

## Stallworth, Holly

---

**From:** Kelly Robbins <krobbins@aipro.org>  
**Sent:** Friday, March 14, 2014 10:16 AM  
**To:** Stallworth, Holly  
**Subject:** FW: Clean Air Scientific Advisory Committee--NAAQS recommendations

FYI...

The message below was sent yesterday and was returned as not deliverable. My apologies and I trust that our comment will still be accepted & considered.

Sincerely,

/s/

J. Kelly Robbins  
1401 West Capitol Avenue, Suite 440  
Little Rock, AR 72201  
[krobbins@aipro.org](mailto:krobbins@aipro.org)  
(501) 975-0565  
Twitter @AIPROorg



---

**From:** Kelly Robbins [mailto:krobbins@aipro.org]  
**Sent:** Thursday, March 13, 2014 1:52 PM  
**To:** 'stallworth.holly@epa.gov'  
**Subject:** Clean Air Scientific Advisory Committee--NAAQS recommendations

To: Clean Air Scientific Advisory Committee (CASAC) Ozone Review Panel  
Attention: Dr. Holly Stallworth, Designated Federal Officer (DFO)

I am writing to you today on behalf of the Arkansas Independent Producers & Royalty Owners Association (AIPRO), which serves all facets of Arkansas' oil and natural gas production community. AIPRO supports clean air for our state, nation and in the communities where our operations and royalty owners reside. We are pleased that air quality has improved significantly over recent years. In fact, in 2012 U.S. carbon dioxide (CO<sub>2</sub>) emissions resulting from energy use declined to the lowest first quarter numbers since 1992. Such improvements in air quality will surely continue as the 2008 ozone standards, the tightest standards ever, are implemented.

We can build on this progress without going to the stricter and potentially very damaging Ozone NAAQS standards EPA may soon be proposing, and we are writing to urge CASAC to finish its review and include the retention of the existing standards in the proposal. We believe that a fair analysis of the record will show retaining the existing standard of 75 parts per billion is the right policy choice. Strict new standards are not justified from a health perspective and are not needed to continue air quality progress.

We can all agree that sensible government regulations contribute to the protection of safety and health without impeding energy development, job creation, and economic growth. And we all want a clean and healthy environment for ourselves, our neighbors and our families. However, further tightening the 2008 ozone standards – the most stringent ozone standards ever – is a major concern because of the potential cost, reach and impact on the economy, and the lack of air quality benefits.

The US is making progress toward meeting the current standards and air quality will continue to improve as we continue to reduce emissions that form ozone. EPA and the states are just beginning to develop the plans to meet the previous 2008 ozone standards, so EPA should not be changing the standards now before those efforts can be fully undertaken.

For these reasons, AIPRO hopes that any recommendation from CASAC to EPA will include the current 75 ppb standard for consideration and for any new standards.

Many thanks for your service and for the opportunity to provide comments and suggestions in this important matter.

Sincerely,

/s/

J. Kelly Robbins  
1401 West Capitol Avenue, Suite 440  
Little Rock, AR 72201  
[krobbins@aipro.org](mailto:krobbins@aipro.org)  
(501) 975-0565  
Twitter @AIPROorg

