

June 2, 2026

Submitted via www.regulations.gov

U.S. EPA
Attn: Matthew Witosky
Mail Drop: E143-05
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Docket ID No.: EPA-HQ-OAR-2025-1348

Re: National Emission Standards for Hazardous Air Pollutants: Crude Oil and Natural Gas Production Facilities and Natural Gas Transmission and Storage Facilities; Technology Review and Reconsideration (91 FR 21672, April 22, 2026)

Dear Mr. Witosky:

GPA Midstream Association (“GPA Midstream” or “the association”) respectfully requests that the Environmental Protection Agency (“EPA”) extend the public comment deadline for the above-referenced proposed rule by at least 45 days beyond the current June 22, 2026, deadline. The proposal includes multiple complex elements that require substantial technical, legal, and operational analysis by our member companies.

GPA Midstream has served the U.S. energy industry since 1921 and represents more than 50 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as “midstream activities.” The work of our members indirectly creates or impacts an additional 470,000 jobs across the U.S. economy. In 2024, GPA Midstream members had an economic impact of \$191 billion through operating 502,900 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 342 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.

GPA Midstream members especially need time to develop robust technical input regarding the addition of methanol as a regulated hazardous air pollutant and the implications for existing monitoring and reporting systems. This issue requires detailed engineering review, facility-level applicability assessments, and cross-sector coordination among operators, equipment manufacturers, and technical experts. A 45-day extension would ensure that

EPA receives complete, technically robust, and data-supported comments that will strengthen the administrative record.

GPA Midstream is committed to providing constructive, technically grounded feedback that supports EPA's statutory obligations under Clean Air Act section 112 while ensuring that any final requirements are feasible, risk-appropriate, and aligned with real-world midstream operations. A modest extension will materially improve the quality of the comments EPA receives and ultimately support a more durable and effective final rule.

Thank you for your consideration. We look forward to continued engagement with EPA on this critical rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stuart Saulters', with a stylized, cursive script.

Stuart Saulters
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