



August 7, 2023

Submitted electronically via: www.regulations.gov and GHGReporting@epa.gov

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Subject: Comment Deadline Extension Request for Docket Id. No. EPA-HQ-OAR-2023-0234, Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems, and a Request for a Public Hearing that includes a Presentation on the Proposed Changes

Dear Mr. Regan:

The Petroleum Alliance of Oklahoma, the Independent Petroleum Association of America and Western Energy Alliance (collectively referred to as the Trades) request the Environmental Protection Agency (EPA) extend the public comment period by an additional 60-days for Docket Id. No. EPA-HQ-OAR-2023-0234, Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems (Proposed Rule). In addition, we request EPA conduct a public hearing that includes a presentation on the proposed changes.

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.

The Independent Petroleum Association of America is a national upstream trade association representing thousands of independent oil and natural gas producers and service companies across the United States. Independent producers develop 91 percent of the nation's oil and natural gas wells. These companies account for 83 percent of America's oil production, 90 percent of its natural gas and natural gas liquids production, and support over 4.5 million American jobs.

Western Energy Alliance is the leader and champion for independent oil and natural gas companies in the West. Working with a vibrant membership base for over 50 years, Western Energy Alliance



stands as a credible leader, advocate, and champion of industry. Our expert staff, active committees, and committed board members form a collaborative and welcoming community of professionals dedicated to abundant, affordable energy and a high quality of life for all. The majority of independents are small businesses, with an average of fourteen employees.

The Proposed Rule was published in the Federal Register on August 1, with a comment deadline of October 2. This Proposed Rule includes 160 pages of text along with 136 supporting documents that encompass hundreds if not thousands of pages of supporting material. The Trades do not think the 60-day comment period is adequate to fully review the Proposed Rule and supporting material and provide meaningful comments on such a short timeline.

EPA currently has three proposed Greenhouse Gas Reporting Rules (GHGRRs) that have not been finalized: EPA's initial proposed GHGRR (87 Fed. Reg. 36920, June 21, 2022), the Supplemental Proposed Rule (88 Fed. Reg. 32852, May 22, 2022) and this Proposed Rule for Subpart W for the petroleum and natural gas systems. In addition, EPA's proposed New Source Performance Standards for new and existing oil and gas sources (NSPS b/c), integral to the GHGRRs, are still not finalized, adding an additional level of complexity to the review process of the Proposed Rule. Taken together, these proposed rules are expansive and provide significant uncertainty as to how they collectively build upon and/or function together. The Trade's members need the additional 60-day review time to carefully review the Proposed Rule in context with the other proposed rules to better understand the cumulative costs impacts and requirements in order to provide fully informed comments.

EPA states its Proposed Rule revisions will improve the quality and consistency of the data collected under the rule, streamline and improve implementation, and clarify or propose minor updates to certain provisions that have been the subject of questions from reporting entities. The requested 60-day extension to the comment period will not cause hardship on the EPA nor will it create impacts on the environment or human health. Providing additional time will ensure the Trade's members have an opportunity to adequately review the information and provide useful comments that will benefit the EPA's decision-making process.

Finally, the Trade's request EPA conduct a public hearing and include a presentation on the proposed changes that would further the Trade's understanding of the Proposed Rule.

Given the consequences of the Proposed Rule on the Trade's members, and the breadth, depth, and complexity of the information involved, the Trades request EPA extend the comment period for the Proposed Rule by an additional 60-days and conduct a public hearing that includes a presentation of the proposed changes.



Thank you for your consideration of this request.

Sincerely,

Angie Burckhalter
Sr. V.P. of Regulatory and Environmental Affairs

Daniel T. Naatz
Executive Vice President & Chief Operating Officer
Independent Petroleum Association of America (IPAA)

Kathleen M. Sgamma
President
Western Energy Alliance

cc: Jennifer Bohman