

Exhibit A

Supporting Statement for EPA Information
Collection Request Number 2547.02
EPA's Voluntary Methane Challenge and
Natural Gas STAR Programs

Table of Contents

1 Identification of the Information Collection	4
1(a) Title of the Information Collection	4
1(b) Short Characterization/Abstract.....	4
Natural Gas STAR Program	4
Methane Challenge Program	5
Other Activities:	6
1(c) Terms of Clearance of the Information Collection	6
2 Need for And Use of The Collection.....	7
2(a) Need/Authority for the Collection.....	7
2(b) Practical Utility/Users of the Data	7
3 Nonduplication, Consultations, And Other Collection Criteria	8
3(a) Nonduplication	8
3(b) Public Notice Required Prior to ICR Submission to OMB	9
3(c) Consultations	9
Natural Gas STAR and Methane Challenge ONE Future Partners:	9
Natural Gas STAR Partner:	9
Methane Challenge BMP Partner:	10
3(d) Effects of Less Frequent Collection	10
3(e) General Guidelines	10
3(f) Confidentiality	10
3(g) Sensitive Questions.....	11
4 The Respondents and The Information Requested	11
4(a) Respondents/NAICS Codes	11
4(b) Information Requested	11
Natural Gas STAR Program	11
Methane Challenge Program	13
Service Provider Directory	16
5 The Information Collected-Agency Activities, Collection Methodology, And Information Management	16
5(a) Agency Activities.....	16
Natural Gas STAR Program	16
Methane Challenge Program	17

Service Provider Directory 17

5(b) Collection Methodology and Management 18

5(c) Small Entity Flexibility 18

5(d) Collection Schedule 18

6 Estimating the Burden and Cost of The Collection 19

6(a) Estimating Respondent Burden 19

6(b) Estimating Respondent Costs 21

 6(b)(i) Estimating Labor Costs 21

 6(b)(ii) Estimating Capital and Operations and Maintenance Costs..... 22

 6(b)(iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs 22

 6(b)(iv) Annualizing Capital Costs 22

6(c) Estimating Agency Burden and Costs 22

6(d) Estimating the Respondent Universe and Total Burden and Costs..... 22

 Methane Challenge Program 22

 Natural Gas STAR Program 25

6(e) Bottom Line Burden Hours and Costs 31

 6(e)(i) Respondent Tally..... 31

 6(e)(ii) The Agency Tally 31

 6(e)(iii) Variations in The Annual Bottom Line 31

6(f) Reasons for Change in Burden 32

6(g) Burden Statement..... 32

1 Identification of the Information Collection

1(a) Title of the Information Collection

“EPA’s Voluntary Methane Challenge and Natural Gas STAR Programs,” EPA ICR number 2547.02, OMB Control Number. 2060-0722.

1(b) Short Characterization/Abstract

The oil and natural gas industry is the second largest source of anthropogenic methane emissions in the U.S., according to the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2018. Methane is the primary component of natural gas and a potent greenhouse gas. Since 1993, the US Environmental Protection Agency’s (EPA) Natural Gas STAR Program has encouraged oil and natural gas companies to adopt cost-saving technologies and practices that improve operational efficiency and reduce methane emissions. The Program is non-regulatory in nature, supporting Partner companies in making voluntary efforts to implement recommended technologies and report related methane emissions reductions to EPA. In 2016, EPA launched a new program--the Methane Challenge Program. This Program leverages the methane-reducing best practices and technologies developed by the industry and showcased through the Natural Gas STAR Program over the past 20+ years and creates a mechanism for oil and natural gas companies to make ambitious, voluntary commitments to reduce their methane emissions. Methane Challenge Partners submit detailed data to the Program each year so EPA, and the public, can track the progress Partners are making towards these commitments.

For this renewal, EPA proposes to combine the information collection for the Methane Challenge Program with the collection for the Natural Gas STAR Program, OMB control number 2060-0328. This will result in an overall increase in burden for this ICR number because the Natural Gas STAR respondents are being added; however the overall burden is less than the sum of the burden for the two individual ICRs.

Natural Gas STAR Program

The Natural Gas STAR (NGS) Program works with oil and natural gas companies across the value chain (i.e., the production, gathering & processing, transmission, and distribution segments), to remove barriers to implementing technologies and practices that reduce methane emissions. The NGS Program offers Partner companies flexibility to participate at whichever scale (e.g., number of facilities, number of emission sources, etc.) works best for their operational context, business plan, and sustainability goals.

The Program is a collaboration of regional and national industry Partners that actively engage in sharing Best Management Practices (BMPs) with one another, and other companies in the industry. This promotes the adoption of emission reduction technologies and practices by helping NGS Partners evaluate BMPs in the context of their current operations and implement them where cost effective. Implementation of the these BMPs saves participants money, improves operational efficiency, and enhances the protection of the environment. The goal of the Program is to foster collaboration, networking, and technical information sharing; Partner companies are encouraged to report their methane emissions reductions to EPA, but there is no specific commitment to do so.

Oil and natural gas companies become Natural Gas STAR Partners by completing and submitting a Partnership Agreement that outlines responsibilities of the Partner company and EPA. The agreement

commits a Natural Gas STAR Partner to evaluate methane emission reduction opportunities and to implement BMPs that reduce methane emissions. As mentioned above, Natural Gas STAR Partners can report annually on their voluntary actions and resulting emission reductions, though are not required to do so. Natural Gas STAR Partners that choose to report enter data about their voluntary actions undertaken during the year and resulting methane emission reductions on Excel reporting forms. They then submit these forms to the Program via e-mail.

The current, optional Implementation Plan templates have not been used by Partners in 4 years. EPA proposes to remove them to create a more streamlined program. This change will reduce the total burden estimate for companies participating in Natural Gas STAR.

Methane Challenge Program

The Methane Challenge (MC) Program was developed, and continues to be refined, through extensive stakeholder engagement and with support from companies and trade organizations in the oil and gas industry. Methane Challenge expands upon the key learnings made by NGS Partners and provides an innovative mechanism for oil and natural gas companies to make ambitious and quantifiable voluntary commitments to reduce methane emissions across their operations. The Program works with oil and natural gas companies in the onshore production, gathering and boosting, processing, transmission and underground storage, and distribution segments.

Methane Challenge offers two commitment options for Partners. Both focus on reducing methane emissions across a company's operations using different approaches. In the Best Management Practice (BMP) Commitment Option, Partners commit to implement specific practices and technologies to reduce methane emissions from specific emission sources. In the ONE Future Emissions Intensity (ONE Future) Commitment Option, Partners commit to achieve a specified methane emission intensity target. Throughout the course of its commitment, the company has flexibility in determining which emission sources to mitigate and which practices/technologies to implement to achieve its target intensity rate. Companies can join one or both commitment options.

Companies become Methane Challenge Partners by completing and submitting a Partnership Agreement that outlines responsibilities of the Methane Challenge Partner company and EPA. In the BMP Partnership Agreement, a company commits to mitigate emissions from at least one methane emissions source using technologies/practices specified in the Program's Technical Document. In the agreement, the Partner will specify a start date and a target achievement year for its commitment(s). The achievement year must not exceed five [5] years from the commitment start date. ONE Future Commitment Partners commit to a segment-specific intensity target by a certain year. Collectively, the ONE Future Partners commit to a goal of reducing methane emissions across the natural gas value chain to 1% or less by 2025. The ONE Future collective, and segment-specific, intensity targets have been established by the ONE Future industry coalition. EPA collaborates with this group on the ONE Future commitment option, but the two are separate Programs.

The voluntary partnership agreement can be terminated by the Methane Challenge Partner or by EPA with no notice or penalties and no further obligation.

Methane Challenge Partners also agree to submit an Implementation Plan within six [6] months of signing the Partnership Agreement and to annually report on their methane emissions, voluntary

actions, and resulting emission reductions. Transparency through annual reporting is a key component of the Program, and a requirement for participation.

Program Partners report annually to the EPA through the electronic Greenhouse Gas Reporting Tool (e-GGRT) system. EPA leverages data reported to the Greenhouse Gas Reporting Program (GHGRP) through the Petroleum and Natural Gas Systems source category (Subpart W) (under OMB Control Number 2060-0629) to track Program activities. Partners also report supplemental data to comprehensively track progress towards their source-specific commitments, including data that enables Partners to highlight emission reductions achieved through voluntary action. Data elements to be reported are provided in detailed “Technical Document” for each commitment option. Methane Challenge reports are due annually each fall (on a date to be specified by the EPA). A Partner is expected to begin reporting after its first full calendar year of participation in the Program. EPA compiles and publicly releases (i.e., on the EPA website) all non-confidential data submitted to the Methane Challenge Program to track the progress of individual Partner companies in meeting their Program commitments.

