



May 26, 2026

Amanda Brimmer
Air and Radiation Division
EPA, Region 8
Mailcode 8ARD-AQ-R
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Submitted via www.regulations.gov

RE: Docket ID No. EPA-R08-OAR-2024-0001
Utah; Uinta Basin; 2015 8-Hour Ozone National Ambient Air Quality
Standard; Reconsideration and Repeal of Finding of Failure To Attain
and Reclassification to a Moderate Nonattainment Area; Extension of
the Attainment Date and Determination of Attainment by the Marginal
Attainment Date

Ms. Brimmer:

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) proposed repeal of the December 16, 2024 final rule in which EPA denied a request for an extension of the attainment date for the Uinta Basin (UB), Utah Marginal nonattainment area (NAA) under the 2015 ozone National Ambient Air Quality Standard (NAAQS), and the proposed determination that the area attained the 2015 ozone NAAQS based on certified ozone monitoring data from 2020-2022. Alliance member companies operate in the UB and are impacted by EPA's designation of the NAA.

The Alliance strongly supports EPA's statement in the draft rule that the 2024 denial of the extension request and proposed Determination of Attainment by the Attainment Date (DAAD) was inappropriate because "Utah sufficiently met the statutory criteria for a second 1-year attainment date extension," and the denial "imposed additional obstacles that Congress did not specifically require." Based on available air quality data provided by the State of Utah in its request for an extension of the attainment date for the UB, EPA should have granted the extension request and approved the DAAD.

UB Extension of Attainment Date and Determination of Attainment by the Attainment Date

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Western Energy Alliance hereby incorporates by reference the comment letter submitted separately by the Utah Petroleum Association (UPA). The comments from UPA highlight how EPA's proposed rule is appropriate and necessary because the UB meets all statutory and regulatory criteria under the Clean Air Act, and because the 2024 denial of the extension request violated EPA's statutory requirements.

Air quality in the Uinta Basin has substantially improved, while emissions from oil and gas production in the UB have declined, even as oil and gas production has increased in recent years. The decline in oil and gas emissions is a result of permanent and enforceable emissions reduction controls such as Utah's 500-series rules for operations and facility management, EPA's federal implementation plan, and its regulation of new, modified, and existing sources. Meanwhile, the decline in oil and gas emissions has directly contributed to the air quality improvements in the Basin, as outlined in UPA's comment letter.

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,



Melissa Simpson
President, Western Energy Alliance