

## **Advocacy Requests EPA Extend the Comment Period on its Proposed Methane Rules for the Oil and Natural Gas Industry**

On November 15, 2021, the Environmental Protection Agency (EPA) published a proposed rule titled “Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review.” On December 13, 2021, EPA announced an extension of the public comment period. The Office of Advocacy’s (Advocacy) has filed a public comment requesting an additional extension of the public comment period for this proposed rule.

Small businesses and trade associations that represent their interests have expressed their concern to Advocacy that the complexity of the EPA proposal, the open-ended nature of some of the requests for comments, ambiguities in the proposal due to a lack of regulatory text, and the large number of previously unregulated sources that might be subject to the rule are making it extremely difficult to fully understand and comment on the rule. Small businesses want to contribute to EPA’s understanding of the oil and natural gas production industry, correct potential errors in EPA’s calculations, and project the unintended negative consequences of this proposal, to industry participants, to their suppliers and customers, and to the environment.

Advocacy urges EPA to extend further the public comment period to allow for small businesses to participate more meaningfully in this rulemaking process. Such extension will allow small businesses the time and preparation necessary to provide comprehensive and detailed comments and participate meaningfully in the regulatory process.

A complete copy of Advocacy’s letter to EPA is available at: <<insert link>> For more information please contact Dave Rostker, Assistant Chief Counsel, at david.rostker@sba.gov.