Because Partners do not report in their first year, and the majority of current Program Partners were founding partners, the average number of annual respondents expected for annual reports will be higher in this renewal than in the Program’s first ICR. As such, the Agency estimates the overall respondent burden for the Methane Challenge Program will increase, however the burden estimate per respondent has not changed for BMP Partners and has decreased for ONE Future partners.

Other Activities:

In addition to the core Program data collection, EPA also tracks a few additional data elements that help improve program implementation including changes to partner's contact information or changes in operating circumstances of a company. Further, as a service to Partners, EPA also maintains a “service provider directory” to share information on services and technologies available to oil and natural gas companies seeking to reduce methane emissions from their operations. Service provider companies fill out a short form one time to be included on the directory. EPA does not endorse any company or product in the directory.

1(c) Terms of Clearance of the Information Collection

OMB noted the following “terms of clearance” when it renewed the Natural Gas STAR Program’s information collection request in 2015; OMB noted these terms remain in effect when the NGS Program’s ICR was renewed in 2019:

As stated in the previous terms of clearance: The data gathered under this collection represents estimates of emissions reductions associated with activities reported by participants in the Natural Gas STAR Program. Some of the activities and emissions reductions may have been achieved in the absence of the Natural Gas STAR program. For this reason, the data is not appropriate for use as an aggregate summary of emissions reductions resulting from the program, but is instead correctly characterized as activities and reductions associated with Program partners' reported activities. The Agency should exercise care to ensure that the data not be characterized inappropriately in program effectiveness measures, on the Program website, or in other communications. When this ICR is resubmitted for renewal, EPA should continue to address the extent to which the partners would have reduced their emissions in the absence of this program.

OMB noted the following “terms of clearance” when it approved Methane Challenge’s initial information collection request in 2015: *“In accordance with 5 CFR 1320, the information collection is approved for three years. EPA is reminded that the agency is required to have a valid OMB control number before the agency can conduct or sponsor a collection of information.”*[sic]

The methane emission reductions reported by Partners include reductions associated with the implementation of voluntary BMPs that result in methane emissions reductions. The methane emission reduction data that are submitted to EPA are used to determine Partner emission reduction totals and measure the overall achievements of Natural Gas STAR companies in voluntarily reducing methane emissions.

EPA recognizes that some of the activities and emissions reductions reported by Partners may have been achieved in the absence of the Program. EPA also recognizes that there are emissions reductions occurring in the industry that have been a direct or indirect result of the influence of the Program, but that are not being reported to EPA. EPA will continue to be clear in any Program-related communication that provides a summary or an aggregation of emission reductions that these reductions result from partners’ reported activities.

2 Need for And Use of The Collection

2(a) Need/Authority for the Collection

EPA has developed this ICR to obtain authorization to collect information from Partners of the Natural Gas STAR and the Methane Challenge Programs. EPA needs to collect initial information as outlined in the Partnership Agreement. The Partnership Agreement provides general information on the Partner company and includes relevant points of contact, as well as any commitments made.

The Implementation Plan (for Methane Challenge only) and annual reporting are necessary to understand a partner’s mechanisms for putting program commitments into practice, evaluate their progress in achieving these commitments, and assess overall Program results. The information provided in the Implementation Plan and submitted through the annual reporting process also allows EPA to provide technical and other assistance to partners.

2(b) Practical Utility/Users of the Data

EPA uses the information provided in the Partnership Agreement to populate its list of contacts for Partner companies (including information on current and past Methane Challenge and Natural Gas STAR partners). This serves as a source of general information and a mailing list for Partner communication.

EPA uses the information submitted in Methane Challenge Implementation Plans to learn about companies’ plans to achieve their commitments by their commitment achievement year.

EPA uses the information submitted in NGS and MC annual reports to document Partner companies’ progress in implementing the Programs and in voluntarily reducing methane emissions. For the Methane Challenge Program, annual reports are also used to quantify partners’ progress towards their Methane Challenge commitments. These “commitment progress metrics” are published on the public EPA website along with each company’s dataset. On an annual basis for both Programs, EPA also aggregates the data and provides updated Program accomplishments metrics on its website and prepares Partner summary reports.

With Partner permission, EPA uses Partner data to develop technical workshops, guidance documents on specific technologies and practices, and in some cases to prepare case studies on implementation experiences. These documents are publicly available and demonstrate the benefits that can be realized through the implementation of technologies and practices.

The two hallmarks of the Methane Challenge Program – ambitious commitments and transparency – have enabled the creation of a first-of-its-kind dataset. Partners report, and EPA publishes, facility-level information on voluntary actions to reduce methane emissions at natural gas facilities throughout the value chain. Thus, the Program can serve as a catalyst for broad industry adoption of best practices to reduce emissions.

3 Nonduplication, Consultations, And Other Collection Criteria

3(a) Nonduplication

Differences Between Methane Challenge and Natural Gas STAR

The Methane Challenge Program’s data collection differs from the Natural Gas STAR Program’s in a few ways. First, Methane Challenge collects data at a facility-level (Methane Challenge uses industry segment-specific “facility” definitions consistent with those used by the Greenhouse Gas Reporting Program Subpart W), while the Natural Gas STAR Program typically collects data aggregated at the project or company-level which can vary across Partner companies. Second, Methane Challenge collects some emission source activity data (e.g., number of emission sources at the facility, operating hours, etc) and methane emission data, while Natural Gas STAR only collects information on voluntary actions and resulting emission reductions. Third, all data submitted to Methane Challenge is made publicly available at the company and facility level. Fourth, reporting to the Natural Gas STAR Program is optional (one of several ways companies can participate in the Program), while annual reporting is required to continue to be recognized as a Methane Challenge Partner. Finally, while some companies are members of both Programs, they are instructed to report all data required by Methane Challenge to that Program and only report to Natural Gas STAR any information *not captured by their Methane Challenge reports*.

Differences Between Methane Challenge/Natural Gas STAR and Greenhouse Gas Reporting Program Subpart W

EPA implements Subpart W of the Greenhouse Gas Reporting Program (GHGRP) which requires companies report methane emissions data to EPA as of January 1, 2011. The first year of mandatory greenhouse gas data collection for the oil and natural gas industry was 2011. The GHGRP collects emissions and activity data for facilities that emit 25,000 metric tons or more of CO₂ equivalent per year.

There is no overlap between data collected by GHGRP and the Natural Gas STAR Program as the GHGRP collects *emissions* data while Natural Gas STAR Program collects *reductions* data. The Subpart W data complements and augments the Natural Gas STAR data.

On the other hand, the Methane Challenge Program does collect some emissions and activity data from its partners. However, wherever there is overlap with Subpart W reporting, non-confidential data submitted to GHGRP and used in Methane Challenge reporting is drawn from the GHGRP dataset automatically and Methane Challenge Partners do not have to re-submit that data. Methane Challenge

augments the GHGRP dataset by collecting information from facilities that emit less than 25,000 metric tons of CO₂ equivalent per year (that is, “below threshold” facilities that are not required to report the GHGRP). Further, the Methane Challenge Program collects data on methane emission reductions achieved through voluntary actions to track partners’ Methane Challenge commitments. The “voluntary action” data elements are not collected by the GHGRP, since the GHGRP only focuses on annual emissions from specific emission sources and not on reductions from voluntary actions implemented.

The GHGRP has increased EPA’s understanding of the location and magnitude of significant methane emissions sources in the petroleum and natural gas industry, and in large part informed the Methane Challenge Program framework. The GHGRP rule complements, but does not replace, the information reported to EPA under this Methane Challenge Program ICR.

The information to be obtained under this ICR is not collected by EPA or any other Federal agency.

3(b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register on January 19, 2021 (86 FR 5186). Seven comments were received in response to the notice. The comments generally expressed support for the Natural Gas STAR and Methane Challenge Programs and the ICR renewal, including the proposal to merge the ICRs for Natural Gas STAR and Methane Challenge.

3(c) Consultations

Since the last ICR Renewal, information collection procedures for both Programs have remained largely the same. EPA consulted with the following Implementation Managers regarding the burden estimate for this information renewal request:

Natural Gas STAR and Methane Challenge ONE Future Partners:

Jim Tangeman
Kinder Morgan
370 Van Gordon St.
Lakewood, CO 80228
james_tangeman@kindermorgan.com
(303) 914-7788

Gregory Jones
Southern Company Gas
Ten Peachtree Place NE, 8th Floor
Atlanta, GA 30030
gjones@southernco.com
(404) 584-3722

Natural Gas STAR Partner:

Michael Sherman
Range Resources
300 North Second Street, Suite 901
Harrisburg, PA 17101
msherman@rangeresources.com
(724) 754-4002

Methane Challenge BMP Partner:

Margo Carr
South Jersey Gas
1001 South Grand Street
Hammonton, NJ 08037
mcarr@sjindustries.com
(609) 568-9028 x6769

The feedback from the Implementation Managers, in general, confirmed the burden estimates associated with preparation and submission of a partner's first Natural Gas STAR annual report and a Methane Challenge BMP partner's annual reports and participation in the Program were reasonable. Feedback indicated EPA's burden estimates associated with the preparation and submission of a partner's NGS annual report after its first year, as well as a Methane Challenge ONE Future partner's annual reports, were higher than what the company experienced. Accordingly, EPA has reduced the annual reporting burdens for these two scenarios in this ICR renewal.

