

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

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MICHIGAN OIL AND GAS	)		
ASSOCIATION and MILLER	)		
ENERGY COMPANY II, LLC,	)		
	)		
Petitioners,	)		
	)		
v.	)	Case No. 24-1101	
	)		
UNITED STATES ENVIRONMENTAL	)		
PROTECTION AGENCY and MICHAEL	)		
S. REGAN, Administrator, U.S. EPA,	)		
	)		
Respondents.	)		
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**PETITION FOR REVIEW**

Under Clean Air Act § 307(b)(1) (42 U.S.C. § 7607(b)(1)), 5 U.S.C. §§ 702 and 706, Federal Rule of Appellate Procedure 15(a), and D.C. Circuit Local Rule 15, the Michigan Oil and Gas Association and Miller Energy Company II, LLC petition this Court for review of the final agency action taken by Respondents United States Environmental Protection Agency and Michal S. Regan, Administrator, United States Environmental Protection Agency, entitled “Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review,” 89 Fed. Reg. 16820 (Mar. 8, 2024) (the “Final Rule”). Petitioners have attached a copy of the Final Rule to this petition. (Ex. A.)

Petitioners will show that the Final Rule exceeds the agency's statutory authority and otherwise is arbitrary, capricious, an abuse of discretion, and not in accordance with law. Petitioners thus ask that this Court declare unlawful and vacate the Final Rule.

Respectfully submitted,

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Gas Association and Miller Energy  
Company II, LLC*

Dated: April 29, 2024



United States or abroad, and no publicly held company owns more than ten (10) percent ownership in MOGA.

MEC owns and operates oil and gas wells in the State of Michigan. MEC is a wholly owned subsidiary of Miller Energy Partners LLC. No publicly held company owns more than ten (10) percent ownership in MEC or Miller Energy Partners LLC.

Respectfully submitted,

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Dated: April 29, 2024

## CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2024, I have caused a true and correct copy of the foregoing **Petition for Review** and **Rule 26.1 Disclosure Statement** to be served by U.S. Mail, postage prepaid, addressed to the following:

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