

September 28, 2023

Submitted via Federal eRulemaking Portal: <http://www.regulations.gov>

Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Request for Extension of Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems, Docket Id. No. EPA-HQ-OAR-2023-0234

Dear Administrator Regan,

The Energy Workforce & Technology Council respectfully requests that the U.S. Environmental Protection Agency (EPA) extend the public comment deadline for the proposed amendments to the Greenhouse Gas Reporting Rule, Docket Id. No. EPA-HQ-OAR-2023-0234.

The Energy Workforce & Technology Council is the national trade association for the energy services and technology sector representing over 350 member companies and 650,000 workers in the United States. Like the rest of the energy sector, the companies that comprise our membership are diverse in size, scope, and governance models. Our members represent the spectrum from private sole proprietorships to publicly held companies with thousands of employees.

Improving accuracy and reliability in greenhouse gas emission inventory from the oil and gas sector is important to our industry. We support the EPA's aim to offer scientifically sound GHG data and reduce emissions in this industry. Enhancing Subpart W is an opportunity to update methods and reflect current U.S. oil and gas emissions accurately if done with input from the private sector and in a realistic and achievable manner.

EPA's proposed changes are extensive, spanning over 600 pages of technical documents and impact analyses, with 175 additional documents in the docket. These changes intersect with other rulemakings, potentially causing unintended industry and economic impacts. Understanding how these rules align and identifying inconsistencies and conflicts is complex and time-consuming and we have heard directly from our membership that these rule intersections are making accurate reporting more difficult.

To ensure thoughtful public input and prevent hasty policy finalization, we request a 60-day extension of the comment period. This extension will allow stakeholders to perform comprehensive analyses and provide meaningful feedback, ultimately enhancing the rule finalization process.

Thank you for your consideration of this request, and Energy Workforce looks forward to engaging with EPA as this proposed rule is reviewed.

Sincerely,



Tim Tarpley
President
Energy Workforce & Technology Council