Annual monitoring.	Align with federal rules. Requiring monitoring every three quarters impractical from an operator budgeting and planning standpoint and would impose separate state and federal timelines.
95469(a)(1)(D) & (a)(2)(D) – Exceedances detected during compliance inspections.	Automatic return to quarterly inspections.	Allow 10 day repairs and remonitoring.	Operator should have opportunity to correct prior to imposing quarterly testing.
95469(a)(1)(B)(2-3) & (a)(2)(B)(2-3) – Re-monitoring and	Re-monitor grid one month after exceedance, report replacement well to	Clarify that exceedances are not violations so	Federal rules specify that, so long as specified actions are taken, exceedances are not violations.

replacement well reporting	EO, replace within 120 days	long as specified actions are taken.	
95469(a)(4) – Recurring Surface Exceedances	Perform cover integrity assessment, monthly monitoring for impacted grid and all adjacent grids.	Limit to only affected grid and return to normal monitoring cadence after 3 months.	Would require excessive monitoring of areas not known to have issues. Efficacy of corrective action should be known after three consecutive months of monitoring.
95469(b)(2)(A) – Time limit to perform SEM after remote monitoring plume notification	Take actions within 5 calendar days	Take actions within 10 calendar days	Align with other monitoring methods.
95469(b)(2)(A)(1) – Plume detection monitoring area	Monitor 600ftx600ft square centered on plume origin	Monitor 50ftx50ft square centered on plume origin	Proposed 600ftx600ft monitoring area is 8.26 acres (roughly eight football fields).
95469(b)(2)(A)(3) – Component leak monitoring	Component leak monitoring whether components expected to be under positive or negative pressure	Negative pressure only	
95469(c)(1)- Tagging	Affix weatherproof tag with ID	Allow photographs or other similar electronic recordkeeping	Monitoring equipment already tracks date/time and concentration.
95469(c)(2)- Component leak repair	Must be repaired and remonitored within 10 days	Add exception process	Need exceptions for when special orders or parts/service are needed
95469(d)(2)(A) – Change in gas flow	Document cause of any 3-hr period of operation w/ >20% gas flow	Recommend removal	Excessive data review requirement

95469(e)(1) – Positive pressure	Must correct within 120 days	Include provision where corrective action will take longer than 120 days.	Align with AAAA which provides a process to submit a root cause analysis, corrective action analysis and implementation timeline to Administrator/EO.
95469(g)(1) – Wellhead tuning	Re-tune all wells within a day each time GCS pressure setpoint is changed	Re-tune all wells within 10 days	Not feasible to re-tune entire wellfield in one day.
95470(a)(1)(D) – SEM monitoring data & (a)(1)(F) – Component leak monitoring data & (b)(6)(D)	Record time/date of measurements (i.e. each one hertz reading)	Strike reference of one hertz	Monitoring systems measure in five second intervals. Reducing intervals to one second could overwhelm system.
95470(a)(1)(EE) – Calibration records	Record calibration of any instrument that requires calibration under section.	Include list of required instruments.	Recommend including list of required instruments for clarity purposes.
95470(b)(7)(A-B)	Specified actions within 8 days of notification and 5 days of re-monitoring.	Consolidate all reporting in a 30 day report.	Timelines are too tight and will distract from corrective actions. Allow for summary of actions taken within 30 calendar days.
95470(b)(9) – Certification by responsible official	Required for any report or information submitted in LMR.	Require for reports only	LMR contains significant notification requirements. Certifications should only be required for reporting.