



January 26, 2024

Via Electronic Mail

Filed in EPA Docket ID No. EPA-HQ-OAR-2023-0434

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 January 26, 2024, the U.S. Environmental Protection Agency ("EPA") published a notice of proposed rulemaking, entitled "Waste Emissions Charge for Petroleum and Natural Gas Systems" ("Proposed Rule"). The Proposed Rule establishes a 45-day deadline for public comment. This letter is being sent on behalf of GPA Midstream Association to request that EPA extend this deadline by an additional 30 days, until April 10, 2024.

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.

The public needs additional time to develop meaningful comments on the Proposed Rule. As EPA explains in the preamble, the Proposed Rule is unusually complex. How the rule will operate will depend on numerous other EPA regulations, many of which are themselves subject to ongoing rulemaking proceedings. Analyzing how these rules will work together, evaluating the many possible regulatory outcomes, and then developing comments to submit to EPA will require more time than the 45-day comment period EPA has proposed.

The Proposed Rule also raises many substantive legal and technical issues that require thorough analysis. Affected members of the public are only just beginning to undertake that work. For that reason, GPA Midstream respectfully requests an additional 30 days to review and prepare comments on the Proposed Rule.

The ability to prepare comprehensive comments on these rules is of great importance to GPA Midstream. Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matt Hite", is positioned above a horizontal line.

Matt Hite
Senior Vice President of Government Affairs
GPA Midstream Association

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