



July 25, 2025

The Honorable Lee Zeldin, Administrator
The Honorable David Fotouhi, Deputy Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20004

RE: RIN:2060-AW261: Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review.

Dear Administrator Zeldin and Deputy Administrator Fatouhi,

We are writing on behalf of the Domestic Energy Producers Alliance (DEPA) and the Independent Petroleum Association of America (IPAA). Our member companies urgently request that EPA promptly extend the compliance deadline for submitting the annual report under EPA's Oil and Gas Methane Rule, which is currently due on August 5, 2025. The EPA can accomplish this by promptly issuing a Federal Register notice extending the current annual reporting deadline, or by issuing a direct final rule to extend the annual reporting deadline for one year under its general authorities.

This extension is not only necessary but also crucial to enable the EPA to align its plans for the Methane Rule with other related actions taken by the Agency and Administration regarding the growth of the energy sector and the return of power to the States. It would also be consistent with the stay of the litigation challenging the Methane Rules in the D.C. Circuit, Court of Appeals, obtained by EPA based on EPA's announcement that it is reconsidering the Methane Rule.

The first annual report under the Methane Rule is due August 5. However, the process of collecting the data and preparing these reports is highly onerous and resource-intensive, imposing significant burdens on American energy producers. As the rule is under reconsideration, enforcement of the associated compliance deadlines is inconsistent with the President's policies for achieving Energy Dominance, particularly when the EPA is reconsidering the Methane Rule, a process whose results might ultimately render the onerous requirement moot.

Furthermore, extending this compliance deadline would be consistent with several other compliance deadline extensions issued by the EPA for other Clean Air Act regulations, as the Agency reconsiders significant changes to Biden-EPA policies (including the air toxics rule for

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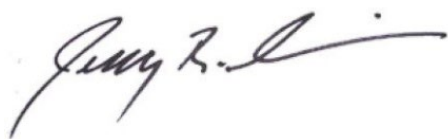
the iron and steel sector, coke ovens, and the aerosol coatings rule). EPA has recently extended several other major reporting deadlines under different regulations, such as the Greenhouse Reporting Rule and TSCA Section 8(a)(7) PFAS reporting requirements. In addition, EPA has initiated formal steps to reverse the "endangerment" finding for greenhouse gases, an action that goes to the heart of the Methane Rule.

DEPA represents a diverse coalition of energy producers, individuals, and organizations dedicated to responsible domestic energy development, while advocating for policies that promote American energy independence. DEPA is a non-partisan association seeking common ground, in common-sense solutions to the challenges facing American oil and natural gas production. Our member companies are dedicated to meeting environmental standards while maintaining the economic viability that supports American jobs and energy security.

IPAA is headquartered in Washington, D.C. where the association serves as an informed voice for the exploration and production segment of the industry and advocates its members' views before the United States Congress, The White House, and federal agencies. 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

We respectfully urge EPA to act swiftly on this request to provide regulatory certainty for our industry during this period of policy reconsideration.

Sincerely,



Jerry Simmons
President/CEO
The Domestic Energy
Producers Alliance (DEPA)



Dan Naatz
Chief Operating Officer/EVP
Independent Petroleum
Association of America (IPAA)

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