

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
OKLAHOMA CLIMATE POLLUTION REDUCTION GRANT

CPRGOK INFORMATIONAL PUBLIC MEETING – AUGUST 30, 2023

Written Comments

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From: [Cooper, Antonne](#)
To: [DEQ CPRGOK](#)
Subject: [EXTERNAL] DEQ CPRGOK
Date: Wednesday, August 30, 2023 2:04:20 PM
Attachments: [image001.png](#)

Good afternoon. OGE has an extensive low-income based weatherization program. We would love to partner with DEQ and provide any assistance we can for both residential and commercial customers.

Toney Cooper

Lead Program Manager, Residential



321 N. Harvey Ave M/C 201
Oklahoma City, Oklahoma 73102

Office: 405.553.3256
Mobile: 405.650.6726
cooperan@oge.com

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From: [Natalie Cota](#)
To: [James Ward](#)
Subject: FW: [EXTERNAL] Potential EcoRise Collaboration for CPRGOK
Date: Friday, September 29, 2023 1:56:35 PM

From: Abby Randall <abby@ecorise.org>
Sent: Wednesday, August 30, 2023 2:22 PM
To: DEQ CPRGOK <CPRGOK@deq.ok.gov>
Subject: [EXTERNAL] Potential EcoRise Collaboration for CPRGOK

Hello!

I attended the public meeting for the Climate Pollution Reduction Grant and would love to connect with someone to share a bit about EcoRise's implementation-ready programs for cultivating a diverse green workforce through [K-12 programming](#) and [youth programs](#) focused on green career development and civic action. We offer STEM-based, standards-aligned curriculum and professional development for K-12 teachers as well as youth climate councils and paid internships for green careers.

EcoRise serves communities all over the country and specifically here in Oklahoma (I am based in OKC) through an EPA Environmental Literacy Grant. If and when the time is right to discuss potential collaborations, please do let me know.

Warmly,
Abby



Abby Randall (she/her)

Deputy Director

www.ecorise.org | w: (512) 651-3563 ext. 705 | m: (512) 658-0055 | Let's chat! Book a time [here](#).



From: [Samuel Wijaya](#)
To: [DEQ CPRGOK](#)
Subject: [EXTERNAL] Implementing Oklahoma's PAP and CAP efficiently
Date: Wednesday, August 30, 2023 2:56:51 PM

Hello,

I was reading the Oklahoma Pollution Reduction Plan and thought that we could collaborate in the future implementation of PAP and CAP.

We are a spin-out company from the City of Helsinki focused on developing open source software tools for cities and states to monitor, track and communicate their climate actions efficiently and transparently. The original version was developed in the City of Helsinki back in 2019 and it is now in use in dozens of cities across three continents. Here is an overview [video](#) of our platform and our recent work with the [City of St. Paul](#).

Could we have a short 45 min call so that we can discuss further?

Thank you.

Samuel Wijaya, Sustainability Partner
[Kausal Ltd](#)
samuel.wijaya@kausal.tech | t. +358-41-4787677
Turn climate goals into actions

From: [Ryan Franklin](#)
To: [DEQ CPRGOK](#)
Cc: [Levi Richardson](#); [Nick Archer](#)
Subject: [EXTERNAL] Public Comments and Questions
Date: Wednesday, August 30, 2023 4:18:40 PM
Attachments: [ATT00002.png](#)
[ATT00003.png](#)
[ATT00004.png](#)
[ATT00005.png](#)
[ATT00006.png](#)

Name: Ryan Franklin
Company: GAS

GAS (Great Plains Analytical Services) is a well established emissions testing provider here in Oklahoma with extensive experience in these matters. We would be interested in partnering in a pilot program to demonstrate the efficacy of any solution to be considered, specifically in the areas of measurement, analysis, and technology solutions.

Questions:

1. Can you elaborate on the key objectives for the PAP and CAP?
2. What are the biggest challenges you foresee in implementing these plans?
3. Are you looking for multiple partners for different aspects, or is there an opportunity for a single partner to manage everything?
4. Are there any specific technologies or methodologies that DEQ is considering for this project?
5. How will the success of these plans be measured?
6. Have there been any similar initiatives in the past? What were the learnings from those?
7. What is the decision-making process for selecting a partner for this project, specifically will MBE, 8a or HUBZone certifications be considered?
8. What are the next steps after this meeting?
9. When can we expect to hear back regarding the selection process?
10. Are there any specific software or data management systems that DEQ is currently using or plans to use?

Regards,

Ryan Franklin | VP of Strategic Growth

C: (405) 316-0468 | **O:** (580) 225-0403



The content of this email is confidential and intended for the recipient specified in message only.
It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender.

