



October 6, 2022

Chris Grundler
Director
Climate Change Division, Office of Atmospheric Programs (MC-6207A)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Submitted via: Regulations.gov

Re: Revisions and Confidentiality Determinations for Data Elements under the Greenhouse Gas Reporting Rule; Docket No. EPA-HQ-OAR-2019-0424

Dear Director Grundler:

On June 21, 2022, the U.S. Environmental Protection Agency (U.S. EPA) published a proposed to amend specific provisions in the Greenhouse Gas (GHG) Reporting Rule. The Ohio Oil and Gas Association (OOGA, or the "Association") is pleased to provide the following comments on the Proposed Rule.

The Association is one of the largest and most active state-based oil and natural gas associations in the United States and has been the representative of Ohio's oil and gas producing industry since 1947. OOGA's members are involved in all aspects of the exploration, development, production and marketing of crude oil and natural gas resources in Ohio. The Association's members often rely on the Association as their primary source of information on industry trends, activities, tax changes, legislation and regulatory issues. The Association frequently participates in federal and state regulatory actions affecting the oil and gas industry.

In addition to the general comments made herein, we support those comments submitted separately by other organization, specifically the American Petroleum Institute (API) and the Independent Petroleum Association of America.

The Ohio Oil and Gas Association's members and the oil & gas industry, understands the importance of reducing GHG emissions. The industry has made great progress over the years implementing new technologies to further decrease GHG emissions, despite EPA's antiquated GHG Reporting Program standardized emissions factor-based approach for calculating GHG emissions that does not properly reflect GHG emissions. In most cases, this approach overestimates GHG emissions. Instead of prescribing a "one-size-fits-all" approach, OOGA recommends that U.S. EPA encourages innovative technologies to reduce GHG emissions instead of ill-fitting regulations that do not allow for the use of proven, emerging emission reduction monitoring technologies.

Ohio's oil and gas industry is comprised of many operators that meet the definition of a small business. The Greenhouse Gas Reporting Rule will significantly impact smaller operators due to the large increase in reporting activities. A large number of these operators do not have the technical expertise or staff to comply with this large increase of costly reporting requirements. Before proposing this rule, the U.S. EPA should have conducted outreach to smaller operators to realize the impacts this rule will have on their day-to-day business functions.

The Association appreciates the opportunity to comment on the Proposed Rule. We look forward to continuing to work with the Agency in the development of regulations that provide regulatory certainty for the oil and gas industry. If you have any questions, please contact Stephanie Kromer at stephanie@ooga.org.

Respectfully submitted,

A handwritten signature in cursive script that reads "Stephanie Kromer".

Stephanie Kromer
Director of Legislative and Regulatory Affairs