



October 1, 2025

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPAHQ-OAR-2025-0162
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: EPA-HQ-OAR-2025-0162: Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Final Rule. Submitted via www.Regulations.gov and a-and-r-docket@epa.gov.

To Whom It May Concern:

The Marcellus Shale Coalition (MSC), a regional trade association with a national membership, appreciates the opportunity to submit comments for consideration on the Interim Final Rule (IFR) referenced above.

The MSC was formed in 2008 and is currently comprised of approximately 155 member companies who are fully committed to working with local, state and federal government officials and regulators to facilitate the development of the natural gas resources in the Marcellus, Utica and related geological formations. Our members represent many of the largest and most active companies in natural gas production, gathering, processing, transmission and utilization in the country, as well as the supply chain companies, contractors, professional service firms, and the skilled trades who work with the industry.

Comments

The MSC supports the IFR and the compliance extensions included within it. Many stakeholders, including the MSC, submitted comments on the 2024 Final Rule throughout its development, and raised significant concerns related to how tenable the established compliance deadlines were for the identified source categories as well as for states required to implement standards for existing sources as identified in the IFR. U.S. EPA has correctly identified supply chain and stack testing company availability concerns for implementing the rule in the timeline associated with the 2024 Final Rule. This concern is exacerbated given the need of the individual states to incorporate the requirements of the 2024 Final Rule into their own plans and seek approval from U.S. EPA, the status of which for various states was summarized in the IFR preamble. For example, while the Commonwealth of Pennsylvania conducted a comment period on its

proposed state plan to comply with the 2024 Final Rule, it has not developed nor released for public review and comment a new permit which it identified as essential to implementing its proposed state plan. Concerns over the breadth and scope of such a new permit, and its ability to be implemented in a timely manner, underscore the many different concerns operators have expressed with the current litany of compliance deadlines embedded in the 2024 Final Rule.

Collectively, these concerns support the need to extend the various compliance deadlines as contained in the IFR. Extending these deadlines will allow for a thoughtful reconsideration of the substantive provisions of the 2024 Final Rule, announced on March 12, 2025. The MSC and its members welcome the opportunity to work with U.S. EPA on this reconsideration to ensure that a revised final rule is workable, reflects the realities of how the oil and natural gas sector operates, provides for reasonable and prudent safeguards of the environment, and includes appropriate parameters and direction to the various states charged with its implementation and enforcement.

Conclusion

Thank you again for the opportunity to provide these comments in support of the IFR. Should you have any questions or desire to discuss these comments and related matters in more detail, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Welty", with a long horizontal flourish extending to the right.

Jim Welty
President

