



Peter Tsirigotis, Director or Acting Director
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, D.C. 20460

March 2, 2017

Re: November 2016 Oil and Gas Information Collection Request

Dear Director Tsirigotis or Acting Director:

As you are aware, the U.S. Environmental Protection Agency's ("EPA" or the "Agency") Office of Air and Radiation commenced an Information Collection Request ("ICR") effort to collect information and data from the crude petroleum and natural gas extraction sector in November of 2016. Subsequently, the Agency granted a number of requests for extensions of the ICR response deadline made by American Exploration & Production Council ("AXPC") member companies. AXPC sincerely thanks EPA for granting such extensions. Nevertheless, before deadlines (including Agency-extended deadlines) to respond to the ICR are upon our membership, AXPC submits this written request for formal suspension of the ICR.

AXPC is a national trade association representing 33 of America's largest and most active independent oil and natural gas exploration and production companies. AXPC members are "independent" in that their operations are limited to exploration for and production of oil and natural gas. Moreover, our members operate autonomously, unlike their fully integrated counterparts, which operate in additional segments of the energy business, such as downstream refining and marketing. AXPC members are leaders in developing and applying innovative and advanced technologies necessary to explore for and produce oil and natural gas, both offshore and onshore, from non-conventional sources.

As provided in EPA's *Information Collection Request Supporting Statement*, ICR No. 2548.01: Information Collection Effort for Oil and Gas Facilities, U.S. EPA, Sector Policies and Programs Division (Sept. 22, 2016) and in the Agency's November 2016 ICR requests for information issued to AXPC member companies the "information collection request is necessary to develop nationally applicable regulations to reduce methane emissions...from oil and gas sources." EPA has further provided, "[c]urrently available information for oil and gas facilities is incomplete to assess what may be the best approach for regulating these sources." *Information Collection Request Supporting Statement* (pg. 5).

AXPC supports the Agency's efforts to better understand the oil and gas industry before promulgating additional air quality regulations. However, the collection of information necessary to develop appropriate regulation must be born from meaningful stakeholder input (beyond the required public comment process) and must be tailored to the specific end goal. AXPC submits to EPA that the pending ICR effort did not fully vet all stakeholder input and is not tailored to the end goal of identifying the "best approach" for regulating existing oil and natural gas extraction emission sources. These points and

additional observations are provided in AXPC's ICR comment letters filed with EPA on August 2, 2016 and October 31, 2016 (attached hereto).

AXPC requests immediate suspension of the ICR. ICR suspension will allow the Agency to initiate a transparent and robust stakeholder process to evaluate what data is necessary and to rework the strategy by which such data is requested and collected. Stakeholders such as the state agencies responsible for establishing future standards of performance to achieve federal emission performance guidelines under §111(d) of the Clean Air Act and industry will have the opportunity to provide meaningful perspective and expertise to EPA through this process. Upon suspension and review/re-evaluation of the ICR, EPA will be equipped to (1) determine whether additional information is needed and (2) if so, develop an improved ICR that will ensure the collection of accurate and focused data and information. From there, the Agency will be in an ideal position to identify the "best approach" to regulate the oil and natural gas extraction sector. AXPC is committed to working with EPA through this process. Further, careful consideration of the existing national air quality regulatory landscape and emission reductions from the oil and natural gas sector realized to date may only highlight the need to support or adjust existing regulations, instead of pursuing additional rules.

AXPC appreciates EPA's timely response to this request. AXPC is grateful for the opportunity to commence a dialog with the Agency on the most effective and efficient method of data collection. We look forward to working with you. Please contact me by email at bthompson@axpc.us or by phone at either my office (202-347-7529) or my mobile (303-638-7979) should you have any questions or require additional information.

Sincerely,



Bruce Thompson
President
American Exploration & Production Council

cc: Scott Pruitt, Administrator, U.S. Environmental Protection Agency
Brenda Shine, Sector Policies and Programs Division, Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency