Filed: 09/11/2023

# IN THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

COALITION FOR RENEWABLE NATURAL GAS,	) ) )
Petitioner,	)
v.	) Case No. 23-1248
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY,	) )
Respondent.	) ) )

### **PETITION FOR REVIEW**

Pursuant to Rule 15 of the Federal Rules of Appellate Procedure and Section 307(b) of the Clean Air Act, 42 U.S.C. §7607(b), Coalition for Renewable Natural Gas ("RNG Coalition") hereby petitions the Court for review of final agency action by the U.S. Environmental Protection Agency ("EPA") entitled "Renewable Fuel Standard (RFS) Program: Standards for 2023-2025 and Other Changes," published at 88 Fed. Reg. 44,468 (July 12, 2023). Such challenge is timely under 42 U.S.C. §7607(b) and properly before the D.C. Circuit.

A copy of the final agency action is attached to this petition.

## Respectfully submitted,

### /s/ Sandra P. Franco

Sandra P. Franco Franco Environmental Law, LLC 600 Pennsylvania Avenue, SE Unit 15577 Washington, DC 20003 T 202 256-6115 sandra@francoenvironmentallaw.com

Filed: 09/11/2023

Counsel for Coalition for Renewable Natural Gas

### Of Counsel:

David Cox General Counsel COALITION FOR RENEWABLE NATURAL GAS 1017 L Street, #513 Sacramento, CA 95814

Dated: September 11, 2023

Filed: 09/11/2023

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### **RULE 26.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, Coalition for Renewable Natural Gas ("RNG Coalition") makes the following disclosure:

RNG Coalition has no parent companies, and no publicly held company has a 10% or greater ownership interest. It has not issued shares or debt securities to the public.

RNG Coalition is a non-profit association of companies and organizations dedicated to the advancement of renewable natural gas as a clean, green, alternative, and domestic energy and fuel resource. It advocates on behalf of its members and provides education for the public in support of the sustainable

development, deployment, and utilization of renewable natural gas, including participating in regulatory proceedings and litigation involving implementation of the Renewable Fuel Standard program by EPA, as well as other regulatory actions that may impact the renewable natural gas industry. RNG Coalition's membership includes companies throughout the value chain of waste feedstock conversion to transportation fuel under the Renewable Fuel Standard program. It is a "trade association" as defined in Circuit Rule 26.1(b).

Respectfully submitted,

/s/ Sandra P. Franco

Sandra P. Franco Franco Environmental Law, LLC 600 Pennsylvania Avenue, SE Unit 15577 Washington, DC 20003 T 202 256-6115 sandra@francoenvironmentallaw.com

Filed: 09/11/2023

Counsel for Coalition for Renewable Natural Gas

#### Of Counsel:

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#### **CERTIFICATE OF SERVICE**

Pursuant to Rule 25(d) of the Federal Rules of Appellate Procedure, I hereby certify that I caused the foregoing Petition for Review and Rule 26.1 Statement to have been served by United States first-class mail this 11th day of September, 2023 upon each of the following:

HON. MICHAEL S. REGAN, Administrator U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Mail Code 1101A Washington, D.C. 20460 Correspondence Control Unit Office of General Counsel U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW Mail Code: 2310A Washington, D.C. 20460 HON. MERRICK B. GARLAND Attorney General TODD SUNHWAE KIM Assistant Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530

And to have an electronic copy (including a copy of the Federal Register notice) be provided via electronic mail to: John H. Martin (john.h.marting@usdoj.gov) and Kimere J. Kimball (kimere.kimball@usdoj.gov).

/s/ Sandra P. Franco
Sandra P. Franco