



July 28, 2025

Honorable Aaron Szabo  
Assistant Administrator, Office of Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

### **Request for Extension of Reporting Deadline**

Assistant Administrator Szabo:

The purpose of this letter is to request an extension of the deadline for filing annual reports under the New Source Performance Standard for the Oil and Natural Gas Sector, 40 C.F.R. Part 60 Subpart OOOOb. The deadline for affected facilities that became subject to the rule upon its effective date is August 5, 2025. We respectfully request an extension of that deadline for affected facilities owned or operated by members of the Interstate Natural Gas Association of America ("INGAA") and members of the GPA Midstream Association ("GPA Midstream") until 90-days after finalization of the administrative reconsideration announced in March 2025.

INGAA represents the interstate natural gas industry with member companies transporting more than 95 percent of the nation's natural gas through approximately 200,000 miles of interstate natural gas pipelines. In 46 of the 48 contiguous United States, INGAA member companies operate over 5,400 natural gas compressors at over 1,300 compressor stations and storage facilities along the pipelines to transport natural gas to local distribution companies, industrials, gas marketers, and gas-fired electric generators. This includes over 3,500 stationary natural gas-fired reciprocating engines, 1,500 combustion turbines, and 300 electric motors that drive compressors.

GPA Midstream has served the U.S. energy industry since 1921 and has over 50 domestic corporate members that directly employ 55,000 employees in a wide variety of services that move vital energy products such as natural gas, natural gas liquids, crude oil and refined products, commonly referred to as "midstream activities." The work of our members indirectly creates or impacts an additional 400,000 jobs across the U.S. economy. In 2022, GPA Midstream members operated over 250,000 miles of gas pipelines, gathered over 85 billion cubic feet per day of natural gas, and operated over 375 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.

Over the past several years, INGAA and GPA Midstream have worked extensively with the U.S. Environmental Protection Agency ("EPA") on the "Quad O" series of emissions standards for the oil and gas production sector. Numerous INGAA and GPA Midstream members are subject to

those rules, including the latest iteration – Subpart OOOOb – which was promulgated last year.<sup>1</sup> We are making this request on behalf of our members to avoid the need for the Agency to process the many individual company requests that otherwise would be submitted. We believe this approach will streamline and facilitate your consideration of this important issue.

## **I. Background**

Subpart OOOOb was published in the Federal Register on March 8, 2024. The effective date of the rule was May 7, 2024.<sup>2</sup> Subpart OOOOb significantly expanded the scope and stringency of the prior Subpart OOOOa rule, including requirements applicable to “fugitive emissions from well sites; monitoring of control devices; super-emitters; storage vessels; associated gas; pumps; equipment leaks at gas plants; appendix K; centrifugal compressors; and reciprocating compressors.”<sup>3</sup>

The rule requires affected facilities to submit annual reports to EPA and specifies that the “initial annual report is due no later than 90 days after the end of the initial compliance period.”<sup>4</sup> For facilities that became subject to Subpart OOOOb upon its effective date, the initial annual report is due August 5, 2025. Annual reports must include a substantial amount of information. Indeed, it takes 14 paragraphs and 164 subparagraphs of rule text to describe everything that must be included in an annual report. Given that a typical affected facility includes several (if not dozens) of individually regulated emissions sources or activities, preparing an annual report for a single affected facility is time consuming and tremendously costly. That effort balloons many times over for companies that own or operate multiple affected facilities. Thus, the reporting burden alone justifies an extension of the deadline for submitting annual reports.

But perhaps more importantly, key substantive obligations and compliance deadlines that give rise to the annual reporting requirement likely will be changing in the near future. For example, an interim final rule currently under interagency review at the Office of Management and Budget is expected to delay the compliance deadlines for several core Subpart OOOOb standards. In addition, EPA has proposed and is expected to soon finalize a reconsideration rule that likely will change the scope and substance of Subpart OOOOb provisions applicable to flaring of associated gas and monitoring of net heating value.<sup>5</sup> And, EPA announced in March 2025 its intent to reconsider Subpart OOOOb as a whole.<sup>6</sup> It would be sensible to defer the deadline for submitting annual reports while the scope and applicability of the rule is being resolved.

## **II. Authority to Revise the Annual Reporting Deadline**

EPA has clear authority to revise the annual reporting deadline. The NSPS General Provisions at § 60.19(c) provide that “[n]otwithstanding time periods ... specified in this part for the submittal

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<sup>1</sup> 89 Fed. Reg. 16820 (Mar. 8, 2024).

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 16828.

<sup>4</sup> 40 C.F.R. § 60.5420b(b).

<sup>5</sup> 90 Fed. Reg. 3734 (Jan. 15, 2025).

<sup>6</sup> See [Trump EPA Announces OOOO b/c Reconsideration of Biden-Harris Rules Strangling American Energy Producers](#).

of information to the Administrator by an owner or operator ... such time periods ... may be changed by mutual agreement between the owner or operator and the Administrator.” The rules further specify that an “owner or operator who wishes to request a change in a time period ... for a particular requirement shall request the adjustment in writing as soon as practicable before the subject activity is required to take place” and that the “owner or operator shall include in the request whatever information he or she considers useful to convince the Administrator that an adjustment is warranted.”<sup>7</sup> The Administrator may approve a request if, in his judgment, the adjustment “is warranted.”<sup>8</sup>

While the rules anticipate that a request to change a reporting deadline would be submitted by the “owner or operator” of an affected facility, there is nothing in the rules that would prevent an industry trade association such as INGAA or GPA Midstream from submitting a request on behalf of its members and nothing that would prevent the Administrator from approving such a joint request.

### **III. Request to Revise the Subpart OOOOb Annual Reporting Deadline**

As explained in Section I above, an extension of the Subpart OOOOb annual reporting deadline and any associated recordkeeping is warranted because: (1) the time needed to gather, vet, and properly format the substantial volume of information required to be reported reasonably exceeds the nominal 90-day period provided by the rule; and (2) changes to the standards and compliance deadlines are expected to occur starting in the very near future, which will materially affect the information that might need to be included in any annual report. For these reasons, INGAA and GPA Midstream respectfully request an extension of the annual reporting deadline for affected facilities owned or operated by members of INGAA and GPA Midstream until 90-days after completion of the reconsideration actions.

Lastly, we note that some affected facilities did not or will not trigger Subpart OOOOb until some time after the effective date of May 7, 2024. While the annual reporting deadline is not as pressing for such facilities, a comparable extension is warranted for those facilities due to the upcoming changes to the standards and compliance deadlines.

Our contact information is below. INGAA and GPA Midstream appreciate EPA’s prompt consideration of this request.

Sincerely,



Scott Yager  
Vice President, Environment



Andrew Mooney  
Director, Federal Affairs

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<sup>7</sup> *Id.* at § 60.19(f)(2).

<sup>8</sup> *Id.* at § 60.19(f)(3).

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