3(d) Effects of Less Frequent Collection

The completion and submittal of the Partnership Agreement is a one-time activity for companies that voluntarily choose to become a Partner in the Natural Gas STAR Program. Partners agree to develop a company-specific approach for active participation in the Program and to submit annual reports if they wish to do so.

For Methane Challenge partners, the completion and submittal of the Partnership Agreement will be conducted once the Partner joins the Program and may be completed again if a Partner wishes to add commitments in the future. As part of Methane Challenge, Partners agree to also prepare and submit an Implementation Plan, to be revised upon achievement of a commitment or due to changes in operations. Partners agree to report annually while participating in this Program. The transparency of progress towards achieving commitments made by Partner companies provides a benefit to both the company and the public.

EPA believes that a reduction in the frequency of the information collection and submission of annual reporting data would impede efforts by EPA to evaluate results of the Program.

3(e) General Guidelines

None of these reporting or record keeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

3(f) Confidentiality

Participation in the Natural Gas STAR and Methane Challenge Programs is voluntary.

For the Natural Gas STAR Program: in the Partnership Agreement, the Program requests that Partners only share non-Confidential Business Information (CBI) to fulfill Gas STAR Program requirements.

For the Methane Challenge Program: it is clearly stated in Methane Challenge Program documents, such as the Partnership Agreement, that Partners are to only report non-confidential business information data relevant to achieving their Methane Challenge commitments. Some information collected in the Partnership Agreement and Implementation Plan forms may be considered Personally Identifiable Information (PII). Per the Privacy Act, and as stated in the Methane Challenge Program Framework

document, EPA will not share such information publicly. EPA will publicly release only non-confidential data on the EPA website that is submitted either through the Methane Challenge Program or through the GHGRP.

3(g) Sensitive Questions

No sensitive questions are asked in the Partnership Agreement, Implementation Plans, or the annual report forms for either Natural Gas STAR or Methane Challenge. As stated in the Partnership Agreements for both Programs, Partners agree to only share non-Confidential Business Information (CBI) to fulfill Program requirements and understand that information submitted to the Programs is subject to the Freedom of Information Act.

Regarding privacy of the information provided, any contact information for company representatives is used to identify the point of contact for implementation of the Natural Gas STAR and Methane Challenge Programs. Such information will only be used to communicate and coordinate with Partner companies about their participation, such as annual reporting, attending upcoming Program workshops, and progress on their Program commitments. However, some information may be made available to the public as required by the Freedom of Information Act, 5 U.S.C. § 552.

4 The Respondents and The Information Requested

4(a) Respondents/NAICS Codes

The following is a list of North American Industry Classification System (NAICS) Codes and associated industries that may be affected by information collection requirements covered under this ICR:

221210	Natural Gas Distribution
541100	Legal Services

4(b) Information Requested

EPA's Natural Gas STAR and Methane Challenge Programs specify requirements for partners. The following identifies the partnership forms contained in this ICR. A detailed justification for each reporting requirement immediately follows. Respondent burden estimates are summarized in Exhibit 1 through Exhibit 3.

Natural Gas STAR Program

Partnership Agreement

Companies that wish to become Natural Gas STAR Partners sign and submit a Partnership Agreement with EPA that describes the terms of participation in the Program. The Partnership Agreement identifies company points of contact and initiates participation in the Program. The form that will be covered under this ICR is:

- Natural Gas STAR Partnership Agreement: EPA Form No. 5900-105

(i) Data items:

Partners provide the following information in the Partnership Agreement:

- The name, title, address, telephone, and e-mail address of a Natural Gas STAR Program Implementation Manager.

- The name and signature of the partners' Authorized Company Representative.

(ii) Respondent activities:

In completing the Partnership Agreement, companies agree to perform the following activities:

- Download (from the Natural Gas STAR website) and review the Partnership Agreement;
- Gather requested information and complete the agreement; and
- Sign the agreement and submit it to EPA.

Annual Report

After one full year of participation in the Program, Partners can submit an optional annual report documenting the previous year's methane emission reduction activities. The report documents voluntary (i.e., non-regulatory driven) methane emission reduction activities that Partner companies have implemented in the previous year and corresponding methane emissions reductions achieved. Annual report data are entered on Excel-based reporting forms and are submitted by Partners to EPA through e-mail. The forms covered under this ICR include:

- Production Partners: EPA Form No. 5900-104
- Transmission Partners: EPA Form No. 5900-95
- Distribution Partners: EPA Form No. 5900-99
- Gathering and Processing Partners: EPA Form No. 5900-102

(i) Data items:

The annual report form requests the following information:

- General company information (e.g., company name, period covered by report, etc.);
- Annual report summary;
- Information on Best Management Practices implemented; and
- Information on additional Program accomplishments that a Partner wishes to share. This might include efforts to strengthen Program participation (e.g., training/education, innovative technologies or activities, pilot projects, employee incentive programs) and/or efforts to communicate participation (e.g., newsletters, press releases, external website).

(ii) Respondent activities:

Partners conduct the following activities in preparing their first annual report:

- Review the instructions for the initial report;
- Gather the requested information for the initial report;
- Complete the initial form(s); and
- Submit the initial report to EPA.

Partners conduct the following activities in preparing subsequent annual reports (i.e., after their first year in the Program):

- Prepare and submit a subsequent annual report.

Other Activities

EPA also tracks changes to partner's contact information (e.g., Implementation Manager's responsibility and updates to the mailing list) or changes in operating circumstances of a company. During participation in the Program, Partners agree to notify EPA within two weeks if there is a change to the Natural Gas STAR Program Implementation Manager or operating circumstances of a company. Partners will also identify ways the company intends to engage with the Program in years where they are not able to report methane emission reductions data to the Program.

(i) Data items:

As points of contact may change over time, Partner companies agree to provide EPA with updated contact information for the designated Implementation Manager for the Program and updates regarding the way the company intends to engage with Program.

(ii) Respondent activities:

- Notify EPA within two weeks of any change in Natural Gas STAR Implementation Manager.

Methane Challenge Program

Partnership Agreement

Methane Challenge Program Partners agree to sign and submit to EPA a Partnership Agreement that describes the terms of participation in the Program. This Partnership Agreement identifies company commitments and points of contact and initiates the partnership in the Program. The Partnership Agreement forms covered under this ICR include:

- Methane Challenge Program Partnership Agreement - Best Management Practice Commitment: EPA Form No. 5900-412; and
- Methane Challenge Program Partnership Agreement - ONE Future Commitment: EPA Form No. 5900-411.

(i) Data items:

Partners agree to provide the following information in the Partnership Agreement:

- The name, title, address, telephone number, and email address of a Methane Challenge Program Implementation Manager;
- BMP Commitment Partners: The segment(s), source(s), start date, achievement year, and any additional applicable commitment information specific to the emission source;
- ONE Future Commitment Partners: The segment(s), segment-specific target intensity, and target year; and
- The name and signature of the partners' Authorized Company Representative.

(ii) Respondent activities:

In completing the Partnership Agreement, Partners agree to perform the following activities:

- Download (from the Methane Challenge Program website) and review the Partnership Agreement;
- Gather requested information and complete the Partnership Agreement; and

- Sign the Partnership Agreement and submit it to EPA.

Implementation Plan

Partners agree to complete and submit a Methane Challenge Program Implementation Plan within six months of signing the Partnership Agreement. The Implementation Plan facilitates development of a strategy for a Partner company's planned participation, such as anticipated rate of progress, key milestones, and context for their Implementation Plans (e.g., referencing work to be done during the next planned shutdown of a facility). Partners can also include information on historic actions to reduce methane emissions that informs their Methane Challenge commitments. An Implementation Plan is a living document that can change over time as each partner's goals and commitments evolve. The plan can be updated at any time by emailing a new document to the Methane Challenge program managers at GasSTAR@epa.gov. EPA will accept requests from Partners for extension on the six-month timeline for submitting Implementation Plans. The Implementation Plan forms covered under this ICR include:

- Methane Challenge Program Implementation Plan Template: EPA Form No. 5900-410

(i) Data items:

The Implementation Plan form requests the following information:

- General company information (e.g., company name);
- Commitment(s) and projected timeframe for meeting commitments, as specified in the Partnership Agreement;
- Milestones and associated timeframes;
- Plans (if any) for future expansion of Methane Challenge commitments; and,
- Any other relevant information to provide context for the Partner's participation (e.g., background on progress the Partner company has already made on methane mitigation, including past actions and results on reducing emissions from target sources).

