



**ASSISTANT ADMINISTRATOR FOR AIR AND RADIATION**

WASHINGTON, D.C. 20460

December 19, 2024

Ms. Wendy Kirchoff  
Senior Vice President of Policy  
American Exploration & Production Council

Via Electronic Mail: [wendy.kirchoff@axpc.org](mailto:wendy.kirchoff@axpc.org)

Dear Ms. Kirchoff:

This letter concerns the administrative petition of the Final Rule “Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems.” 89 Fed. Reg. 42,062 (May 14, 2024) that you submitted on July 15, 2024, on behalf of American Exploration & Production Council. One of the issues raised in your petition is related to the requirement to measure rod packing emissions for reciprocating compressors, including those that elect to replace rod packing on or before 8,760 hours of operation pursuant to 40 CFR 60.5385b(d)(3). Without making a determination as to whether this issue meets the criteria for reconsideration under CAA section 307(d)(7)(B), the U.S. Environmental Protection Agency (EPA) intends to issue a Federal Register notice initiating a rulemaking process, including public notice and comment, on this issue. At this time, we are not responding to the other issues raised in the petition, which we are continuing to review.

Separate from the issue identified above, the EPA is also taking the opportunity to inform you that we have recently updated our Frequently Asked Questions to provide additional clarification on the Final Rule. Please see our page on Frequently Asked Questions on subpart W at <https://ccdsupport.com/confluence/display/faq/Subpart+W.+Petroleum+and+Natural+Gas+Systems> for more information.

We thank you for your continuing interest in this rule, and we look forward to hearing from you during the upcoming rulemaking process on this issue. If you have any questions regarding this letter, please contact Stephanie Bogle at 202-343-9179 or by email at [Bogle.Stephanie@epa.gov](mailto:Bogle.Stephanie@epa.gov).

Sincerely,

Joseph Goffman  
Assistant Administrator, Office of Air and Radiation

cc: Andrea Carrillo, EPA Office of General Counsel, Air and Radiation Law Office  
Paul Gunning, EPA Office of Air and Radiation, Office of Atmospheric Protection