



February 22, 2024

Transmitted via email and regulations.gov

Mr. Shaun Ragnauth
Climate Change Division
Office of Atmospheric Programs (MC-6207A)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
merp@epa.gov

RE: Request for Extension of Comment Deadline: Waste Emissions Charge for Petroleum and Natural Gas Systems Proposed Rule. Docket No. EPA-HQ-OAR-2023-0434:

Dear Mr. Ragnauth:

The Offshore Operators Committee (OOC) and National Ocean Industries Association (NOIA) and respectfully ask the Environmental Protection Agency (EPA) to extend the comment deadline on the Proposed Rule for Waste Emissions Charge (WEC) for Petroleum and Natural Gas Systems (Docket # EPA-HQ-OAR-2023-0434) until 30 days after the final publications of the Greenhouse Gas Reporting Rule Subpart W (Docket # EPA-HQ-OAR-2023-0234).

The OOC represents numerous oil & gas, wind energy and carbon capture and storage (CCS) companies on the Outer Continental Shelf (OCS), and the proposed rule has the potential to impact existing and future operations of our member companies. For the past 75 years, these members companies have been excellent stewards of the environment and worker safety on the OCS.

NOIA represents the interests of all segments of the offshore energy industry, including offshore oil and gas, offshore wind, offshore minerals, offshore carbon capture, use and sequestration (CCUS), and other emerging technologies. Our membership includes energy project leaseholders and developers and the entire supply chain of companies that make up an innovative ecosystem contributing to the safe and responsible development and production of offshore energy.

The proposed Waste Emissions Charge (WEC) rule, 40 CFR Part 99, establishes charges for waste emissions applicable to facilities using the annual emissions reported under 40 CFR Part 98, Subpart W (Subpart W). Last year, the EPA proposed revisions to Subpart W, and the public, including OOC, submitted numerous comments on the proposed revisions. Many of the suggested changes could greatly affect emissions reported under the revised rule if implemented as proposed. Therefore, to ensure meaningful and well-informed comments on the proposed WEC rule, it is essential for commenters to first review the final revised Subpart W. An extension of the public comment period is necessary because there are various

issues in the proposed Subpart W rule for which OOC has requested clarification and revisions. OOC's comment letter on Subpart W is provided for reference. The final Subpart W could significantly influence the public's comments on this proposed WEC rule.

In summary, OOC and NOIA urge the Environmental Protection Agency (EPA) to extend the comment deadline for the proposed WEC rule by 30 days following the final publication Subpart W. This extension is crucial to ensure informed feedback on the proposed WEC rule, given the potential significant impact of revisions to Subpart W on emissions reporting. OOC and its member companies, representing approximately 90% of oil and gas production in the Gulf of Mexico OCS, emphasize their commitment to environmental protection and request adequate time for thorough review to support EPA's goal of reducing methane emissions during offshore oil & gas operations.

We appreciate your consideration of our request. If you have any questions or if additional information is needed, please contact me at steve@theooc.org.

Sincerely,



Steve Hamm
Associate Director
Offshore Operators Committee



Erik Milito
President
National Ocean Industries Association

Attachment: OOC Comments on the Proposed Subpart W Revisions