(ii) Respondent activities:

Partners agree to conduct the following activities in preparing the Implementation Plan:

- Review the instructions;
- Gather the requested information and develop the Implementation Plan;
- Complete the form;
- Submit the plan to EPA; and
- Update the plan as goals and commitments change over time. The Plan is revised or updated by submitting a new form to EPA.

Annual Reporting

Annual reporting is a key element for Partners in the Methane Challenge Program. After one full calendar year of participation in the Program, Partners agree to submit a specific set of data documenting the previous year's methane emissions, activity data, and reduction activities. The report documents voluntary (non-regulatory driven) methane emission reduction activities that Partner companies have implemented in the previous year. The Program defines the reporting requirements in its Best Management Practice and ONE Future Technical Documents which accompany this statement.

These reporting requirements are translated into Excel format and programmed into the e-GGRT system. The annual reporting forms covered under this ICR are:

- Best Management Practice Commitment Option Reporting Form: EPA Form No. 5900-434
- ONE Future Commitment Option Reporting Form: EPA Form No. 5900-435

(i) Data items:

The annual reporting forms request the following information:

- General company and facility information (e.g., company name, facility name and ID number, reporting year, etc.) and
- Specific data elements for the applicable company commitment, as defined in the Methane Challenge BMP and OF Technical Documents.

Annual reports will also provide an opportunity for reporting optional, qualitative information to provide context for commitment progress each year.

(ii) Respondent activities:

Partners agree to conduct the following activities in preparing the annual report:

- Review the instructions and complete registration in e-GGRT;
- Gather the requested information;
- Prepare, sign, and submit the report to EPA electronically.

Historical Actions Fact Sheet

Methane Challenge Partners are given an opportunity to submit a Historical Actions Fact Sheet, which provides information on historical methane reduction actions taken prior to joining Methane Challenge. A two-page fact sheet template is made available to Partner companies and allows entry of up to five key methane mitigation activities, including text, photos, and graphics. This document is not a core element of the Methane Challenge Program partnership and is considered optional. The fact sheet form covered under this ICR is:

- Historical Actions Fact Sheet Template: EPA Form No. 5900-413

(i) Data items:

Partners that choose to submit Historical Actions Fact Sheets may provide descriptions of up to five methane mitigation activities, which can include background information on actions taken, a timeframe and any significant outcomes of actions, relevant technologies and/or practices employed that resulted in reduced emissions, methane emission reductions achieved, links to more information, etc. There is also a section on the form dedicated to providing relevant company-specific background and contextual information (e.g. general company information, overview of historical activities, overarching corporate policies, links to more information on company website, etc.).

(ii) Respondent activities (if Partner chooses to submit this document):

- Review the instructions;
- Gather information

- Complete the Historical Actions Fact Sheet using the provided template; and
- Submit the fact sheet to EPA via email.

Other Activities

During participation in the Program, Partners are requested to notify EPA program managers via the GasSTAR@epa.gov email address within two weeks if there is a change to the Methane Challenge Program Implementation Manager responsibility.

(i) Data items:

Partners with changes to the Methane Challenge Program Implementation Manager are requested to provide EPA with the name of the new contact and relevant contact information.

(ii) Respondent activities:

- Notify EPA within two weeks of any change in Implementation Manager.

Service Provider Directory

As a service to partners, EPA maintains a “service provider directory” to share information on services and technologies available to oil and natural gas companies seeking to reduce methane emissions from their operations. EPA does not endorse any company or product in the directory. Contact information is provided to foster the exchange of information.

(i) Data items:

Third-party vendors (service providers) complete an on-line form providing contact information and a short description of their technology, product, or service to be added to the directory listing.

(ii) Respondent activities:

- Complete the form.

5 The Information Collected-Agency Activities, Collection Methodology, And Information Management

5(a) Agency Activities

The Natural Gas STAR and Methane Challenge Programs perform various activities after a Partner submits a Partnership Agreement, Implementation Plan, or annual report.

Natural Gas STAR Program

Partnership Agreement

EPA performs the following activities upon receipt of a Partnership Agreement:

- Review the agreement to ensure completeness and accuracy, and conduct follow up, if necessary;
- Countersign the agreement;
- Develop a cover letter with relevant Program information;
- Email cover letter and countersigned agreement to partner;
- Enter agreement information into tracking database.

Annual Report

EPA performs the following activities upon receipt of an annual report:

- Review the report to ensure completeness and accuracy, and conduct follow-up, if necessary.

Additional Activities

EPA performs the following activities upon receipt of updated company information:

- Enter updated information into database.

Methane Challenge Program

Partnership Agreement

EPA performs the following activities upon receipt of a Partnership Agreement:

- Review the Partnership Agreement to ensure completeness and accuracy, and conduct follow-up, if necessary;
- Countersign the Partnership Agreement;
- Develop a cover letter with relevant Program information;
- Send cover letter and countersigned Partnership Agreement to partner;
- Enter Partnership Agreement information into tracking database.

Implementation Plan

EPA performs the following activities upon receipt of an Implementation Plan:

- Review the plan to ensure completeness and accuracy, and conduct follow-up, if necessary;
- Enter information into a tracking database.

Annual Report

EPA performs the following activities upon receipt of an Annual Report:

- Review the report to ensure completeness and accuracy, and conduct follow-up, if necessary.

Historical Actions Fact Sheet

EPA performs the following activities upon receipt of a Historical Actions Fact Sheet:

- Review the document and follow up, if necessary;
- File electronic copy of the fact sheet.

Additional Activities

EPA performs the following activities upon receipt of updated Implementation Manager information:

- Enter information into a tracking database.

Service Provider Directory

EPA performs the following activities upon receipt of a service provider directory form:

- Review form and enter data in database.

Regarding privacy of the information provided, any contact information for company representatives is used to identify the point of contact for implementation of the Natural Gas STAR. Such information will only be used to communicate and coordinate with Partner companies about their participation in the

Natural Gas STAR Program, such as annual reporting, attending upcoming Program workshops, and progress on their Program commitments. However, some information may be made available to the public as required by the Freedom of Information Act, 5 U.S.C. § 552.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses typical office equipment such as telephones, computers, and database and word processing software systems.

The Natural Gas STAR Program Partnership Agreement is available on the Program website in PDF format. Partners complete annual reporting spreadsheets that are submitted to EPA electronically via e-mail.

The Methane Challenge Program has developed various templates and tools to assist partners. The Methane Challenge Program Partnership Agreements (PDF), Historical Actions Fact Sheet (PowerPoint), Implementation Plan (PDF), and sample reporting forms (MS Excel) are available on the Program website. Partners must download and submit facility-specific Methane Challenge reporting forms to EPA electronically through the Electronic Greenhouse Gas Reporting Tool (“e-GGRT”).

EPA ensures the accuracy and completeness of collected information by reviewing each submission. EPA uses the information obtained from the Partnership Agreements, Implementation Plans, and annual reports to track partners’ progress in achieving their commitments and in reducing methane emissions.

5(c) Small Entity Flexibility

EPA has designed and streamlined its Program forms to minimize respondent burden while obtaining sufficient and accurate information; the estimated burden cannot be further reduced for small entities. It should be noted that the estimated burden associated with either of the Natural Gas STAR and Methane Challenge Programs is reduced over the course of a partner’s participation based on the familiarity of the process that Partners gain over time.

5(d) Collection Schedule

For the Natural Gas STAR Program, EPA collects initial Partner information in the Partnership Agreement, which is completed and submitted by each Partner upon their decision to participate in the Program. Each spring, EPA collects information in the annual report to monitor methane emissions reductions progress. EPA may also collect other Program information on a periodic basis, such as notification of a change in Implementation Manager or changes in the operating circumstances of a company (change in ownership, assets, etc.).

For the Methane Challenge Program, EPA collects initial Partner information in the Partnership Agreement, which is completed and submitted by each Partner upon their decision to participate in the Program. The Implementation Plan is submitted by Partners within six months of signing the Partnership Agreement. Each year, EPA collects information in the annual reporting forms to monitor Partner progress in achieving their commitments. EPA may also collect other Program information as the information is submitted, such as notification of a change in Implementation Manager, changes to a partner’s operating circumstances (change in ownership, assets, etc.), or an optional Historical Actions Fact Sheet.

