

Submitted via www.regulations.gov

October 1, 2025

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Interim Final Rule for Oil and Natural Gas, identified by
Docket ID No. EPA-HQ- OAR-2025-0162

The Western Energy Alliance (The Alliance) is a leader and champion for independent oil and natural gas companies in the western United States. Working with a vibrant membership base for over 50 years, the Alliance stands as a credible leader, advocate, and champion of the industry. Alliance members engage in all aspects of environmentally responsible exploration and development of oil and natural gas. Our expert staff, active committees, and committed board members form a collaborative and welcoming community that is dedicated to abundant, affordable energy and a high quality of life for all. The following comments are in addition to the oral remarks made on behalf of the Alliance at the EPA virtual hearing held on September 2, 2025, in support of extending the deadlines for OOOOc and OOOOb.

The Alliance supports the EPA's interim final rule extending the deadline for states to submit their implementation plans under Subpart OOOOc—from March 9, 2026, to January 22, 2027. This extension is both reasonable and necessary and is grounded in sound policy and practical realities that cannot be ignored.



First and foremost, the EPA itself has acknowledged that the vast majority of states will not be able to meet the current March 2026 deadline. Nearly 21 states will be required to submit complex plans. Imposing an unworkable timeline threatens to undermine the development of well-constructed, enforceable plans. A rushed approach leads to poor compliance, inefficiencies, and undermines the climate objectives the rule is designed to achieve.

Second, the scope and complexity of Subpart OOOOc cannot be overstated. The rule is lengthy, highly prescriptive, and applies to an industry that is equally vast and technically diverse. States and tribes need sufficient time to identify and classify affected sources, assess current regulations, conduct robust public outreach, evaluate compliance options, and ultimately craft practical, enforceable plans. That process is neither quick nor simple.

Third, many western states—such as **Colorado and New Mexico**—have already implemented stringent emissions standards that go beyond federal baselines. These programs are already delivering measurable environmental benefits. Yet under the current structure of OOOOc, states are not permitted to demonstrate that their existing regulations are equivalent in effect. Forcing them to replace effective state programs with federal prescriptive language would be counterproductive and unnecessarily burdensome. The extension provides time for the EPA to consider regulatory flexibility and equivalent frameworks that recognize and reward existing leadership.

Fourth, state agencies are operating under significant budgetary and staffing constraints. Developing an OOOOc plan is a resource-intensive process that includes technical, legal, and economic analysis. Without an adequate timeline, states simply will not have the capacity to deliver plans that meet legal and environmental



expectations. This modest extension is essential for ensuring states can fulfill their responsibilities under the Clean Air Act.

The rule includes the possibility of less stringent requirements for facilities with limited remaining useful life. But identifying and justifying such exemptions requires in-depth, facility-specific analysis. This is a challenging and time-consuming process, particularly for smaller operators—many of whom we represent in the West. A longer planning window will give states the opportunity to conduct this work responsibly.

Finally, in addition to the OOOOc extension, the Alliance supports the extended compliance deadlines for OOOOb sources. Given the technical complexity, capital investment, and logistical challenges involved in implementing the new OOOOb requirements—such as installing continuous flare monitoring systems, performing NHV sampling, and retrofitting or replacing gas pneumatic controllers, additional time is essential to ensure accurate, safe, and cost-effective compliance.

Small and mid-sized operators, in particular, may struggle to meet the current deadlines due to supply chain constraints, limited vendor availability for specialized equipment, and the need for workforce training. All of which further justifies the need for extended compliance timelines based on the December 6, 2022, applicability date. The original 60-day effective date was unachievable given these technical feasibility challenges.

In closing, the Western Energy Alliance supports the deadline extension to January 2027 as a practical and prudent decision. It respects the complexity of the rule, the realities of state implementation, and the existing work many states have already undertaken to reduce emissions. Most importantly, it allows time for thoughtful collaboration between EPA, states, tribes, and

industry stakeholders to ensure effective, durable implementation of OOOOc.

Thank you for your time and consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', followed by a long horizontal flourish.

Melissa Simpson
President