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August 14, 2025

Aaron Szabo

Assistant Administrator for EPA's Office of Air and Radiation
Environmental Protection Agency
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CC: Abigale Tardif: Tardif.Abigale@epa.gov
Peter Tsirigotis: Tsirigotis.Peter@epa.gov

Subject: 2025 Interim Final Rule to Extend Compliance Deadlines

Dear Assistant Administrator Szabo:

On behalf of the National Stripper Well Association (NSWA) and the undersigned organizations, we write to respectfully request an amendment to the **2025 Interim Final Rule to Extend Compliance Deadlines** for the oil and natural gas sector.

As background, throughout our multiple recent meetings with EPA staff, many of the undersigned have shared technical studies, operational data, and the economic realities of our industry. We are sincerely grateful for the professionalism, openness, and mutual respect shown by the Agency during these engagements.

Following those meetings, we reviewed the recently released Interim Final Rule under the Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022, 40 CFR part 60, subpart OOOOb (89 FR 16820, March 8, 2022).

First, we want to express appreciation for the extension provided for state implementation of OOOOc, which reflects a thoughtful recognition of the current challenges our businesses face. However, we were surprised and disappointed to find that an extension was not provided for the initial annual report under OOOOb.

Given that this reporting requirement may be subject to change—or potentially rendered moot—by the Agency's ongoing reconsideration of the Methane Rule, it is both reasonable and consistent with past EPA practice to pause enforcement of a rule under review.

In addition, it is essential that small producers be granted parity in compliance relief, particularly in areas where it is critical that the broad based extension be granted 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 provided in OOOOb; 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 and (3) according to multiple studies provided to EPA staff the cost benefit of regulating stripper well emissions cannot be demonstrated.

We therefore respectfully urge EPA to amend the Interim Final Rule to include a 540-day extension for the OOOOb reporting requirement (initial annual report under the Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022, 40 CFR part 60, subpart OOOOb (89 FR 16820, March 8 2024))—aligning it with the compliance schedule provided for other elements of the rule.

The National Stripper Well Association represents independent, family businesses that operate approximately 80% of America’s Oil and Gas wells, producing 1 million barrels per day, which is 15% of the domestic oil and gas production in America.

These low-volume “stripper” wells are primarily located throughout rural America in 32 states. They experience minimal annual production declines and, therefore, provide long-term, well-paying jobs—delivering a dependable stream of oil and gas every day, year after year.

Our members stand ready to continue engaging constructively with EPA as this important regulatory process moves forward. Please do not hesitate to reach out should you need additional data or clarification.

Best regards,

A handwritten signature in blue ink, appearing to read 'Patrick Montalban', enclosed in a light blue oval.

Patrick Montalban
Chairman, National Stripper Well Association
(405) 228-4112

Arkansas Independent Producers & Royalty Owners

California Independent Petroleum Association

Colorado Alliance of Mineral and Royalty Owners

Domestic Energy Producers Alliance

Eastern Kansas Oil & Gas Association

Gas and Oil Association of WV, Inc.

Illinois Oil & Gas Association

Independent Oil and Gas Association of New York

Independent Petroleum Association of America

Independent Petroleum Association of New Mexico

Indiana Oil & Gas Association

Kansas Independent Oil & Gas Association
Kentucky Oil & Gas Association
Louisiana Oil and Gas Association
Michigan Oil & Gas Association
Montana Petroleum Association
Montana Stripper Well Association
Nebraska Petroleum Producers Association
New Mexico Oil & Gas Association
North Dakota Petroleum Council
Ohio Oil and Gas Association
Oklahoma Energy Producers Alliance
Panhandle Producers & Royalty Owners Association
Permian Basin Petroleum Association
Pennsylvania Independent Oil & Gas Association
Pennsylvania Independent Petroleum Producers Association
Southeastern Ohio Oil and Gas Association
Texas Alliance of Energy Producers
Texas Independent Producers & Royalty Owners Association
Utah Petroleum Association