



OFFICE OF AIR AND RADIATION

WASHINGTON, D.C. 20460

March 26, 2025

Mr. Aaron Padilla
Vice President, Corporate Policy
American Petroleum Institute
Via Electronic Mail: padillaa@api.org

Dear Mr. Padilla:

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 the American Petroleum Institute.

The U.S. Environmental Protection Agency (EPA) intends to issue a Federal Register notice initiating a rulemaking process, including public notice and comment, for subpart W of the Greenhouse Gas Reporting Program that includes the issues identified in your petition (e.g., flare destruction efficiencies; the instantaneous threshold for other large release events; whether emissions from stationary combustion must be reported under subpart C or subpart W of the GHGRP; the enhancement or undetected leak “k” factor; tank sensors not connected to Supervisory Control and Data Acquisition (SCADA)). Thus, at the EPA’s discretion, the Agency is granting the petition for reconsideration, in so far as we are initiating an additional public comment process on the issues raised in your petition. At this time, the EPA has not determined any specific provision(s) to be proposed concerning the issues in your petition.

If you have any questions regarding this letter, please contact Stephanie Bogle at (202) 343-9179 or by email at bogle.stephanie@epa.gov. 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.

Sincerely,

Abigale Tardif
Principal Deputy Assistant Administrator

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