



November 23, 2021

U.S. Environmental Protection Agency  
EPA Docket Center  
Docket ID No.  
EPA-HQ-OAR-2021-0317  
Mail Code 28221T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

cc: Karen Marsh, EPA OAQPS

To Whom It May Concern:

We are writing on behalf of the members of the National Association of Clean Air Agencies (NACAA) and the Association of Air Pollution Control Agencies (AAPCA) regarding the U.S. Environmental Protection Agency's (EPA's) proposed rule, "Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review," which was published in the *Federal Register* on November 15, 2021 (86 Fed. Reg. 63,110). AAPCA and NACAA are the national, non-partisan, non-profit associations of air pollution control agencies in the states, cities, counties, and territories across the United States.

The aforementioned November 15, 2021 *Federal Register* notice established a deadline of January 14, 2022 for public comment on the proposal. We request that EPA extend the public comment period by at least 30 days and notify the public of the extension as soon as possible and well in advance of the January 14 deadline so commenters may make full use of the additional time.

The provisions contained in EPA's proposal are complex and have significant ramifications. Indeed, EPA has requested comment and information on a long list of issues that may require modeling or other analyses to understand. Performing these analyses will necessitate longer than the comment period currently allows. Air quality agencies need a minimum amount of time to review the extensive background materials, gather data, consider the impacts of the proposed changes, and prepare comments, and the intervening holiday season will introduce obstacles to the ability of our respective organizations to coordinate and convene discussions for members. To ensure that state and local agencies have an adequate opportunity to review and respond to the proposal, additional time beyond the 60-day comment period is necessary.

In light of the considerations discussed above, and because there is no statutory or court-ordered deadline associated with the proposed rule, we request that EPA extend the comment

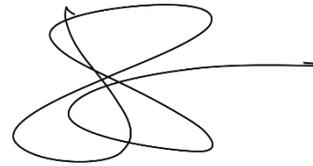
deadline by a minimum of 30 days, to February 14, 2022 (or later) to allow state and local agencies and others to fully consider and respond to the proposal.

Thank you for your consideration of our request.

Sincerely,

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Miles Keogh, NACAA

A handwritten signature in black ink, appearing to read 'Jason Sloan', with a long horizontal stroke extending to the right.

Jason Sloan, AAPCA