
PRESENTATION TO IOGCC

EPA 0000b/c Rule Status and Reconsideration Efforts

May 2026

EPA's 2024 'Methane Rule' – NSPS 0000b / EG 0000c

Mar 8, 2024

EPA published final rule

May 7, 2024

Effective date

Regulates methane and VOC emissions across production operations — well sites, compressor stations, storage vessels, pneumatic controllers, flaring, and LDAR — extending into gathering and boosting

- **NSPS 0000b** — Emissions standards for new, modified, and reconstructed sources for facilities constructed/modified *after* Dec. 6, 2022
- **EG 0000c** — GHG guidelines for existing sources, implemented through state plans to sources *existing* as of Dec. 6, 2022

Affects thousands of new sources annually, and hundreds of thousands of existing sources nationwide

Bottom Line: Rule Still in Motion



1. 2024 rule remains the baseline

OOOOb applies to new, modified and reconstructed sources; OOOOc sets state-plan requirements for existing sources.

2. Compliance timing has shifted

EPA extended several OOOOb deadlines and moved the OOOOc state plan deadline to January 22, 2027.

3. Reconsideration is ongoing

EPA finalized narrow changes on flaring and NHV monitoring and says another proposal is under development.

Phased Reconsideration

MARCH 12

2025

Administrator Lee Zeldin
announces comprehensive
reconsideration

Petitions for Reconsideration

- Multiple industry petitions filed for reconsideration of certain provisions
- Initially granted by the Biden Administration; reconsideration effort now expanded by the Trump EPA

Reconsideration Framing

- EO 14154 — Unleashing American Energy
- EO 14156 — National Energy Emergency
- EO 14192 — Unleashing Prosperity Through Deregulation

EPA Path Forward

- **Phase 1:** targeted technical revisions (April 2026 — finalized) for NHV monitoring and temporary flaring in certain situations
- **Phase 2:** broader reconsideration in development; proposal expected this summer

Two Extensions in 2025 — For Targeted Relief

EPA issued extension actions to provide compliance relief during active reconsideration efforts

- July 31, 2025 — EPA issued Interim Final Rule extending compliance deadlines
- Dec. 3, 2025 — EPA finalized the IFR with additional extensions; provisions not explicitly extended remain in force

Key Dates:

0000b Direct Federal Standards	
June 1, 2026	NHV continuous monitoring requirement for flares/ECDs (or 14 day exclusion testing)
Nov. 30, 2026	Initial annual NSPS 0000b reporting
Jan. 22, 2027	TOC testing (ECDs); NIE for C CVS inspections; LE valve packing; zero-emissions controller replacement; storage vessel emission limits; Super Emitter Program
0000c State Plans Under CAA §111(d)	
Jan. 22, 2027	State plans due to EPA (must include only enforceable provisions); additional extension possible in reconsideration → EPA has indicated willingness to work with states given that certain provisions are still in flux

April 2026 Final Technical (Narrow) Reconsideration

Action Summary

- April 4, 2026 — EPA Admin. Zeldin signed final rule
- Discrete technical changes to two narrow aspects of the 2024 rule
- Responsive to petitions for reconsideration granted May 6, 2024

\$2.5 Billion cost savings — ~\$208M/year
(2024-2038, 3% discount)

01 Temporary Flaring of Associated Gas

Extended baseline limits and added an exigent-circumstances pathway for site-access constraints.

02 Net Heating Value (NHV) Monitoring

Expanded exempt streams, allowed upstream representative sampling, removed select monitoring for assisted flares/ECDs.

Temporary Flaring of Associated Gas



Key Provisions

- Applies to malfunctions, safety events, repairs, and maintenance activities
- Operator must cease flaring upon resolution of the malfunction or upon reaching the time limit, whichever occurs first
- Recordkeeping and reporting requirements apply when relying on the exigent-circumstances pathway

Net Heating Value (NHV) Monitoring Changes

Expanded Exemptions

Exempt gas streams now apply to all flare types and ECDs — both new and existing sources.

Targeted Retention

Monitoring retained only where inert gases are added or other scenarios decrease NHV.

Upstream Sampling

Sampling permitted upstream of the control device when representative of the gas stream.

Practical 14-Day Window

Breaks allowed across weekends/holidays for 14-day sampling — no more than 3 operating days gap.

Removed Requirements

NHVcz and NHVdil monitoring removed for air/steam-assisted flares and ECDs at existing sources.

Net Effect

Monitoring scope sharply narrowed; reporting burden reduced for typical operations.

