



August 5, 2026

U.S. Environmental Protection Agency
EPA Docket Center
Office of Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: EPA–HQ–OAR–2025–1348: Proposed Rule: National Emission Standards for Hazardous Air Pollutants: Crude Oil and Natural Gas Production Facilities and Natural Gas Transmission and Storage Facilities. 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 Proposed Rule 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.

Introduction

MSC member companies are proud of the industry's contributions to meeting the energy needs of the citizens of the United States. Domestic energy production, and particularly the growth of natural gas production and use throughout the past two decades of the shale revolution, has helped to strengthen our nation's energy security, positively impact the geopolitical state of the world by aiding our allies, and helped to enhance the lives of millions of people both within the United States and abroad that have suffered from energy poverty.

It is noteworthy that this exponential growth in production – Pennsylvania, for example, has gone from the 15th largest natural gas producing state to the 2nd largest over the past 15 years, producing nearly 20% of the nation's supply – has occurred in conjunction with strong industry-

led efforts to limit emissions, protect our shared environment, and maximize product recovery that is available to deliver to consumers.

For example, the Appalachian Basin boasts the lowest methane intensity of the top eight producing basins in the United States. Compare this to Russia, where the methane intensity is 65% higher than the U.S. average. This American success story allows our nation to deliver more natural gas to aid our allies, while protecting consumer cost impacts and expanding the available supply of natural gas to meet domestic needs, particularly in electric power generation and manufacturing.

Comments

The MSC appreciates the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) proposed technology and reconsideration of the 2012 Final Rule National Emissions Standards for Hazardous Air Pollutants: Crude Oil and Natural Gas Production Facilities and Natural Gas Transmission Facilities (NEHSAP HH and HHH). The MSC also incorporates by reference the detailed technical comments submitted by the American Petroleum Institute (API) and the GPA Midstream Association (GPA Midstream), which provide additional justification and analysis supporting the positions outlined below.

Support for Maintaining Existing Standards

The MSC supports the U.S. EPA's proposal to maintain currently regulated standards without modification. The existing framework remains appropriate and effective and the record does not demonstrate a need for additional regulatory requirements under this review.

The MSC also agrees with the conclusion that BTEX is an appropriate surrogate for HAP control and that methanol emissions are effectively addressed through the existing BTEX control framework. Combustion controls and non-combustion controls achieve comparable emission reductions for both BTEX and methanol, as demonstrated through GPA Midstream's analysis of BTEX and methanol emission reductions when controlled using BTEX condensers across a range of model input variables. Accordingly, MSC supports GPA Midstream's conclusion that the existing BTEX control framework provides an effective surrogate for methanol emissions control at both large and small dehydration units.

Small Dehydration Units

As EPA acknowledges in the proposal, methanol is not generally a naturally occurring constituent present in extracted oil and natural gas. Rather, methanol emissions are primarily associated with locations where methanol is intentionally injected as a hydrate inhibitor. For that reason, any final methanol requirements should be narrowly focused on operations where methanol is added as a processing aid at the facility. Extending methanol requirements to facilities where methanol is not utilized would impose unnecessary compliance obligations without corresponding environmental benefit.



For small dehydration units, MSC supports API's recommendation that the U.S. EPA should limit the proposed HH standards for methanol emissions to operations that add methanol as a processing aid at the facility. EPA should also recognize that adding methanol as a regulated HAP may create additional sampling, testing, recordkeeping, and compliance demonstration obligations that were not previously required under Subpart HH.

Because the proposed small dehydration unit standards could create a more burdensome compliance framework than the standards applicable to large dehydration units, MSC also supports GPA's recommendation to allow owners or operators to elect compliance with the large dehydration unit standards as a means of satisfying the small dehydration unit standards.

Alternative Standards under CAA 112(d)(6)

MSC supports EPA's conclusion that no new standards for previously unregulated emission sources are required under CAA section 112(d)(6). However, should U.S. EPA choose to finalize the alternative standards presented, there are several considerations that should be addressed before such standards are finalized. MSC supports GPA Midstream's comments on the alternative standards including the cost-effectiveness implications of controls on acid gas removal units, small dehydration unit compliance date gaps, and ensuring alignment of process controller and pump requirements with the New Source Performance Standards (NSPS) OOOOb/c requirements.

Many of the emission sources considered under the alternative proposal are already addressed through existing federal and state requirements, including NSPS OOOOa, OOOOb, and OOOOc programs. Establishing overlapping HH/HHH requirements would increase administrative burden while offering limited, if any, incremental emissions reductions.

To the extent EPA finalizes standards for previously unregulated emission sources, MSC encourages the EPA to align compliance requirements, monitoring obligations, and implementation timelines with the requirements already established under NSPS OOOOb and OOOOc. Consistent regulatory approaches will reduce unnecessary compliance complexity while maintaining equivalent environmental performance.

Process Simulation Modeling

The MSC supports EPA's proposal to allow additional process simulation software for compliance demonstrations. Also, MSC recommends generically referencing process simulation tools rather than using trademarked names and versions, which could result in quickly outdated software and potential compliance risk. Additionally, MSC supports grandfathering past compliance demonstrations conducted using GRI-GLYCalc™ to prevent regulatory ambiguity.



OGI and Appendix K Alternative

Finally, the MSC supports the use of optical gas imaging (OGI) and Appendix K as an alternative for Method 21 LDAR at gas processing plants. Many facilities already employ OGI programs to comply with NSPS requirements. Providing this alternative under HH/HHH would improve regulatory consistency, eliminate duplicative monitoring efforts, and maintain effective leak detection performance while preserving operator flexibility.

Conclusion

Thank you again for the opportunity to provide these comments. 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,



Patrick Henderson

Vice President, Government Affairs and Communications