

Congress of the United States
Washington, DC 20515

November 24, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Administrator McCarthy and Secretary Jewell:

On September 18, 2015, the Environmental Protection Agency (EPA) proposed a suite of rules and guidelines that are intended to result in additional reductions in volatile organic compounds and methane emissions from the oil and gas industry.¹ We understand that in addition to these proposed rules and guidelines, the Bureau of Land Management (BLM) intends to propose new methane regulations for the oil and gas sector on federal lands.

To respond to the hundreds of pages of EPA proposed rules, guidelines, and related agency analyses and technical documents, the agency provided the public initially with a 60-day comment period. We understand that in response to requests for a 60-day extension of this period, the agency has granted only a very limited extension from November 17, 2015 to December 4, 2015.

This extension, which includes the Thanksgiving holiday, is inadequate for sufficient public review and comment, given the length and complexity of the proposed EPA regulations, guidelines and related documentation, and other ongoing related regulatory actions. We believe additional time is necessary to provide the public sufficient time to review and comment on the Administration's interrelated proposals. We note specifically that the methane regulations expected to be proposed by the BLM have the potential to propose requirements that are

¹ The three rules are titled, "Source Determination for Certain Emission Units in the Oil and Natural Gas Sector," "Oil and Natural Gas Sector: Emission Standards for New and Modified Sources," and "Review of New Sources and Modifications in Indian Country: Federal Implementation Plan for Managing Air Emissions from True Minor Sources Engaged in Oil and Natural Gas Production in Indian Country." The EPA also announced the availability of a draft Control Techniques Guidelines (CTG) document titled, "Release of Draft Control Techniques Guidelines for the Oil and Natural Gas Industry," in a notice published on September 18, 2015. In October and November 2015, EPA also issued for public comment various draft documents relating to its voluntary Natural Gas STAR Methane Challenge program.

conflicting or duplicative, and to create significant uncertainty for future operations in the oil and gas sector.

For the foregoing reasons, EPA should provide a full 60-day extension, to January 17, 2016, for comment on the suite of proposed rules and guidelines announced on September 18, 2015. To the extent the BLM moves forward with proposed methane rules, the comment period for these EPA proposed rules and guidelines should also be further extended or reopened to allow the public with at least 30 days to review the EPA and BLM regulations concurrently.

Thank you for your consideration of this request.

Sincerely,



Ed Whitfield
Chairman
Subcommittee on Energy and Power
Committee on Energy and Commerce



Doug Lamborn
Chairman
Subcommittee on Energy and Mineral Resources
Committee on Natural Resources

cc: The Honorable Howard Shelanski
Administrator, Office of Information and Regulatory Affairs

The Honorable Neil Kornze
Director, Bureau of Land Management

The Honorable Bobby Rush, Ranking Member
Subcommittee on Energy and Power

The Honorable Alan Lowenthal, Ranking Member
Subcommittee on Energy and Mineral Resources