6 Estimating the Burden and Cost of The Collection

6(a) Estimating Respondent Burden

Methane Challenge BMP Commitment Partners

The average annual burden for information collection requirements associated with this ICR is estimated to be 49 hours per Methane Challenge BMP respondent (3,432 / 70 [the average number of Partners during the 3-year ICR period]).

For new partners, the average reporting burden per Partner for information collection requirements associated with completing the Partnership Agreement is estimated to be 10 hours. The burden estimate includes time to download and review the Partnership Agreement; gather information and fill out the Partnership Agreement; and sign and submit the Partnership Agreement to EPA.

The average reporting burden per Partner for information collection requirements associated with completing the optional Historical Actions Fact Sheet is 14 hours. The burden estimate includes time to review instructions; gather information and fill out the fact sheet template; and submit the fact sheet to EPA.

The average reporting burden per Partner for information collection requirements associated with completing and periodically updating the Implementation Plan is estimated to be 37 hours. The burden estimate includes time to review the plan form; gather the requested information; complete the plan; and submit to EPA.

The average per Partner reporting burden for information collection requirements associated with completing the annual report is estimated to be 50 hours. The burden estimate includes time to review the reporting instructions and complete registration in e-GGRT; gather the requested information; and prepare, sign, and submit the report to EPA.

For BMP Commitment partners, the average per Partner reporting burden for information collection requirements associated with additional activities is estimated to be 0.5 hours. The reporting burden includes time to notify EPA of changes in Methane Challenge Implementation Manager responsibility.

Methane Challenge ONE Future Partners

The average annual burden for information collection requirements associated with this ICR is estimated to be 50 hours per Methane Challenge ONE Future respondent (302 / 6 [the average number of Partners during the 3-year ICR period])

For new partners, the average reporting burden per Partner for information collection requirements associated with completing the Partnership Agreement is estimated to be 10 hours. The burden estimate includes time to download and review the Partnership Agreement; gather information and fill out the Partnership Agreement; and sign and submit the Partnership Agreement to EPA.

The average reporting burden per Partner for information collection requirements associated with completing the optional Historical Actions Fact Sheet is 14 hours. The burden estimate includes time to review instructions; gather information and fill out the fact sheet template; and submit the fact sheet to EPA.

The average reporting burden per Partner for information collection requirements associated with completing and periodically updating the Implementation Plan is estimated to be 37 hours. The burden estimate includes time to review the plan form; gather the requested information; complete the plan; and submit to EPA.

The average per Partner reporting burden for information collection requirements associated with completing the annual report is estimated to be 60 hours. The burden estimate includes time to review the reporting instructions and complete registration in e-GGRT; gather the requested information; and prepare, sign, and submit the report to EPA.

For ONE Future Commitment partners, the average per Partner reporting burden for information collection requirements associated with additional activities is estimated to be 0.5 hours. The reporting burden includes time to notify EPA of changes in Methane Challenge Implementation Manager responsibility.

Natural Gas STAR Partners

The average annual burden for information collection requirements associated with this ICR is estimated to be 21 hours per Natural Gas STAR respondent (1,124 / 54 [the average number of Partners during the 3-year ICR period]).

For new partners, the average reporting burden per Partner for information collection requirements associated with completing the Partnership Agreement is estimated to be 10 hours. The burden estimate includes time to download and review the agreement; gather information and fill out the agreement; and sign and submit the agreement to EPA.

The average per Partner reporting burden for information collection requirements associated with completing the initial annual report is estimated to be 51 hours. The average per Partner reporting burden for information collection requirements associated with completing subsequent annual reports is estimated to be 20 hours. The burden estimate includes time to review the reporting package (forms and any Program updates); gather the requested information; complete the form; and submit the form to EPA.

For Natural Gas STAR partners, the average per Partner reporting burden for information collection requirements associated with additional activities is estimated to be 0.5 hours. The reporting burden includes time to notify EPA of changes in Natural Gas STAR Program Implementation Manager or changes in the operating circumstances of a company.

Service Providers

For vendors completing the Service Provider Directory form, the average annual burden is estimated to be 0.25 hours (3 / 10).

Exhibit 1 and Exhibit 2 present the estimated annual respondent burden for information collection activities associated with this ICR for the Methane Challenge Program BMP and ONE Future Commitments, respectively. Exhibit 3 presents the estimated annual respondent burden for information collection activities associated with this ICR for the Natural Gas STAR Program, including submissions to the service provider directory.

The activities a Partner implements in its first year will be different from those it implements in subsequent years. For Methane Challenge, a Partner will submit its Partnership Agreement, Implementation Plan, and optional Historical Actions Fact Sheet in its first year. In subsequent years it will submit an annual report and possibly submit updated implementation manager information. For Natural Gas STAR, a Partner will submit its Partnership Agreement and its initial annual report in its first year. In subsequent years it will submit an annual report and possibly submit updated implementation manager information. Table 1 presents the estimated annual burden for a single respondent, depending on which year of participation they are in (i.e., if it is their first year in the Program, or a subsequent year).

Table 1: Average Annual Burden for a Partner, by Year of Participation

	Respondent Annual Burden Hours First Year	Respondent Annual Burden Hours Subsequent Years
Methane Challenge BMP Partner	61	50.5
Methane Challenge ONE Future Partner	61	60.5
Natural Gas STAR Partner	61	20.5

6(b) Estimating Respondent Costs

Exhibit 1 and Exhibit 2 present the estimated annual respondent cost for information collection activities associated with this ICR for the Methane Challenge Program BMP and ONE Future Commitments, respectively. Exhibit 3 presents the estimated annual respondent cost for information collection activities associated with this ICR for the Natural Gas STAR Program, including submissions to the service provider directory. As explained in Section 6(a), the activities a Partner implements in its first year will be different from those it implements in subsequent years. Table 2 presents the estimated annual cost for a single respondent, depending on which year of participation they are in (i.e., if it is their first year in the Program, or a subsequent year).

Table 2: Average Annual Cost for a Partner, by Year of Participation

	Respondent Annual Cost First Year	Respondent Annual Cost Subsequent Years
Methane Challenge BMP Partner	\$ 5,922	\$ 4,847
Methane Challenge ONE Future Partner	\$ 5,922	\$ 5,469
Natural Gas STAR Partner	\$ 5,917	\$ 2,388

6(b)(i) Estimating Labor Costs

EPA used a national average hourly labor rate including an hourly rate plus 60% overhead of \$115.70 for legal staff, \$111.79 for managerial staff, \$87.95 for technical staff, and \$46.91 for clerical staff. Legal, managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for NAICS Code 541100 and 221200. Legal rates were based on lawyers, management wages were based on general and operations managers, technical wages were based on health and safety engineers, and clerical rates were based on general office and administrative support occupations.

6(b)(ii) Estimating Capital and Operations and Maintenance Costs

EPA consulted with members of the oil and gas industry about capital and operations and maintenance costs under previous ICR renewals and believes that the capital or operations and maintenance costs of these Programs are minimal. All Methane Challenge and Natural Gas STAR Partners submit Partnership Agreements via e-mail as scanned PDFs or other electronic format. All Methane Challenge Partners submit Historical Action Fact Sheets and Implementation Plans via e-mail as scanned PDFs or other electronic format. All Methane Challenge Partners use the e-GRRT online reporting system to submit Annual Reports. All Natural Gas STAR Partners submit Annual Reports via e-mail. All Service Provider Directory entrants submit information via electronic form on EPA's website.

6(b)(iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs

There are no capital/start-up costs or O&M costs associated with this information collection.

6(b)(iv) Annualizing Capital Costs

There are no capital costs associated with this information collection.

6(c) Estimating Agency Burden and Costs

Exhibit 4 presents the estimated Agency burden hours and costs for the information collection activities associated with this ICR for the Methane Challenge Program. Exhibit 5 presents the estimated annual Agency burden hours and costs for information collection activities associated with this ICR for the Natural Gas STAR Program. EPA estimates an average hourly labor cost (labor plus overhead) of \$110.50 for legal staff, \$103.33 for managerial staff, \$75.76 for technical staff, and \$30.42 for clerical staff. To derive these estimates, EPA used the "Hourly Salary Table 2021 - GS" from the Office of Personnel Management. For purposes of this ICR, EPA assigned staff the following government service levels:

Legal Staff	GS-15, Step 1
Managerial Staff	GS-14, Step 4
Technical Staff	GS-12, Step 5
Clerical Staff	GS-05, Step 1

To derive the loaded hourly estimates, EPA multiplied hourly rates by the standard government overhead factor of 1.6.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Methane Challenge Program

BMP Commitment

As of January 2021, there were 64 BMP commitment option Partners nationally; the majority of these Partners are distribution companies. EPA anticipates that an average of three new Partners will commit to this option annually.