From: [L & D Innovations LLC](#)
To: [DEQ CPRGOK](#)
Subject: [EXTERNAL] Letter of intent
Date: Friday, September 1, 2023 8:32:01 PM

I have the most amazing science based ideas to revolutionize the the entire planet. We as Oklahoman's have an extraordinary opportunity to set an example on a new standard of convenient living. I have designed processes to turn the over abundance of clean organic matter (not food scraps) into a profitable organically packaged product in 16 days. Please reach out to me. I have sent a letter of intent to the city of Edmond's city manager's assistant Andy Conyers today.
So, this is my contact information:

Lindsay McDonald
L & D Innovations LLC
405)365-7884
thislandwasmade4uandme@gmail.com

From: [randy_ward](#)
To: [DEQ CPRGOK](#)
Subject: [EXTERNAL] Comments for CPRGOK Public Meeting
Date: Tuesday, September 12, 2023 6:03:07 PM

Thank you for providing this opportunity to comment on this meeting and on the CPRGOK grant and planning. I was unable to attend in person but did watch on YouTube and thank you for providing that.

My first comment addresses the meeting itself; it was unfortunate that Mr. Ground exceeded his allotted comment time by a very large margin. Having been to many public meetings recently I can say it's a problem with commenters and there is no good way to handle it, but it can lead to perceptions of bias.

For the actual program I look forward to following the progress, and hope that it can lead to some good projects. Hopefully some of those projects can be "hard" science, that leads to collection of data that can be replicated and used to measure progress. For example, the recent Heat Mapping Study in OKC was not particularly groundbreaking but it did collect actual data on routes that could be repeated in the future. Monitoring, meteorological studies, and the creation of databases would all be tools for the future.

There does appear to be many opportunities to collaborate with other groups, hopefully a variety of small and large organizations with a variety of viewpoints. With the tribes included in this funding it's an excellent opportunity to increase the funding for Oklahoma.

Randall Ward, MPH
405-794-1475
randy1993@yahoo.com

From: [Angie Burckhalter](#)
To: [DEQ CPRGOK](#)
Cc: [Kendal Stegmann](#); [Bud Ground](#)
Subject: [EXTERNAL] Alliance comments on ODEQ's CPRG Plan
Date: Thursday, September 14, 2023 3:25:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[Alliance final comments OKCPRG workplan 20230914.pdf](#)

The attached file provides The Alliance's comments on ODEQ's CPRG Plan. We look forward to working with ODEQ on this effort.

Best Regards,



Angie Burckhalter

Sr. V.P. of Regulatory &
Environmental Affairs
500 NE 4th Street, Suite 200
Oklahoma City, OK 73104
P. 405.601.2124
C. 405.206.8163
E. angie@okpetro.com





September 14, 2023

Submitted via CPRGOK@deq.ok.gov

Kendal Stegmann, Director
Air Quality Division
Oklahoma Department of Environmental Quality
Attn: CPRG
P.O. Box 1677
Oklahoma City, OK 73101-1677

Re: Comments on Oklahoma's Climate Pollution Reduction Grant

Dear Ms. Stegmann:

The Petroleum Alliance of Oklahoma (The Alliance) appreciates the opportunity to provide comments on the Oklahoma Department of Environmental Quality's (ODEQ's) Climate Pollution Reduction Grant Plan (CPRG Plan).

The Alliance represents more than 1,400 individuals and member companies and their tens of thousands of employees in the upstream, midstream, and downstream sectors and ventures ranging from small, family-owned businesses to large, publicly traded corporations. Our members produce, transport, process and refine the bulk of Oklahoma's crude oil and natural gas. Our members are committed to extracting, producing, transporting, and refining crude oil and natural gas in a safe and environmentally-sound manner, and they have and will continue to deploy technologies that result in emission reductions (including greenhouse gases) through innovative solutions and breakthrough technologies while meeting the energy demands of today and the future.

We offer the following comments and recommendations.

Comments on the CPRG Plan

1. General

- i.** It is unclear how the Plan will support ODEQ's and the oil and gas industry's efforts to better manage EPA's forthcoming New Source Performance Standards (NSPS) OOOOb/c rules, the Greenhouse Gas Reporting Rule (GHGRR) - Subpart W revisions, and the Waste Emission Charge (WEC) to efficiently and cost effectively reduce emissions. These proposed rules will be burdensome and costly on all operators, especially smaller operators of existing facilities. We request ODEQ prioritize studies and projects that would help the state and oil and gas operators prepare for these forthcoming rules, and we welcome the opportunity to collaborate with ODEQ on such efforts.
- ii.** It is unclear if or how Oklahoma's Emission Reduction Technology Rebate Program could dovetail into the CPRG planning phase or the implementation phase. We request ODEQ



consider how both efforts could be coordinated to maximize the reduction of emissions efficiently and effectively in the oil and gas industry.

