



October 2, 2025

Amy Hambrick
Office of Air Quality Planning and Standards
Sector Policies and Programs Division (E143-05)
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, P.O. Box 12055
Research Triangle Park, North Carolina 27711

Submitted via regulations.gov

Re: Oil and Natural Gas Sector Climate Review: Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources, 90 Fed. Reg. 35966 (Jul. 31, 2025), Docket No. EPA-HQ-OAR-2025-0162-0001

Dear Ms. Hambrick:

GPA Midstream Association (“GPA Midstream” or “GPA”) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (“EPA”) on the Interim Final Rule (“IFR”) for Oil and Natural Gas Sector Climate Review: Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources, 90 Fed. Reg. 35966 (Jul. 31, 2025).

GPA has served the U.S. energy industry since 1921. GPA Midstream is composed of approximately 50 corporate members that directly employ over 57,000 employees that are engaged in the gathering, transportation, processing, treating, storage and marketing of natural gas, natural gas liquids (NGLs), crude oil, and refined products, commonly referred to in the industry as “midstream activities.” In 2023, GPA Midstream members operated 507,000 miles of pipelines, gathered 91 Bcf/d of natural gas, and operated more than 365 natural gas processing facilities.

GPA Midstream supports the effort of EPA to extend compliance deadlines in order to “address legitimate concerns, raised by stakeholders, that certain regulatory provisions [in the current regulations] are not currently workable or contain problematic regulatory language that frustrates compliance” as stated by the agency in the preamble of the IFR. GPA raised and provided detailed support for these concerns in our May 2024 Petition for Reconsideration and Request for Stay of Standards of Performance for New, Reconstructed, and Modified Sources and Emissions



Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review¹ (“GPA May 2024 Petition”) that we incorporate here by reference, as well as in our follow up meetings with the agency.

Among other concerns we have detailed that match the extensions issued by EPA in its IFR and provide additional record support for the IFR: (1) The minimum net heating value compliance demonstration requirements are not technically feasible, *see* GPA May 2024 Petition at 2-4, (2) the unlawful “no identifiable emissions” standard for covers and closed vent systems would result in widespread non-compliance, with what should be at most a work practice standard, *see* GPA May 2024 Petition at 14-15, (3) the unanticipated requirement to install low-e valves has created undue confusion over an unnecessary mandate to replace hundreds of thousands of valves that requires additional time to undertake given the scope of replacement anticipated, *see* GPA May 2024 Petition at 7-9, and (4) the unwarranted and unlawful change in EPA’s interpretation of a modification of a storage vessel will mean widespread non-compliance, *see* GPA May 2024 Petition at 15-16.

In sum, GPA Midstream supports the agency’s finding of good cause to issue the IFR. We thank EPA for investing the time and effort to meet with our members to understand our concerns, and we look forward to a continued dialogue with the agency on these matters. We stand ready to answer any follow-up questions the agency may have.

Sincerely,

A handwritten signature in black ink, appearing to read "AM", written over a light blue horizontal line.

Andrew Mooney
Director of Federal Affairs
GPA Midstream Association

¹ EPA-HQ-OAR-2024-0358-0013