

June 28, 2022

Jennifer Bohman  
Climate Change Division  
Office of Atmospheric Programs (MC-6207A)  
Environmental Protection Agency  
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Washington, DC 20460  
(202) 343-9548  
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Submitted via e-mail and regulations.gov

**Re: Comment Deadline Extension Request: Proposed Rule, Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule; Docket Id. No. EPA-HQ-OAR-2019-0424**

Dear Ms. Bohman:

GPA Midstream Association (“GPA”) respectfully requests an extension deadline of the public comment period for the U.S. Environmental Protection Agency’s (“EPA”) proposed rulemaking titled “Revisions and Confidentiality Determinations for Data Elements Under the Greenhouse Gas Reporting Rule,” 87 Fed. Reg. 36,920 (Jul. 21, 2022). The comment deadline is currently August 22, 2022, and we request a 30-day extension to September 21, 2022.

The summary section of the Federal Register notice of the proposed rule explains that the proposal is intended to improve the quality and consistency of the data collected under EPA’s Greenhouse Gas (“GHG”) Reporting Rule, streamline and improve the reporting rule’s implementation, and clarify or propose minor updates to certain provisions that have been the subject of questions from reporting entities.

GPA and its members have worked with EPA since 2009 to improve, streamline, and clarify the requirements of 40 C.F.R. Part 98, and we appreciate that many of EPA’s proposed changes are responsive to information that GPA has previously submitted to EPA. We also appreciate EPA’s efforts to find ways to reduce reporter burdens in addition to the specific requests GPA has made.

GPA notes that the proposed rule would also add new emission sources and reporting elements to the GHG reporting rule program and significantly change how some emissions are calculated. To accomplish

the many goals of the proposed rule, EPA has included over 150 proposed changes that would directly impact natural gas gathering and boosting and onshore natural gas processing reporters.

Given the extensive nature of the proposed regulatory changes, GPA requests additional time to review the proposal and its supporting materials. We believe that this additional time will allow GPA to conduct a more thorough review of the technical and policy issues raised by EPA's proposal and to ensure that our comments will provide EPA with useful information.

If you have any questions or require additional information, please contact me at (202) 279-1664 or [mhite@gpamidstream.org](mailto:mhite@gpamidstream.org).

Sincerely,

A handwritten signature in black ink that reads "Matthew Hite". The signature is written in a cursive style with a large initial "M".

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Matthew Hite