- iii. It is unclear if ODEQ plans to reach out to neighboring states to determine if there are any collaborative efforts that could be conducted or to ensure consistency in similarly related projects.
- iv. We recommend ODEQ collaborate with the Oklahoma Corporation Commission to obtain onsite, emission data from equipment and wellheads located on unplugged orphan wells (where no viable operator exists) to better characterize emissions from those types of wells instead of using EPA's data that may not be representative of Oklahoma's orphan wells. In addition, it is unclear how ODEQ's CPRG Plan will obtain empirical emissions data from existing oil and gas equipment that will more accurately reflect methane emissions. This Oklahoma specific information may support ODEQ's efforts in developing defensible, reasonable and appropriate requirements for its future NSPS OOOOo program, support revisions to EPA's outdated and inaccurate equipment emission factors or calculation methodologies that overestimate emissions from sources regulated under NSPS OOOOa/b and the Greenhouse Gas Inventory (GHGI) for the oil and gas sector. Again, we welcome the opportunity to collaborate with ODEQ on such efforts.

2. Specific Comments

- i. **Reference to Workplan Summary, page 2** – The CPRG Plan references Oklahoma's "pollution management plan." We are unaware of such a plan. Please clarify what this is and where it can be found.
- ii. **Reference to Deliverables Development Process, page 3** – ODEQ provides a milestone schedule for the Priority Action Plan (PAP), the Comprehensive Action Plan (CAP), and the Status Report. We assume there will be an opportunity for stakeholder review and comment before the documents are submitted to EPA. If this is not the case, we request ODEQ incorporate a stakeholder review/comment period into the schedule.
- iii. **Reference to Key Deliverables #1 Priority Action Plan, page 3 (and page 7)** – Under this section (and on page 7), there is an acronym, PCAP, but it is not defined. For clarity, we request ODEQ define or revise this acronym.
- iv. **Reference to Key Deliverables #1 Priority Action Plan, page 3** – ODEQ states it will develop a preliminary GHG inventory. It would be beneficial to the oil and gas industry if ODEQ provided more information on how it will maximize the use existing reported data (e.g., EPA's GHGI, GHGRR and the New Source Performance Standards (NSPS OOOOa)) to reduce the impacts on oil and gas operators and provide additional information on what information will be needed from oil and gas operators for this effort. Additionally, EPA is proposing revisions to Subpart W that will allow states to obtain comprehensive state-specific emissions information.
- v. **Reference to Key Deliverables #1 Priority Action Plan, page 3** – ODEQ states it will assist the top five (5) industrial sectors in evaluating potential pollution reductions for inclusion in the CAP. It is unclear if ODEQ has already identified these industrial sectors and will ODEQ further break this down into emission sources that may cross industrial sectors. We request ODEQ provide more clarity on this issue.



- vi. **Methane Detection and Reduction, page 4 and 5** – ODEQ discusses the use of optical gas imaging (OGI) in aerial surveys. OGI is the standard to identify emission leaks and combining it with aerial surveying, reduces survey time; however, accurate quantification of those leaks using aerial OGI is still developing. Another monitoring technology may be required since quantification of the methane emissions is necessary to develop accurate emission factors. We welcome the opportunity to collaborate with ODEQ on this effort.
- vii. **Renewable Energy Analysis, page 5** – ODEQ plans to review the costs and benefits of electrification of natural gas compression in various regions in Oklahoma to relieve demand on electrical transmission lines. More electrification may complicate the reliability of the existing grid system in peak demand and emergency situations (e.g., Winter Storm Uri). Additionally, electrification of gas compression will increase demand on the electric transmission system contrary to the statement on page 5. ODEQ must factor this into its calculations.

