

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

TEXAS OIL AND GAS ASSOCIATION,

Petitioner,

v.

U.S. ENVIRONMENTAL PROTECTION AGENCY and MICHAEL S. REGAN, Administrator, U.S. Environmental Protection Agency,

Respondents.

No. 24-1114

PETITION FOR REVIEW

Pursuant to Rule 15 of the Federal Rules of Appellate Procedure and section 307(b) of the Clean Air Act, 42 U.S.C. § 7607(b), the Texas Oil and Gas Association hereby petitions the Court for review of the nationally applicable final action of the U.S. 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; Final Rule, 89 Fed. Reg. 16,820 (March 8, 2024), codified at 40 C.F.R Part 60.

A copy of the final rule is attached to this petition.

Respectfully submitted,

/s/ Shannon S. Broome

Shannon S. Broome

HUNTON ANDREWS KURTH LLP

50 California Street, Suite 1700

San Francisco, CA 94111

(415) 975-3718

sbroome@huntonak.com

Charles H. Knauss

HUNTON ANDREWS KURTH LLP

2200 Pennsylvania Avenue NW

Washington, D.C. 20037

(202) 419-2003

cknauss@huntonak.com

*Counsel for the Texas Oil and Gas
Association*

Dated: May 7, 2024

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

TEXAS OIL AND GAS ASSOCIATION,

Petitioner,

v.

U.S. ENVIRONMENTAL PROTECTION AGENCY and MICHAEL S. REGAN, Administrator, U.S. Environmental Protection Agency,

Respondents.

No. 24-1114

RULE 26.1 STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, Petitioner Texas Oil and Gas Association (TXOGA) makes the following Disclosure:

TXOGA, a “trade association” within the meaning of Circuit Rule 26.1, is a statewide organization representing every facet of the Texas oil and gas industry including small independents and major producers. Collectively, the membership of TXOGA produces approximately 90 percent of Texas’ crude oil and natural gas and operates the vast majority of the state’s refineries and pipelines and, therefore, own and operate facilities that are affected by the rule at issue in this case.

TXOGA has not issued shares or debt securities to the public, has no parent company, and no publicly-held company has a 10 percent or greater ownership interest in TXOGA.

Respectfully submitted,

/s/ Shannon S. Broome

Shannon S. Broome

HUNTON ANDREWS KURTH LLP

50 California Street, Suite 1700

San Francisco, CA 94111

(415) 975-3718

sbroome@huntonak.com

Charles H. Knauss

HUNTON ANDREWS KURTH LLP

2200 Pennsylvania Avenue NW

Washington, D.C. 20037

(202) 419-2003

cknauss@huntonak.com

*Counsel for the Texas Oil and Gas
Association*

Dated: May 7, 2024

CERTIFICATE OF SERVICE

Pursuant to Rule 25(d) of the Federal Rules of Appellate Procedure, I hereby certify that the foregoing Petition for Review and Rule 26.1 Statement have been served by certified United States mail, return receipt requested, this 7th day of May 2024, upon each of the following:

The Honorable Michael S. Regan
Administrator
Office of the Administrator (1309)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Correspondence Control Unit
Office of General Counsel (2311)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

The Honorable Merrick Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

The Honorable Todd S. Kim
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

/s/ Shannon S. Broome
Shannon S. Broome