

ORAL ARGUMENT NOT YET SCHEDULED

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

GPA MIDSTREAM ASSOCIATION,

Petitioner,

v.

U.S. ENVIRONMENTAL
PROTECTION AGENCY and
MICHAEL S. REGAN, Administrator,
U.S. EPA,

Respondents.

Case No.:

PETITION FOR REVIEW

Pursuant to Clean Air Act § 307(b)(1), 42 U.S.C. § 7607(b)(1), the Administrative Procedure Act, 5 U.S.C. § 702, Federal Rule of Appellate Procedure 15(a), and D.C. Circuit Rule 15, GPA Midstream Association hereby petitions this Court for review of Respondent United States Environmental Protection Agency’s (“EPA”) and Administrator Michael S. Regan’s final action, titled “Waste Emissions Charge for Petroleum and Natural Gas Systems: Procedures for Facilitating Compliance, Including Netting and Exemptions.” 89 Fed. Reg. 91,094 (Nov. 18, 2024) (Docket No. EPA-HQ-OAR-2023-0434;). A

copy of EPA's final rule is attached to this Petition. This Court has jurisdiction over this Petition under 42 U.S.C. § 7607(b)(1).

Dated: January 17, 2025

Respectfully submitted,

/s/ Aaron M. Flynn

Aaron M. Flynn

Allison D. Wood

Makram B. Jaber

McGuire Woods LLP

888 16th Street N.W.

Suite 500

Black Lives Matter Plaza

Washington, DC 20006

Counsel for GPA Midstream Association

ORAL ARGUMENT NOT YET SCHEDULED

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

GPA MIDSTREAM ASSOCIATION,

Petitioner,

v.

U.S. ENVIRONMENTAL
PROTECTION AGENCY and
MICHAEL S. REGAN, Administrator,
U.S. EPA,

Respondents.

Case No.:

RULE 26.1 CORPORATE DISCLOSURE STATEMENT

GPA Midstream has served the U.S. energy industry since 1921. GPA Midstream is composed of nearly 60 corporate members that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to as “midstream activities.” Such processing includes the removal of impurities from the raw gas stream produced at the wellhead as well as the extraction for sale of natural gas liquid products (“NGLs”) such as ethane, propane, butane, and natural gasoline or in the manufacture, transportation, or further processing of liquid products from natural gas. GPA Midstream

membership accounts for more than 90 percent of the NGLs produced in the United States from natural gas processing. GPA Midstream has no parent companies, and no publicly-held company has a 10 percent or greater ownership interest in GPA Midstream.

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing
Petition for Review to be served by U.S. Mail, postage prepaid, addressed to the
following:

Hon. Michael S. Regan
Office of the Administrator (1101A)
United States Environmental
Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Hon. Merrick Garland
Attorney General of the United States
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

Correspondence Control Unit
Office of General Counsel (2310A)
United States Environmental
Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Hon. Todd Kim
Assistant Attorney General
Environmental and Natural Resources
Division
U.S. Department of Justice 950
Pennsylvania Ave., N.W.
Washington, D.C. 20530

Dated January 17, 2025

/s/ Aaron M. Flynn
Aaron M. Flynn