



August 4, 2023

**Via Electronic Mail**

**Filed in EPA Docket ID No. EPA-HQ-OAR-2023-0234**

The Honorable Michael S. Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

**Re: Request for Extension of Comment Period**

Dear Administrator Regan:

On June 30, 2023, the U.S. Environmental Protection Agency ("EPA") released a pre-publication notice of proposed rulemaking entitled "Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems" ("Proposed Rule"). That document indicated that the Proposed Rule would be subject to a 60-day public comment period. In response, GPA Midstream ("GPA") submitted a July 13, 2023 request that EPA extend that public comment period by an additional 60 days. The Proposed Rule was published in the Federal Register on August 1, 2023, and it provides a 62-day comment period, with comments due on October 2, 2023. GPA continues to believe that an extension of the comment period is necessary.

GPA Midstream has served the U.S. energy industry since 1921 and has over 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 396,000 jobs across the U.S. economy. GPA Midstream members gather over 77% of the natural gas and recover more than 80% 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 2019-2021 period, GPA Midstream members spent over \$100 billion in capital improvements to serve the country's needs for reliable and affordable energy.

As stated in GPA's July 13, 2023 letter, additional time is necessary for the public to develop meaningful comments on the Proposed Rule. The Proposed Rule is extraordinarily

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complex and builds on years of rulemaking proceedings related to greenhouse gas reporting. GPA is still analyzing the Proposed Rule and assessing the extent to which it responds to GPA's comments on previous revisions to Subpart W reporting requirements. GPA also needs to time coordinate with its members and to develop consensus positions among a range of companies that may be differently positioned with respect to the Proposed Rule's provisions. For these reasons, GPA respectfully renews its request for an additional 60 days to review and prepare comments on the Proposed Rule. At the very least, GPA believes an additional 30 days, accounting for the time between the release of the pre-publication version of the proposal and its publication in the Federal Register, would be appropriate.

Thank you for your consideration of this request. Please contact me if you have additional questions or would like to further discuss the possibility of an extension of the public comment period or any other issue related to the Proposed Rule.

Respectfully submitted,



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Matt Hite  
Vice President of Government Affairs  
GPA Midstream Association

cc: Joseph Goffman, Principal Deputy Assistant Administrator  
Jennifer Bohman, Climate Change Division, Office of Atmospheric Programs