

August 4, 2026

Administrator Lee Zeldin
Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460
Submitted via www.regulations.gov

RE: National Emission Standards for Hazardous Air Pollutants: Crude Oil and Natural Gas Production Facilities and Natural Gas Transmission and Storage Facilities; Technology Review and Reconsideration, Docket ID No. EPA-HQ-OAR-2025-1348

Dear Administrator Zeldin:

Western Energy Alliance (the Alliance) is the 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 industry. Alliance members engage in all aspects of environmentally responsible exploration and development of oil and natural gas. Our expert staff, active member committees, and committed board members form a collaborative and welcoming community of professionals dedicated to abundant, affordable energy and a high quality of life for all.

The Alliance appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) review of the National Emission Standards for Hazardous Air Pollutants from Crude Oil and Natural Gas Production Facilities and from Natural Gas Transmission and Storage Facilities (Oil and Gas NESHAP) in connection with a technology review pursuant to Clean Air Act (CAA) section 112.

We support EPA's statement in the proposed rule that "no revisions to the current standards in NESHAP subparts HH and HHH are necessary pursuant to the CAA section 112(d)(6) technology review."

We also support the statement that EPA is "not obligated to promulgate standards for additional emission points at this time as part of the CAA section 112(d)(6) technology review." EPA should not proceed with the alternative approach discussed in the proposal that would impose new control standards for previously unregulated emissions points.

Finally, the Alliance supports the proposed new standards for methanol for regulated emission points with no additional control requirements.

As noted in the "Impacts of Proposal" section of the draft rule, EPA's proposed actions

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properly align with its statutory authority under the Clean Air Act. The alternative approach, while only anticipated to impose minimal costs on the oil and gas industry, would not result in emissions reductions and is therefore unnecessary and overly burdensome. The current standards, as updated and maintained under the proposed rule, are sufficient to comply with the Clean Air Act, and no further action is needed from EPA.

EPA should move forward with finalizing the proposed rule. Thank you for your time and consideration of these comments. Please do not hesitate to contact me if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal flourish extending to the right.

Melissa Simpson
President, Western Energy Alliance