

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

AIR ALLIANCE HOUSTON, CLEAN
AIR COUNCIL, and
ENVIRONMENTAL INTEGRITY
PROJECT,

Petitioners,

v.

No. 24-1118

U.S. ENVIRONMENTAL
PROTECTION AGENCY and
MICHAEL REGAN, Administrator,
U.S. Environmental Protection Agency,

Respondents.

PETITION FOR REVIEW

Pursuant to Clean Air Act § 307(b)(1), 42 U.S.C. § 7607(b)(1), Rule 15 of the Federal Rules of Appellate Procedure, and D.C. Circuit Rule 15, Air Alliance Houston, Clean Air Council, and Environmental Integrity Project (“Petitioners”) hereby petition this Court for review of the final action taken by Respondents U.S. Environmental Protection Agency and Administrator Michael Regan, published at 89 Fed. Reg. 16,820 (March 8, 2024) and titled “Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review” (attached). Petitioners seek review of certain discrete aspects of the final rule concerning the required

destruction efficiency for flares and other control devices and the monitoring for these control devices.

DATED: May 7, 2024

Respectfully submitted,

/s/ Patton Dycus

Patton Dycus

Environmental Integrity Project

919 Millworks Way

Bozeman, MT 59715

(404) 446-6661

pdycus@environmentalintegrity.org

Counsel for Petitioners

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

AIR ALLIANCE HOUSTON, CLEAN
AIR COUNCIL, and
ENVIRONMENTAL INTEGRITY
PROJECT,

Petitioners,

v.

No. 24-1118

U.S. ENVIRONMENTAL
PROTECTION AGENCY and
MICHAEL REGAN, Administrator,
U.S. Environmental Protection Agency,

Respondents.

RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, Air Alliance Houston, Clean Air Council, and Environmental Integrity Project make the following disclosures:

Air Alliance Houston

Non-Governmental Corporate Party to this Action: Air Alliance Houston.

Parent Corporations: None.

Publicly Held Company that Owns 10% or More of Party's Stock: None.

Party's General Nature and Purpose: Air Alliance Houston, a corporation organized and existing under the laws of the State of Texas, is a nonprofit organization working to reduce air pollution in the Houston region to protect

public health and environmental integrity through research, education, and advocacy.

Clean Air Council

Non-Governmental Corporate Party to this Action: Clean Air Council (“CAC”).

Parent Corporations: None.

Publicly Held Company that Owns 10% or More of Party’s Stock: None.

Party’s General Nature and Purpose: CAC is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania. CAC is a not-for-profit organization focused on protection of public health and the environment.

Environmental Integrity Project

Non-Governmental Corporate Party to this Action: Environmental Integrity Project (“EIP”).

Parent Corporations: None.

Publicly Held Company that Owns 10% or More of Party’s Stock: None.

Party’s General Nature and Purpose: EIP, a corporation organized and existing under the laws of the District of Columbia, is a national non-profit organization that advocates for more effective enforcement of environmental laws.

DATED: May 7, 2024

Respectfully submitted,

/s/ Patton Dycus

Patton Dycus

Environmental Integrity Project

919 Millworks Way

Bozeman, MT 59715

(404) 446-6661

pdycus@environmentalintegrity.org

Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing **Petition for Review** and **Rule 26.1 Disclosure Statement** on Respondents by sending a copy (minus the 408-page attachment) to each of the following addresses on this 7th day of May, 2024:

Via Certified Mail, Return Receipt Requested:

Correspondence Control Unit
Office of General Counsel (2311)
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Via First Class Mail:

Michael Regan
United States Environmental Protection Agency
Office of the Administrator (1101A)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Merrick B. Garland
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

/s/ Patton Dycus
Patton Dycus