



March 25, 2015

Council on Environmental Quality
Attention: Michael Boots
722 Jackson Place, N.W.
Washington, D.C. 20503

Re: Guidance on Considering Climate Change in NEPA Reviews and Conducting Programmatic NEPA Reviews

Mr. Boots:

The Gas Processors Association (GPA) respectfully submits comments to the proposed draft "Guidance on Considering Climate Change in NEPA Reviews and Conducting Programmatic NEPA Reviews" which was posted for public comments on December 24, 2014 in 79 Fed. Reg. 77,802.

GPA has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA is composed of 130 corporate members that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as "midstream activities." Such processing includes the removal of impurities from the raw gas stream produced at the wellhead, as well as the extraction for sale of natural gas liquid products (NGLs) such as ethane, propane, butane and natural gasoline. GPA members account for more than 90 percent of the NGLs produced in the United States from natural gas processing

The proposed draft guidance document proposes 25,000 tons carbon dioxide equivalents as the threshold below which quantitative analysis are not recommended in NEPA related reviews. GPA respectfully requests that the Council on Environment revises this threshold to at least 100,000 tons of carbon dioxide equivalents.

We appreciate the agencies consideration of our request. If you have questions please contact me at (918) 493-3872 or by email at mwhite@global.org or Douglas Jordan, GPA Environmental Committee Chair, at (281) 610-4291 or by email at douglas_jordan@swm.com.

Sincerely,

Matthew Hite
Vice-President Government Affairs
Gas Processors Association

Cc: Electronic submittal submitted to:

<http://www.whitehouse.gov/webform/submit-comments-revised-draft-guidance-greenhouse-gas-emissions-and-climate-change-impacts>