We assume the following number of new BMP Partners joining the Program in the next 3 years:

Table 3: Estimated Number of Program Partners for the Methane Challenge BMP Commitment

Type of Partner	2021	2022	2023	Average
New Partners	3	3	3	3
Total BMP Partners	67	70	73	70

This averages out to 3 new BMP Partners each year over the 3-year period of the ICR. New Partners complete Partnership Agreements, Implementation Plans, and optional Historical Action Fact Sheets in their first year in the Program. EPA thus assumes an average of 3 responses for each of these components in the average annual cost and burden estimates in Exhibit 1.

ONE Future Commitment

As of January 2021, there were four ONE Future Commitment option Partners nationally. EPA anticipates that an average of one new Partner will commit to this option annually.

We assume the following number of new ONE Future Partners joining the Program in the next 3 years:

Table 4: Estimated Number of Program Partners for the Methane Challenge ONE Future Commitment

Type of Partner	2021	2022	2023	Average
New Partners	1	1	1	1
Total OF Partners	5	6	7	6

This averages out to one new ONE Future Partner each year over the 3-year period of the ICR. New Partners complete Partnership Agreements, Implementation Plans, and optional Historical Action Fact Sheets in their first year in the Program. EPA thus assumes an average of one response for each of these components in the average annual cost and burden estimates in Exhibit 2.

Partnership Agreement

Each prospective Methane Challenge Partner agrees to complete and submit a Partnership Agreement (PA) to join the Program. The expected number of Partners that will join Methane Challenge each year and an average per year is shown in Table 3 and Table 4.

BMP Commitment

Over the course of this ICR, EPA expects that 9 (an average of 3 per year) new Partners will complete and submit a Partnership Agreement for the BMP Commitment.

ONE Future Commitment

Over the course of this ICR, EPA expects that 3 (an average of 1 per year) new Partners will complete and submit a Partnership Agreement for the ONE Future Commitment.

Historical Actions Fact Sheet

All new Partners are given the option to complete and submit a Historical Actions Fact Sheet.

BMP Commitment

Over the course of this ICR, EPA estimates that 3 (an average of 1 per year) BMP Commitment Partners will submit a Historical Actions Fact Sheet.

ONE Future Commitment

Over the course of this ICR, EPA estimates that 3 (an average of 1 per year) ONE Future Commitment Partners will submit a Historical Actions Fact Sheet.

Implementation Plan

All new Partners agree to complete and submit an Implementation Plan within six months of signing and submitting the Partnership Agreement.

BMP Commitment

Over the course of this ICR, EPA estimates that 9 (an average of 3 per year) BMP Commitment Partners will submit an Implementation Plan. Further, over the course of this ICR, EPA estimates that 15 (an average of 5 per year) BMP Partners will update an Implementation Plan.

ONE Future Commitment

Over the course of this ICR, EPA estimates that 3 (an average of 1 per year) ONE Future Commitment Partners will submit an Implementation Plan. Further, over the course of this ICR, EPA estimates that three (an average of one per year) ONE Future Commitment Partners will update an Implementation Plan.

Annual Report

All Partners agree to compile and submit data after the first full (calendar) year of joining the Program, and annually in the subsequent years of participation. That is, Partners joining in 2021 will not start reporting until 2023. Partners joining in 2022 or 2023 will not start reporting until the next ICR.

BMP Commitment Partners

EPA expects that 64 Partners will review the instructions for annual reporting and complete, sign and submit annual reports in 2021 and 2022.

EPA expects that approximately 67 Partners will review the instructions for annual reporting and complete, sign and submit annual reports in 2023 to include 3 Partners reporting for the first time.

EPA thus expects that an average of 65 BMP annual reports will be received per year over the course of this ICR (i.e., the average of 64, 64, and 67).

ONE Future Commitment Partners

Over the course of this ICR, EPA estimates that 4 Partners will review the instructions for annual reporting and complete, sign and submit annual reports in 2021 and 2022, and 5 Partners will review the instructions for annual reporting and complete, sign and submit annual reports in 2023 to include 1 Partner reporting for the first time.

EPA thus expects that an average of 4 OF reports will be received per year over the course of this ICR (i.e., the average of 4, 4, and 5).

Additional Activities

Partners are requested to notify EPA of changes in Implementation Manager responsibilities or relevant administrative information each year. EPA estimates that approximately 5 Partners will experience changes in their Implementation Manager responsibilities each year.

BMP Commitment

Over the course of this ICR, EPA estimates that approximately 5 BMP Commitment Partners will notify EPA of changes in Implementation Manager responsibilities or relevant administrative information each year.

ONE Future Commitment

Over the course of this ICR, EPA estimates that 1 ONE Future Commitment Partner will notify EPA of changes in Implementation Manager responsibilities or relevant administrative information each year.

Natural Gas STAR Program

As of January 2021, there are 52 reporting Natural Gas STAR Program partners. These oil and natural gas firms are a mix of large and relatively small companies. Based on recent trends, EPA anticipates an average of one company will join the Program annually. This number is expected to remain constant or potentially fall as more companies join the Methane Challenge Program.

The average annual cost and burden estimates during the next 3-year ICR period are based on the average number of Partners as shown in Table 5.

Table 5: Estimated Number of Program Partners for the Natural Gas STAR Program

Type of Partner	2021	2022	2023	Average
New Partners	1	1	1	1
Total NGS Partners	53	54	55	54

Partnership Agreement

Each Partner completes and submits a Partnership Agreement to join the Program. EPA anticipates that 1 new Partner will complete and submit an agreement each year.

Annual Report

Natural Gas STAR Partners may complete and submit an annual report after one full (calendar) year of joining the Program, and annually in subsequent years. The activities associated with submitting a partner's initial NGS report are: review instructions for the initial report; gather the requested information for the initial report; complete the initial form(s); submit the initial report to EPA. The activity associated with submitting subsequent annual reports for established Partners is prepare and submit a subsequent annual report.

EPA estimates that 1 new Partner will submit an "initial report" during each year covered by this ICR, and that 52, 53, and 54 established Partners will submit "subsequent annual reports" in 2021, 2022, and 2023, respectively.

EPA thus expects that an average of 1 "initial report" and 53 "subsequent annual reports" will be received per year over the course of this ICR.

Additional Activities

EPA estimates that approximately 5 Natural Gas STAR Partners experience changes in their Implementation Manager each year or changes in the operating circumstances of the company. Thus, EPA estimates that 5 Partners will notify EPA of such changes.

Service Provider Directory

EPA estimates that each year 10 companies will complete the on-line form to promote the services and technologies they provide to oil and natural gas companies seeking to reduce methane emissions from their operations.

Exhibit 1. Estimated Annual Respondent Burden and Cost for Methane Challenge – BMP Option

INFORMATION COLLECTION ACTIVITY	Leg. \$ 115.70/ Hour	Mgr. \$ 111.79/ Hour	Tech. \$ 87.95/ Hour	Cler. \$ 46.91/ Hour	Respond. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost ¹	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year	Hours and Costs Per Respondent/Activity		Total Hours and Costs
												Annual Report	Historical Fact Sheet	Total Hours and Costs
Partnership Agreement (PA)														
Receive and review the PA	1	3	0	0	4	\$ 451	\$0	\$0	3	12	\$ 1,353			
Gather information and fill out PA data sheet	1	3	0	1	5	\$ 498	\$0	\$0	3	15	\$ 1,494			
Sign and submit PA to EPA	0	0.5	0	0.5	1	\$ 79	\$0	\$0	3	3	\$ 238			
SUBTOTAL					10					30	\$ 3,085			
Historical Fact Sheet														
Review instructions	0	0.5	1	0	1.5	\$ 144	\$0	\$0	1	1.5	\$ 144			
Gather information	0	2	6	0	8	\$ 751	\$0	\$0	1	8	\$ 751			
Complete fact sheet template	0	1	2	1	4	\$ 335	\$0	\$0	1	4	\$ 335			
Submit fact sheet to EPA	0	0.5	0	0	0.5	\$ 56	\$0	\$0	1	0.5	\$ 56			
SUBTOTAL					14					14	\$ 1,286			
Implementation Plan (IP)														
Review instructions	0	2	0	0	2	\$ 224	\$0	\$0	3	6	\$ 671			
Gather information and develop the IP	0	10	10	0	20	\$ 1,997	\$0	\$0	3	60	\$ 5,992			
Complete the form(s)	0	1	0	1	2	\$ 159	\$0	\$0	3	6	\$ 476			
Sign and submit plan to EPA	0	0.5	0	0.5	1	\$ 79	\$0	\$0	3	3	\$ 238			
Update IP, as necessary and submit to EPA	0	6.5	4	1.5	12	\$ 1,149	\$0	\$0	5	60	\$ 5,744			
SUBTOTAL					37					135	\$ 13,121			
Annual Report														
Review instructions and complete registration in e-GGRT	0	10	0	0	10	\$ 1,118	\$0	\$0	65	650	\$ 72,665			
Gather the requested information	0	10	18	1	29	\$ 2,748	\$0	\$0	65	1885	\$ 178,618			
Prepare, sign, and submit the report to EPA	0	1.5	8	1.5	11	\$ 942	\$0	\$0	65	715	\$ 61,209			
SUBTOTAL					50					3,250	\$ 312,491			
Additional Activities														
Notify EPA within two weeks of any change in Methane Challenge Implementation Manager	0	0.25	0	0.25	0.5	\$ 40	\$0	\$0	5	2.5	\$ 198			
SUBTOTAL					0.5					2.5	\$ 198			
TOTAL										3,431.5	\$330,182			