3. Implementation Grant

ODEQ's presentation referenced EPA's CPRG Implementation Phase. EPA's website states that these grants are for the "...expeditious implementation of investment-ready policies, programs, and projects to reduce greenhouse gas emissions in the near term." In the oil and gas industry, there are projects that can be immediately implemented. ODEQ should apply for and consider:

- i. Prioritizing implementation funding to oil and gas operators for projects that will provide the greatest emission reductions at the lowest costs. This may include, but not limited to retrofitting, upgrading or replacing natural gas emitting equipment, funding operators to purchase available equipment to find and fix leaks, installing onsite monitoring equipment and/or systems, installing alarms/alerts to notify oil and gas operators of equipment malfunctions and emission leaks, and conducting facility design reviews and/or the reconfiguration of a facilities to reduce emissions. This will maximize the use of taxpayer funds and emission reductions for Oklahoma.
- ii. Prioritizing implementation funding to conduct education/outreach/training for the oil and gas industry, especially smaller oil and gas operators. This may include, but is not limited to, training on how to comply with EPA's forthcoming rules e.g., NSPS OOOOb/c, Subpart W and Waste Emission Charge, the best practices and/or innovative technologies to use to reduce/eliminate emissions at oil and gas sites, cost effective electronic emission data management systems, and how to calculate methane emissions in accordance with EPA's forthcoming rules. The Alliance welcomes any opportunity to work with ODEQ to host education/outreach/training for oil and gas operators at its office in Oklahoma City.

The Alliance appreciates the opportunity to comment on ODEQ's CPRG Plan. If you have questions, please contact me at 405-601-2124.

Sincerely,

Angie Burckhalter

Senior V.P. of Regulatory & Environmental Affairs

From: [L&D Innovations](#)
To: [DEQ CPRGOK](#)
Subject: [EXTERNAL] L & D part 2
Date: Friday, September 15, 2023 2:40:18 PM
Attachments: [Gmail - OFFICIAL PUBLIC COMMENT.pdf](#)
[Gmail - Grant participation letter without personal names.pdf](#)

DEQ

We just wanted to include; a bit of credibility, a pdf version, and our mission statement.

MISSION STATEMENT:

To be a diligent service for our environmentally conscious, collaborative communities by providing efficient economical solutions of well defined green products through redirecting common waste, utilizing innovative farmocological practices to upcycle unwanted organic material including rain water, while scientifically reversing climate change to produce healthy, bio-complete supplemental topsoil by the bucket or the truck load, never packaged in plastic.

L & D INNOVATIONS LLC
thislandwasmade4uandme@gmail.com



L&D Innovations <dirtfarm.soilsolutions@gmail.com>

OFFICIAL PUBLIC COMMENT

1 message

L&D Innovations <dirtfarm.soilsolutions@gmail.com>
To: CPRGOK@deq.ok.gov

Fri, Sep 15, 2023 at 9:39 AM

To: Oklahoma Department of Environmental Quality
707 North Robinson Avenue
Oklahoma City, OK 73102

L & D INNOVATIONS LLC is officially requesting an initial investment of a \$2.8 million grant to begin planning solutions for central Oklahoma during what is left of this calendar year, and the first two months of 2024 being January and February, for the initial purposes of creating a clean energy environment. Not only for Oklahoma County but with intentions to become an enterprise. To eventually be available for franchise opportunities across the states and inevitably world wide. The opportunity for Oklahoma to become the first impeccable example and founding location for our establishment is being offered here in this request of public comment from Oklahoma's Department of Environmental Quality.

We here at L & D Innovations LLC have partnered with consultants and have knowledge to help America transition to a low carbon economy. Starting with Oklahoma of course. With proper grant funding we can employ updated tactics and new actions within the next two years. By 2027 (with governmental support now made available, policies and program developments put into place) we can potentially deliver scientific data to measurably prove our efforts for; cleaner air, cleaner healthy soil, and more nutritious food here in central Oklahoma compared to what is currently available to our local consumers.

L & D is not interested in implementing tactics against emissions, other than to counterbalance their effects in real attempts to reverse climate change as soon as possible.

Instead we are interested in creating; learning opportunities for all k-12 students virtually, multiple jobs for a large variety of career backgrounds and an ongoing internship program through local universities in an array of subjects. Again, with proper funding, we can communicate updates to our environmentally conscious community and campaign motivation with other communities to spread awareness of convenient, effective, efficient daily activities that according to our (off record) marketing studies will be adopted as a current culture. Once all people begin to realize that "We the people" are capable of correcting our industrial sized mistakes from toddling into our beloved disposable era, their physiques and psyches will naturally follow suit.

While traveling the state looking for community engagement must seem worthwhile, I can assure you: I have a very realistic vision. I am a Chickasaw and Choctaw native Oklahoman, with a very unique position of gaining vast amounts of knowledge from several perspectives and I have been called to this global cry. This has given me a vision that is all encompassing of solutions that are being desperately sought after, far and wide. Government entities, sovereign nations, non-profit organizations, profitable businesses, farmers, ranchers, consumers of all sorts, most sorts of associations, private sectors, certainly caring parents, children, knowledgeable students, graduated students that didn't receive the educations they signed up for, all who are looking for answers and some who intrinsically realize our living reality is not inline with nature are willing to adopt and adapt to different ways of carrying out their actions of daily living for an exchange of a healthier, safer existence. The moment in which: we must decide together, every detail about how to live harmoniously with the convenience of new technology AND nature has passed us by. Oklahoman's are at risk right now. We all know this fact because of our social health and also, receiving a Nonattainment designation from the Federal Environmental Protection Agency, due to high ground-level ozone and particulate matter concentrations found in and around central Oklahoma.