Flaring Guidance – Clarifying Reference

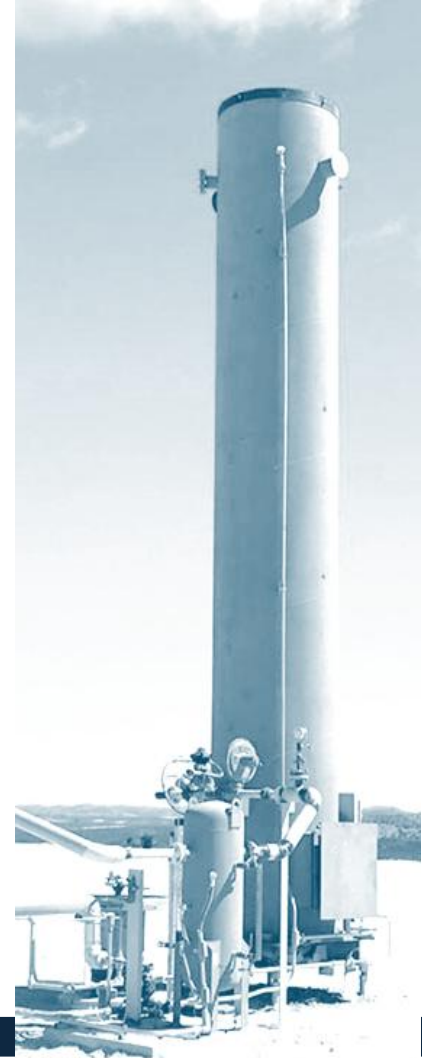
MAY 1

2026

EPA issues guidance
on continued routine
flaring after May 7, 2026

Scope and Effect

- *Clarifies* that discretion to allow flaring at OOOOb facilities remains in limited circumstances after the May 7, 2026 phase-out deadline
- *EPA believes it is not appropriate to require the shut-in a well because of circumstances outside an operator's control*
- Issued in response to concerns from operators in the Williston Basin (Bakken) and Permian Basin



Broader Reconsideration — What's Next

Scope and Timing

- EPA characterizes Phase 1 as an "important first step" but another proposal is in development
- EPA has indicated proposal this summer; intent to finalize by year-end 2026
- EPA leadership has shared some broad decisions on scope

Categories Identified so far:

01

Covers and closed-vent systems

02

Super Emitter Program

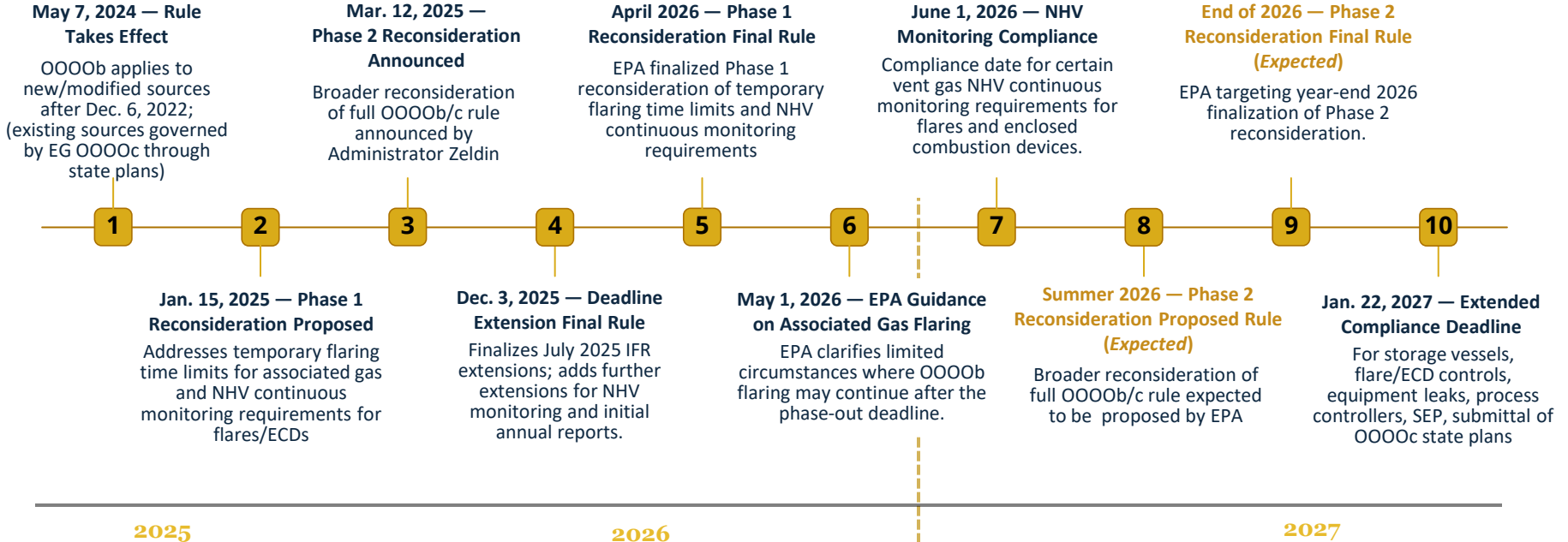
03

Combustion devices and control device issues

04

Treatment of marginal & conventional wells

0000b/c Timeline



Status of Pending Challenges

2024 Final OOOOb/c Rule Challenges

- Challenged in D.C. Circuit and U.S. Supreme Court (emergency stay applications)
- Petitioners: broad coalition of states, trade associations, individual companies, environmental organizations
- D.C. Circuit denied stay motions - July 9, 2024
- U.S. Supreme Court denied emergency stays - Oct. 4, 2024
- Merits challenges currently held in abeyance during reconsideration

Deadline Extension Rule Challenges

- Interim-Final-Rule (IFR) and Final Rule separately challenged in the D.C. Circuit
- March 2, 2026: court dismissed IFR cases as moot
- Court directed parties to brief on the Final-rule challenge
 - Briefings summer 2026
 - Final briefs due Sept. 1, 2026
- Revised compliance deadlines remain operative pending the litigation outcome



Discussion & Questions