
October 25, 2018

Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

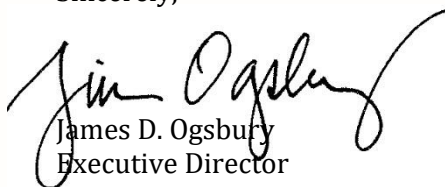
Dear Acting Administrator Wheeler:

The Environmental Protection Agency (EPA) has [proposed](#) revisions to its final rule, Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources ([81 FR 35824](#) June 3, 2016). Western Governors had requested that EPA consult with states in advance of the 2016 rulemaking to avoid duplicative regulation ([May 20, 2015 letter](#)). This consultation did not occur. Western Governors therefore support EPA's decision to review this rule.

Many western states have already implemented regulatory strategies to reduce methane emissions from oil and gas operations, and EPA should recognize these reductions in its regulation of methane (WGA Policy Resolution [2018-05, Air Quality and Methane Emissions Regulation](#)). According to the proposal, EPA has determined that certain existing state programs are equivalent to or go beyond the rule's proposed amendments. EPA has proposed that these state requirements can be alternatives to EPA's requirements and has provided an opportunity for other states to apply for similar consideration.

Western Governors appreciate EPA's review and incorporation of existing state programs into the proposed revisions. We urge EPA to engage in meaningful and substantive consultation with states regarding these changes prior to finalizing the proposal.

Sincerely,



James D. Ogsbury
Executive Director