All costs have been rounded to the nearest dollar

¹ EPA did not include O&M costs for postage for respondents. Methane Challenge Partners will use the e-GGRT online reporting system to submit Annual Reports. Also, Partners submit PAs, Historical Fact Sheets, and Implementation Plans via e-mail as scanned PDFs or some other type of electronic format. Therefore, costs associated with postage are negligible.

Exhibit 2. Estimated Annual Respondent Burden and Cost for Methane Challenge – ONE Future Option

INFORMATION COLLECTION ACTIVITY	Leg. \$ 115.70/ Hour	Mgr. \$ 111.79/ Hour	Tech. \$ 87.95/ Hour	Cler. \$ 46.91/ Hour	Respond. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost ¹	Respond. or Activities	Total Hours and Costs	
										Number of Total Hours/ Year	Total Cost/ Year
Partnership Agreement (PA)											
Receive and review the PA	1	3	0	0	4	\$ 451	\$0	\$0	1	4	\$ 451
Gather information and complete PA	1	3	0	1	5	\$ 498	\$0	\$0	1	5	\$ 498
Sign and submit PA to EPA	0	0.5	0	0.5	1	\$ 79	\$0	\$0	1	1	\$ 79
SUBTOTAL					10					10	\$ 1,028
Historical Fact Sheet											
Review instructions	0	0.5	1	0	1.5	\$ 144	\$0	\$0	1	1.5	\$ 144
Gather information	0	2	6	0	8	\$ 751	\$0	\$0	1	8	\$ 751
Complete fact sheet template	0	1	2	1	4	\$ 335	\$0	\$0	1	4	\$ 335
Submit fact sheet to EPA	0	0.5	0	0	0.5	\$ 56	\$0	\$0	1	0.5	\$ 56
SUBTOTAL					14					14	\$ 1,286
Implementation Plan (IP)											
Review instructions	0	2	0	0	2	\$ 224	\$0	\$0	1	2	\$ 224
Gather information and develop the IP	0	10	10	0	20	\$ 1,997	\$0	\$0	1	20	\$ 1,997
Complete the form(s)	0	1	0	1	2	\$ 159	\$0	\$0	1	2	\$ 159
Submit plan to EPA	0	0.5	0	0.5	1	\$ 79	\$0	\$0	1	1	\$ 79
Update IP, as necessary and Submit to EPA	0	6.5	4	1.5	12	\$ 1,149	\$0	\$0	1	12	\$ 1,149
SUBTOTAL					37					37	\$ 3,608
Annual Report											
Review instructions and complete registration in e-											
GRT	0	2	2	0	4	\$ 399	\$0	\$0	4	16	\$1,598
Gather the requested information	0	10	30	2	42	\$ 3,850	\$0	\$0	4	168	\$15,401
Prepare, sign, and submit the report to EPA	0	3	8	3	14	\$ 1,180	\$0	\$0	4	56	\$4,719
SUBTOTAL					60					240	\$21,718
Additional Activities											
Notify EPA within two weeks of any change in Methane Challenge Implementation Manager	0	0.25	0	0.25	0.5	\$ 40	\$0	\$0	1	0.5	\$40
SUBTOTAL					0.5					0.5	\$40
TOTAL										301.5	\$27,680

All costs have been rounded to the nearest dollar

¹ EPA did not include O&M costs for postage for respondents. Methane Challenge Partners will use the e-GRRt online reporting system to submit Annual Reports. Also, Partners submit PAs, Historical Fact Sheets, and Implementation Plans via e-mail as scanned PDFs or some other type of electronic format. Therefore, costs associated with postage are negligible.

Exhibit 3. Estimated Annual Respondent Burden and Cost for Natural Gas STAR Program

INFORMATION COLLECTION ACTIVITY	Leg. Hour	Mgr. Hour	Tech. Hour	Cler. Hour	Respon. Hours/Activity	Labor Cost/Activity	Capital/Startup Cost	O & M Cost ¹	Respon. or Activities	Number of Total Hours/Year	Total Hours and Costs	
											Total Cost/Year	
Partnership Agreement (PA)												
Download and review the PA	1	3	0	0	4	\$ 451	\$0	\$0	1	4	\$ 451	
Gather information and fill out PA	1	3	0	1	5	\$ 498	\$0	\$0	1	5	\$ 498	
Sign and submit PA to EPA	0	0.5	0	0.5	1	\$ 79	\$0	\$0	1	1	\$ 79	
SUBTOTAL										10	\$ 1,028	
Annual Report												
Review instructions for the initial report	0	5	0	0	5	\$ 559	\$0	\$0	1	5	\$ 559	
Gather the requested information for the initial report	0	10	30	0	40	\$ 3,756	\$0	\$0	1	40	\$ 3,756	
Complete the initial form(s)	0	4	0	1	5	\$ 494	\$0	\$0	1	5	\$ 494	
Submit the initial report to EPA	0	0.5	0	0.5	1	\$ 79	\$0	\$0	1	1	\$ 79	
Prepare and submit a subsequent Annual Report	0	8	16	1	20	\$ 2,348	\$0	\$0	53	1060	\$ 124,469	
SUBTOTAL										1,111	\$ 129,358	
Additional Activities												
Notify EPA within two weeks of any change in Natural Gas Star Implementation Manager	0	0.25	0	0.25	0.5	\$ 40	\$0	\$0	5	2.5	\$ 198	
SUBTOTAL										2.5	\$ 198	
TOTAL Partner Activities												
										1,123.5	\$ 130,585	
Service Provider Directory Requests												
Complete the form	0	0.25	0	0	0.25	\$ 28	\$0	\$0	10	2.5	\$ 2798	
TOTAL Service Provider Activities										2.5	\$ 279	

All costs have been rounded to the nearest dollar

¹ EPA did not include O&M costs for postage for respondents. Natural Gas STAR Partners submit PAs via e-mail as scanned PDFs or some other type of electronic format and submit annual reports via e-mail as Excel file. Service Providers submit directory requests via webform on EPA's website. Therefore, costs associated with postage are negligible.

Exhibit 4. Estimated Annual Agency Burden and Cost for Methane Challenge (Both Commitment Options)

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent/Activity										Total Hours and Costs	
	Leg. \$110.5/ Hour	Mgr. \$103.33/ Hour	Tech. \$75.76/ Hour	Cler. \$30.42/ Hour	Agency Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year	
Partnership Agreement (PA)												
Review PA and follow up, if necessary	0	0	1	0	1	\$ 76	\$0	\$0	4	4	\$ 303	
Sign the PA	0	0.05	0	0	0.05	\$ 5	\$0	\$0	4	0.2	\$ 21	
Prepare a cover letter	0	0	0	0.1	0.1	\$ 3	\$0	\$0	4	0.4	\$ 12	
Email cover letter and signed PA to partner	0	0	0	0.1	0.1	\$ 3	\$0	\$0	4	0.4	\$ 12	
Enter information into database	0	0	0	0.25	0.25	\$ 8	\$0	\$0	4	1	\$ 30	
SUBTOTAL					1.5	\$ 114	\$0	\$0	2	3	\$ 227	
Historical Fact Sheet												
Review fact sheet and follow up, if necessary	0	0	1.5	0	1.5	\$ 8	\$0	\$0	2	0.5	\$ 15	
Enter information into database	0	0	0	0.25	0.25	\$ 8	\$0	\$0	2	0.5	\$ 15	
SUBTOTAL					1.75	\$ 16	\$0	\$0	4	1	\$ 30	
Implementation Plan												
Review plan and follow up, if necessary	0	0	2	0	2	\$ 152	\$0	\$0	10	20	\$ 1,515	
Enter information into database	0	0	0	0.25	0.25	\$ 8	\$0	\$0	10	2.5	\$ 76	
SUBTOTAL					2.25	\$ 160	\$0	\$0	20	22.5	\$ 1,591	
Annual Report												
Review report and follow up, if necessary	0	0	4	0	4	\$ 303	\$0	\$0	69	276	\$ 20,910	
SUBTOTAL					4	\$ 303	\$0	\$0	69	276	\$ 20,910	
Additional Activities												
Enter updated information into database	0	0	0	0.25	0.25	\$ 8	\$0	\$0	6	1.50	\$ 46	
SUBTOTAL					0.25	\$ 8	\$0	\$0	6	1.50	\$ 46	
TOTAL						310					\$ 23,168	

