



THE ADMINISTRATOR
WASHINGTON, D.C. 20460

December 26, 2024

Mr. James D. Elliot
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, Pennsylvania 17050

Dear Mr. Elliot:

This letter concerns the administrative petition of the Final Rule “Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems,” 89 Fed. Reg. 42,062 (May 14, 2024), that you submitted October 25, 2024, on behalf of the Producer Associations.

The U.S. Environmental Protection Agency released that final rule May 6, 2024, to strengthen, expand and update methane emissions reporting requirements for petroleum and natural gas systems under subpart W of the EPA's Greenhouse Gas Reporting Program to ensure that reporting is based on empirical data, accurately reflects total methane emissions and waste emissions from applicable facilities, and allows owners and operators of applicable facilities to submit empirical emissions data that appropriately demonstrate the extent to which a charge is owed under the Waste Emissions Charge.

After careful consideration the EPA is partially denying the petition regarding one objection for the reasons explained in the enclosure, “The EPA’s Basis for Partially Denying Administrative Petitions of Specific Provisions of the Subpart W 2024 Final Rule.” The EPA is not acting on the remainder of the administrative petition of the subpart W final rule at this time.

If you have any questions regarding this letter, my colleague Stephanie Bogle would be pleased to assist you and is available at (202) 343-9179 and Bogle.Stephanie@epa.gov.

Sincerely yours,

A handwritten signature in black ink that reads "Michael S. Regan".

Michael S. Regan