



November 24, 2021

Via Email

Office of Information and Regulatory Affairs
725 17th Street, NW
Washington, DC 20503
Attention: Desk Officer for the EPA
OIRA_submission@omb.eop.gov

RE: Request for Extension of Comment Period on ICR Associated With EPA's Proposed Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review – Dkt. No. EPA-HQ-OAR-2021-0317 - EPA Tracking No. 2523.04, OMB Control No. 2060-0721.

Dear Madam/Sir:

GPA Midstream Association (GPA Midstream) respectfully requests that the Office of Management and Budget (OMB) provide a minimum of a 30-day extension of the comment period on its review of the Information Collection Request (ICR) in the Environmental Protection Agency's Proposed Rule on Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review (Proposal) – Docket ID No. EPA-HQ-OAR-2021-0317.¹

GPA Midstream has served the U.S. energy industry since 1921 and has nearly 60 corporate members that directly employ more than 56,000 employees that are engaged in a wide variety of services that move vital energy products such as natural gas, natural gas liquids ("NGLs"), refined products and crude oil from production areas to markets across the United States, commonly referred to as "midstream activities." The work of our members indirectly creates or impacts an additional 320,000 jobs across the U.S. economy. GPA Midstream members recover close to 90% of the NGLs such as ethane, propane, butane, and natural gasoline produced in the United States from more than 380 natural gas processing facilities. In the 2017–2019 period, GPA Midstream members spent over \$50 billion in capital improvements to serve the country's needs for reliable and affordable energy.

¹ 86 Fed. Reg. 63,110 (Nov. 15, 2021). The ICR is found at <https://www.regulations.gov/document/EPA-HQ-OAR-2021-0317-0144>.

GPA Midstream has actively participated in the public process for EPA's regulation of air emissions from oil and gas sources, dating back to the EPA's initial OOOO proposal more than a decade ago. We have always sought to provide meaningful and constructive comments and to bring our industry technical expertise to EPA's rulemaking efforts. EPA, however, currently provides only a 60-day comment period on the Proposal – and an even shorter 30-day comment period for comments to OMB on the ICR. These timeframes are insufficient to permit stakeholders to provide meaningful comment, especially in view of the expansive set of issues for which EPA has explicitly asked for comment. EPA's own compilation of just the items on which it explicitly solicits input spans 30 pages and includes some 186 separate requests for comment.² The ICR component includes detailed reporting and recordkeeping and associated cost information and assumptions.³ The agency must allow stakeholders an adequate opportunity to provide comment and this includes sufficient time to actually consider the expansive Proposal and related ICR demands.

In sum, given the breadth and complexity of the issues raised and the economic significance of the types of regulation contemplated by the Proposal, we respectfully submit that an extension would assist GPA Midstream in providing meaningful comments. Accordingly, we respectfully request that OMB extend the comment period for comments on the ICR be extended by a minimum of 30 days.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Hite". The signature is fluid and cursive, with the first name "Matt" and last name "Hite" clearly distinguishable.

Matt Hite

Vice President of Government Affairs
GPA Midstream Association

² EPA, Proposed Rule Summary of Comment Solicitations (Nov. 1, 2021), available at <https://www.regulations.gov/document/EPA-HQ-OAR-2021-0317-0028>.

³ *E.g.*, ICR at 5-16; EPA-HQ-OAR-2021-0317-0144_attachment_1.