A massive migration of people are seeking out Oklahoma for new homes. Solutions are up to us, as a state of: sanctuary . For us and others to continue, our existence must consist of a better balanced symbiotic relationship with our Earth. This accommodation is imperative or else our existence is questionable. This planet has obviously demonstrated IT IS capable of wiping (the rest of) us off of its face... like temporary face paint on game day or a carnival outing.

The DEQ is asking for innovative input and collaboration. Clearly stated, repeatedly during the OPEN TO PUBLIC CPR Grant meeting recorded August 30th 2023. (according to youtube, not much exposure) (yet)

As L & D attended The Crossroads Conference with the Oklahoma Soil Conservation Commission in Enid over the summer we recognized how we could relieve stress on our farmers and ranchers statewide.

We here at L & D were also present for The Regional Nitrogen Usage Efficiency Conference held at Oklahoma State University last month. We listened as several doctors spoke about grave mistakes made advising our food producers over the past few decades and how new technologies have emerged but a gap remains between the science and the fields. We as L & D believe and see how we can help bridge that gap.

Then, yesterday we heard our state's Lieutenant Governor speak at the American Indian Chamber of Commerce luncheon at the beautiful First Americans Museum in Oklahoma City. Matt Pinnell was looking to the great citizens of Oklahoma as business owners to: step up our game as a state and represent Oklahoma as the great, caring, innovative people we have proven to be in the past. (I am paraphrasing.)

THIS IS MY STAND

We are "investment ready" and we are offering you an opportunity to collaborate with us to make a better difference in our air quality, soil quality and in turn our quality of living. By delegating ongoing plans for funding through the EPA primarily for developing dependable data and repeatable solutions to recurrent problems for an immeasurable amount of time for the sake of mankind. We will be seeking collaboration and funding from the Oklahoma Association of Conservation Districts. We will be requesting the support from Chickasaw Nation Environmental Services to call on additional EPA funding for 2024. As well as recruiting support to convene with The Association of Central Oklahoma Governments. To cooperate with the city of Edmond and their well developed plans for their community's future.

All these endeavors of "change" will require "all hands on deck" so to speak, especially concerning funds from each department. Funding will also be sought from other national and international grants. Rest assured humans are the answer to solving the world's problems. We, as humans, have knowledge and the power to facilitate ecosystems in a much better manner than shown thus far. We here at L & D are willing to collaborate with everybody proving helpful moving forward. Now let's stand together and prove it.

What?

"Say."

"You."

"?"

Contact us for our mission statement and/or any additional information or collaboration

Lindsay & Destin McDonald
L & D INNOVATIONS LLC
405)365-7884
thislandwasmade4uandme@gmail.com



L & D Innovations LLC <thislandwasmade4uandme@gmail.com>

Grant participation letter

1 message

Mighty Fine Farms LLC <mightyfinefarming@gmail.com>
To: thislandwasmade4uandme@gmail.com

Wed, Sep 13, 2023 at 11:12 PM

Grant Participation Letter

Mighty Fine Farms LLC

Dear,
– L & D Innovations LLC

I am writing to describe my role and participation in your upcoming research program, evaluating the use of carbon sink measures in reducing greenhouse gas emissions. Here at Mighty Fine Farms, we are developing new methods to reduce these emissions and share our approaches with other small and underserved farmers. As an early adopter of these processes, our organization is in an excellent position to provide more quantitative feedback on the product and process performance.

We look forward to providing you and your team with updates on how the product and processes are achieving more climate smart agricultural practices, we are acutely aware of the shortage of options in reducing the use of nitrogen fertilizer. We are eager to continue working with L & D Innovations and wish you the best of success with your proposal to fund this critical work.

Very best regards,
Mighty Fine Farms

From: [L&D Innovations](#)
To: [DEQ CPRGOK](#)
Subject: [EXTERNAL] OFFICIAL PUBLIC COMMENT
Date: Monday, September 18, 2023 11:22:16 AM

To: Oklahoma Department of Environmental Quality
707 North Robinson Avenue
Oklahoma City, OK 73102

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designation from the Federal Environmental Protection Agency, due to high ground-level ozone and particulate matter concentrations found in and around central Oklahoma.

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