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U.S. Environmental Protection Agency

1200 Pennsylvania Avenue NW

Washington, DC 20460

Re: Comments on EPA's Reconsideration of the Greenhouse Gas Reporting Program (GHGRP) Docket No. EPA-HQ-OAR-2025-0186 RIN 2060-AW76

To: Administrator Zeldin

Introduction

The Western Energy Alliance (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 a high quality of life, and abundant, affordable energy.

The Alliance appreciates the opportunity to submit comments on EPA's proposed **Reconsideration of the Greenhouse Gas Reporting Program (GHGRP).**

1. Introduction to the Alliance's Position

a. Support for Balanced Environmental Policy

Thoughtful and achievable environmental policy is essential to the long-term success of the U.S. as an energy-producing nation and to maintaining trust among consumers and international partners.

b. Regulatory Overreach Under Prior Administration

The Alliance is concerned that the prior administration's greenhouse gas (GHG) regulatory efforts went beyond what is lawful, reasonable, or achievable. The GHG regulations issued over the last four years—covering power plants, passenger vehicles, and commercial trucking—are excessively burdensome. These rules impose enormous costs on industry, consumers, and the broader economy, with limited environmental benefit.

c. The Need to Right-Size Federal Regulation

Right-sizing the federal regulatory framework is critical to restoring a business environment that supports investment, innovation, and domestic energy development. These efforts align with the current Administration's goals of "unleashing American energy" and achieving "energy dominance."

Overly burdensome regulations can hamper economic growth and reduce U.S. competitiveness. In just four years, the previous administration adopted rules projected to cost the economy more than $1.8 trillion, with $1.3 trillion of those costs attributed to EPA regulations alone.

Reducing the regulatory burden is a high priority and the Alliance supports efforts by this Administration to enhance American competitiveness through regulatory reform.

d. The Value of a Well-Crafted GHGRP

Despite concerns about regulatory overreach, the Alliance believes a well-crafted national GHG emissions reporting program, such as the GHGRP, serves a valuable role. When implemented properly, the GHGRP supports legitimate business needs, provides valuable data for market access, and enhances U.S. competitiveness.

2. The Benefits of the GHGRP Outweigh Its Costs

a. Value of EPA GHG Data

EPA's validation of emissions data under the GHGRP serves a wide array of important business, trade, and technological functions. In many cases, it helps reduce the overall regulatory burden by providing a centralized, credible data source. The GHGRP supports the following critical uses:

i. Enabling Global Market Access

The GHGRP provides validated, credible data that is essential for the U.S. oil and natural gas industry to compete globally. International markets increasingly demand transparency regarding the carbon intensity of products, and the GHGRP helps U.S. companies meet these expectations.

ii. Facilitating Trade Compliance for LNG Exporters

For U.S. liquefied natural gas exporters, GHGRP data supports compliance with incoming EU Carbon Border Adjustment Mechanism (CBAM) verifier requirements, beginning in 2026. It also helps with similar foreign frameworks. Without GHGRP data, exporters could face duplicative, costly, and inconsistent international reporting obligations.

iii. Strengthening Supply Chain Credibility

The GHGRP offers decision-grade, EPA validated data at the facility, helping companies demonstrate reliability and comparability across their supply chains.

iv. Supporting Federal Tax Incentive Programs

GHGRP data is a critical input for emerging clean energy sectors and available tax incentives. It helps enable participation in 45Q (carbon capture and sequestration) and 45V (clean hydrogen) tax credit programs by providing the emissions data required to qualify. Eliminating Subpart RR and delaying Subpart W provisions supporting Section 45 tax credits would create uncertainty for producers. These measures are vital for advancing carbon capture, storage, and low-carbon hydrogen technologies. Their removal/delay adds complexity to essential programs needed to achieve U.S. energy objectives, including product offtake agreements with EU / Asia-Pacific customers; therefore, they are vital for enhanced oil recovery and to strengthen U.S. energy independence.

v. Promoting Regulatory Stability

A consistent, national-level reporting program like the GHGRP prevents regulatory whiplash and avoids the inefficiencies associated with frequent changes to reporting expectations. This stability allows businesses to plan and invest with confidence.

b. Preventing a Patchwork of State Regulations

Without a reliable national program like the GHGRP, states may pursue individual GHG reporting mandates, resulting in a fragmented and burdensome regulatory environment. Indeed, some states such as California, Oregon, and Washington have already implemented their own GHG reporting programs, New York is poised to implement its own requirements, and withdrawal of the GHGRP is likely to result in additional states implementing their own programs, such as New Jersey. This patchwork of individual state-level programs would increase compliance costs, reduce data quality, and create inconsistencies across jurisdictions. In addition, some state-led programs may not align with international standards, making it harder for U.S. producers to compete globally and directly undermining American energy leadership.

3. EPA Should Amend – Not Abandon – the GHGRP

a. Roll Back Biden-Era Expansions

Rather than eliminating the GHGRP, the Alliance encourages EPA to roll back recent expansions to the GHGRP made under the prior administration, such as requiring inspections and monitoring. Some specific examples of overreach that could be rescinded include, but are not limited to:

- Annual Audio Visual and Olfactory (AVOs) to look for open thief hatches under 40 CFR 98.233(j)(4) and (7).
- Monthly flare pilot monitoring under 40 CFR 98.233(N)
- Flare destruction efficiency monitoring requirements under 40 CFR 98.233 (N)
- Annual Gas-Liquid Separator dump valve inspections under 40 CFR 98.233(j)(6)

Doing so would offer meaningful regulatory relief while preserving EPA's vital data standardization and validation functions. The core purpose of the GHGRP—providing accurate and comparable emissions data—can be maintained without unnecessary complexity or cost.

b. Narrow Applicability and Reduce Burden on Small Entities

EPA should explore narrowing the scope of GHGRP requirements to reduce burdens on small and low-emitting businesses. A threshold-based or tiered system would allow EPA to focus on higher-emitting sectors while providing regulatory relief to smaller entities with minimal emissions. This targeted approach would enhance the program's cost-effectiveness and practicality.

c. Limit Reporting to Direct Emissions

EPA should also explore eliminating reporting of emissions under Subparts MM and/ NN. These Subparts are misaligned with the remainder of the GHGRP which cover facility-level direct GHG emissions. Removing these Subparts would reduce burden on reporters which require separate systems to enable this reporting and encourage a focus on direct emissions within a reporting entity's control.

4. Conclusion

The Alliance urges EPA to maintain a streamlined and focused GHGRP that provides validated emissions data without placing excessive burdens on the energy sector and broader economy. The GHGRP plays a meaningful role in supporting global competitiveness, trade compliance, and energy innovation. Rather than eliminating the program, EPA should pursue strategic reforms that preserve its core functions while improving efficiency, cost-effectiveness, and utility. The Alliance stands ready to work with EPA to streamline the GHGRP and ensure it supports a more competitive, innovative, and energy-secure future for the United States.

Sincerely,

Melissa Simpson
President
Western Energy Alliance