



## OFFICE OF AIR AND RADIATION

WASHINGTON, D.C. 20460

March 26, 2025

Mr. James Elliott  
Counsel for Producer Associations  
Spilman Thomas & Battle, PLLC  
*Via Electronic Mail:* [jelliott@spilmanlaw.com](mailto:jelliott@spilmanlaw.com)

Dear Mr. Elliott:

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 October 25, 2024, on behalf of the Producer Associations (e.g., Independent Petroleum Association of America, Arkansas Independent Producers and Royalty Owners, Domestic Energy Producers Alliance, Eastern Kansas Oil & Gas Association, Gas and Oil Association of West Virginia, Illinois Oil & Gas Association, Independent Petroleum Association of New Mexico, Indiana Oil and Gas Association, International Association of Drilling Contractors, Kansas Independent Oil & Gas Association, Kentucky Oil & Gas Association, Michigan Oil and Natural Gas Association, National Stripper Well Association, North Dakota Petroleum Council, Ohio Oil and Gas Association, Panhandle Producers & Royalty Owners Association, Pennsylvania Independent Oil & Gas Association, Permian Basin Petroleum Association, Petroleum Alliance of Oklahoma, Petroleum Association of Wyoming, Texas Alliance of Energy Producers, Texas Independent Producers & Royalty Owners Association, and Western Energy Alliance).

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., calculation methods used to estimate sources at gathering and boosting facilities; the instantaneous threshold for other large release events). 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](mailto: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,

A handwritten signature in black ink, appearing to be 'AT' or 'Abigale Tardif'.

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