



November 25, 2019

Ms. Amy Hambrick  
Environmental Protection Agency  
EPA Docket Center  
Docket ID No. EPA-HQ-OAR-2017-0757  
Mail Code 28221T  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Submitted electronically at: [www.regulations.gov](http://www.regulations.gov)

**Re: Jonah Energy LLC Comments to the Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Review, 84 Fed. Reg. 50244 (September 24, 2019) Docket ID No. EPA-HQ-OAR-2017-0757**

Dear Ms. Hambrick:

Jonah Energy LLC (Jonah Energy) respectfully submits the following comments pursuant to the Environmental Protection Agency's Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Review proposed rule.

Jonah Energy is a small independent oil and gas exploration and production company headquartered in Denver, Colorado. Our asset base is in Southwest Wyoming in the Jonah Field and surrounding area. We currently operate over 2,400 producing wells in the area and average approximately 550 mmcfe/day of gross production.

We work to reduce emissions and increase energy efficiency in both our planning and operations. In the Jonah Field, this includes nationally recognized programs to reduce air emissions, utilizing natural gas as a fuel source and virtually eliminating the practice of flaring. Natural gas fueled drill rigs, green completions and our leak detection and repair program are a few of the measures in place within the Jonah Field that have substantially reduced our operating emissions.

We currently exceed regulatory requirements with our monthly frequency of leak detection monitoring. We have implemented utilization of drones to supplement our handheld FLIR camera LDAR program and have begun pilot testing the use of fixed emissions monitors to determine if they can help us to further reduce our leak cycle time.



Jonah Energy strongly believes in the role of natural gas to meet current and future global energy demand and to provide reliable domestic energy and further believes this can be accomplished in an environmentally sensitive manner. Increased reliance on natural gas has already resulted in reductions of greenhouse gas emissions.

Jonah Energy supports reasonable federal regulations of methane emissions that provide consistency and certainty covering all sectors of natural gas development to promote public confidence in natural gas as a preferred energy source and provide operators with stability in their planning and capital spending. Regulations should incentivize operators who strive to improve using new technology, recognize and support different operations across the country and have a consistent enforcement mechanism.

Jonah Energy does not support EPA's Policy Rule proposal to recind the methane-specific performance standards for the oil and gas sector. The regulations are common sense, cost effective and help continue to reduce fugative methane emissions across the nation.

We appreciate the opportunity to comment. Please contact me if you require any additional information or have questions.

Sincerely,

A handwritten signature in blue ink that reads "Paul Ulrich".

for Paul Ulrich  
Vice President-Government and Regulatory Affairs  
Jonah Energy LLC

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