



October 16, 2015

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
Washington, DC 20460

The Honorable Neil Kornze  
Director  
Bureau of Land Management  
1849 C Street NW, Room 5665  
Washington, D.C. 20240

Re: Request for an Extension of the Public Comment Periods for Proposed Rules Relating to the Oil and Natural Gas Sector:

- Emission Standards for New and Modified Sources, Docket ID No. EPA-HQ-OAR-2010-0505 (NSPS OOOOa)
- Draft Control Technique Guidelines for the Oil and Natural Gas Industry, Docket ID No. EPA-HQ-OAR-2015-0216 (CTGs)
- Source Determination for Certain Emission Units in the Oil and Natural Gas Sector, Docket ID No. EPA-HQ-OAR-2013-0685
- Review of New Sources and Modifications in Indian Country, Docket ID No. EPA-HQ-OAR-2014-0606 (Tribal NSR)
- Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Site Security, Docket ID No. BLM-2015-0003 (Onshore Order No. 3)
- Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Measurement of Oil, Docket ID No. BLM-2015-0004 (Onshore Order No. 4)
- Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; Measurement of Gas, Docket ID No. BLM-2015-25556 (Onshore Order No. 5)
- BLM's Forthcoming Update to the Venting and Flaring Rules (Onshore Order No. 9)

Dear Administrator McCarthy and Director Kornze:

Currently, between EPA and BLM, there are at least eight regulatory efforts related either directly or in a connected nature to measuring and reducing methane emissions from the oil and natural gas industry. The regulations proposed by EPA and BLM are complex, highly technical, and closely interrelated, and we must be able to contemplate the full scope of these proposed rules in order to effectively analyze them and provide both agencies with substantive and considered comments. Therefore, we are requesting an extension to each comment period for the proposed rules listed above so that they collectively close ninety days after the release of BLM's forthcoming Venting and Flaring rule (Onshore Order No. 9,) the last one anticipated for release. Overlapping comment periods and in the case of Onshore Order Number 3 a reopening of the comment period, are necessary to ensure that we and the agencies can analyze the interrelated nature of these regulations and

ensure a deliberative rulemaking process that contemplates the full economic impact collectively of these rules and their impact on American energy production.

Western Energy Alliance represents over 450 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents, the majority of which are small businesses with an average of fifteen employees.

Taken together, these proposals from EPA and BLM have potentially far-reaching impacts for the oil and natural gas industry that warrant thoughtful evaluation. EPA and BLM have placed the burden on the oil and natural gas industry to comprehend these numerous, complex regulations and provide the detailed technical data necessary to justify them in a time period that does not allow our industry to fully understand the extent of the proposed regulatory actions. Normally that evidentiary burden is placed on the regulating agency, not on the regulated entity. Because of the length and complexity of the rules and the burden for evidence, we believe a ninety day overlap with BLM's Venting and Flaring rules is a reasonable request.

EPA, in its proposed rules, references extensive coordination with BLM on its Venting and Flaring rule and publicly has presented its rulemaking actions as a package to address oil and natural gas industry emissions. Given this coordinated approach by EPA and BLM, it is only prudent that industry be allowed to evaluate the full package in order to provide meaningful input.

Given the complexity and concurrent requirements on the oil and natural gas sector, we believe EPA and BLM should extend the comment periods as well as the deadlines for taking final agency action. Thank you for your consideration of this request.

Sincerely,



Kathleen M. Sgamma  
VP of Government & Public Affairs

cc: Office of Management and Budget, Office of Information and  
Regulatory Affairs