



January 30, 2024

Filed Electronically
U.S. Environmental Protection Agency
EPA Docket Center, Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention Docket ID No. EPA-HQ-OAR-2023-0434

RE: Request for 30-Day Comment Period Extension on the Proposed Rule - Waste Emissions Charge for Petroleum and Natural Gas Systems

Dear Mr. Ragnauth,

The Independent Petroleum Association of America (IPAA) respectfully requests a 30-day extension of the public comment period for the Environmental Protection Agency's (EPA) Proposed Rule, "Waste Emissions Charge for Petroleum and Natural Gas Systems ("WEC Rule") [89 FR 5318].

IPAA has represented independent oil and natural gas producers for more than 90 years. IPAA represents the thousands of independent oil and natural gas producers and service companies across the United States. America's 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 (NGL) production, and support over 4.5 million American jobs.

EPA has failed to adequately recognize and address the myriad crosscutting issues among the WEC Rule, EPA's proposed Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas System ("Subpart W Rule") [88 FR 50282], and EPA's proposed New Source Performance Standards and Emission Guidelines for Crude Oil and Natural Gas Facilities: Climate Review ("Methane Rule") [87 FR 74702]. EPA has also failed to recognize the risks to the workability and durability of these rules posed by an inadequately coordinated rulemaking process.

IPAA believes a 30-day extension of the WEC Rule comment period is both necessary and reasonable in order for IPAA staff and its members to fully analyze the proposed WEC Rule and its connections to the Subpart W Rule and Methane Rule, develop comments, and inform EPA's final rule. Thank you for your prompt consideration of this request.

Sincerely,

Dan Naatz
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