All costs have been rounded to the nearest dollar

Exhibit 5. Estimated Annual Agency Burden and Cost for Natural Gas STAR

INFORMATION COLLECTION ACTIVITY	Hours and Costs for Agency Per Activity										Total Hours and Costs	
	Leg. \$110.5/ Hour	Mgr. \$103.33/ Hour	Tech. \$75.76/ Hour	Cler. \$30.42/ Hour	Agency Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year	
Partnership Agreement (PA)												
Review PA and follow up, if necessary	0	0	1	0	1	\$ 76	\$0	\$0	1	1	\$ 76	
Sign the agreement	0	0.05	0	0	0.05	\$ 5	\$0	\$0	1	0.05	\$ 5	
Prepare a cover letter	0	0	0	0.1	0.1	\$ 3	\$0	\$0	1	0.1	\$ 3	
Email cover letter and signed PA partner	0	0	0	0.1	0.1	\$ 3	\$0	\$0	1	0.1	\$ 3	
Enter agreement information into a data base	0	0	0	0.25	0.25	\$ 8	\$0	\$0	1	0.25	\$ 8	
SUBTOTAL										1.5	\$ 95	
Annual Report												
Review report and follow up, if necessary	0	0	2	0	2	\$ 152	\$0	\$0	53	106	\$ 8,031	
SUBTOTAL										106	\$ 8,031	
Additional Activities												
Enter updated information into database	0	0	0	0.25	0.25	\$ 8	\$0	\$0	5	1.25	\$ 38	
SUBTOTAL										1.25	\$ 38	
Service Provider Directory Requests												
Review forms and enter data in database	0	0	0.5	0	0.5	\$ 38	\$0	\$0	10	5	\$ 379	
SUBTOTAL										5	\$ 379	
TOTAL										113.75	\$ 8,542	

All costs have been rounded to the nearest dollar

6(e) Bottom Line Burden Hours and Costs

Exhibit 1, Exhibit 2, and Exhibit 3 show the aggregate annual burden and cost to Methane Challenge BMP, ONE Future, and Natural Gas STAR respondents, respectively, and Exhibit 4 and Exhibit 5 show the aggregate annual burden and cost to the government for the information collection activities covered under this ICR for the Methane Challenge Program and the Natural Gas STAR Program, respectively.

6(e)(i) Respondent Tally

EPA estimates an annual respondent burden of 4,859 hours, equivalent to \$488,726, across both the Methane Challenge and Natural Gas STAR Programs. Over the three-year period covered by this ICR, EPA estimates the burden of the Programs to be 14,577 hours, equivalent to \$1,466,179. EPA projects a total of 140 respondents by the third year of this ICR. Note that throughout this section, EPA will provide burden hour estimates rounded to the nearest hour and cost estimates rounded to the nearest dollar.

Methane Challenge BMP Commitment Partners

The total burden for BMP Commitment respondents is approximately 3,431.5 hours per year, equivalent to an annual cost of approximately \$330,182. Over the three-year period covered by this ICR, EPA estimates the burden of the Program to be 10,295 hours and \$990,546 for respondents.

Methane Challenge ONE Future Commitment Partners

The total burden for ONE Future Commitment respondents is approximately 301.5 hours per year with an annual cost of approximately \$27,680. Over the three-year period covered by this ICR, EPA estimates the burden of the Program to be 905 hours and \$83,039 for respondents.

Natural Gas STAR Partners

The total burden for Partner respondents is estimated to be approximately 1,123.5 hours per year with an annual cost of approximately \$130,585. For vendors completing the Service Provider Directory form, the annual burden is estimated to be 2.5 hours and \$279.

6(e)(ii) The Agency Tally

The total annual burden to the Agency is approximately 423 hours with a cost of approximately \$31,710 per year. Over the three-year period covered by this ICR, EPA estimates the burden of the Methane Challenge and Natural Gas STAR Programs to be 1,270 hours and \$95,129 for EPA.

Methane Challenge (both Commitment Options)

The total annual burden to the Agency is approximately 310 hours with a cost of approximately \$23,168 per year. Over the three-year period covered by this ICR, EPA estimates the burden of the Program to be 929 hours and \$69,503 for EPA.

Natural Gas STAR (including Service Provider Directory)

The total annual burden to the Agency is approximately 114 hours with a cost of approximately \$8,452 per year. Over the three-year period covered by this ICR, EPA estimates the burden of the Program to be 8,542 hours and \$25,626 for EPA.

6(e)(iii) Variations in The Annual Bottom Line

EPA anticipates some variation in the annual respondent reporting/recordkeeping burden over the three-year period covered by this ICR, with subsequent years of participation in the Program being less burdensome than the first year. This variation is due to the majority of Program materials requested

(Partnership Agreement, and for Methane Challenge, Implementation Plan and the optional Historical Actions Fact Sheet), being submitted during the first year of partnership. Subsequent years in the Program will include annual reporting and periodic updates to Program materials (as needed).

6(f) Reasons for Change in Burden

The overall annual burden for respondents under this ICR number increased from 3,184 hours in the previous ICR to 4,859 hours in the current ICR. This change is attributed to several factors including the addition of the Natural Gas STAR Program and the Service Provider Directory (which were previously included under OMB Control Number 2060-0328) as well as an increase in the number of Methane Challenge partners submitting annual reports.

For Methane Challenge, the overall burden has increased because there are now more respondents submitting annual reports. Partners do not report until after their first full year in the Program, so the Program did not anticipate annual reports from any Partners in the first year of the original ICR (i.e., that covered August 2018 – August 2021). This resulted in a much lower annual average number of respondents (i.e., the number used to calculate the burden) in the original ICR (36). In the current ICR, with all founding Partners now reporting regularly, EPA expects over 60 reports annually.

It is worth noting, however, that the burden *per Methane Challenge respondent* has stayed the same for the BMP option and gone down for the ONE Future option¹ in this ICR renewal.

For Natural Gas STAR, the overall burden has decreased since its last ICR renewal in 2019 (under OMB Control Number 2060-0328). The change is attributed to several factors:

- A decrease in in the estimated number of Partners submitting reports annually;
- The removal of implementation plans from the Program; and
- The lowering of the annual reporting estimate for established Partners based on stakeholder feedback.

Finally, in the previous Natural Gas STAR ICR, the Service Provider Directory was introduced for the first time and the Programs expected a large number of vendors signing up when it first launched. Now that the directory is established, EPA anticipates fewer respondents per year.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 37 hours per partner response and 0.25 hours per service provider response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of

¹ Stakeholder consultations with ONE Future Commitment Option Partners indicated our annual reporting estimate in the original ICR was too high.

information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2016-0731, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is 202-566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2016-0731 and OMB Control Number 2060-0722 in any correspondence.

Exhibit B



NATURAL GAS STAR PROGRAM PARTNERSHIP AGREEMENT

The **Natural Gas STAR Program** is a flexible, voluntary partnership between EPA and the oil and natural gas industry aimed at demonstrating the cost-effectiveness and environmental benefits of methane emission reduction opportunities.

This is a voluntary agreement between _____ (*company name*) and the U.S. Environmental Protection Agency (EPA) for the purpose of reducing methane releases to the atmosphere by implementing cost-effective emission reduction technologies and practices. Responsibilities for both parties and General Terms are outlined on the following page.

Please select which sector segment(s) this partnership will cover (*check all that apply*):

- Production Gathering and Processing Transmission Distribution
-

Authorized Partner Company Representative: (*name and title*)

Name, Title

Signature: _____ *Date:* _____

EPA Representative:

Paul M. Gunning: Director, Climate Change Division, U.S. Environmental Protection Agency

Signature: _____ *Date:* _____

Partner Designated Natural Gas STAR Implementation Manager:

Name:

Address:

Title:

City/State/Zip:

E-mail:

Telephone:

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2060-0328). Responses to this collection of information are voluntary 42 USC 7403(g). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to 57 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA's Responsibilities

1. Provide contact information for an EPA Program Manager to assist the Partner in Program implementation.
2. Assist Partners with Program implementation with the following, as appropriate:
 - a. Analyzing and developing information on emerging technologies and practices;
 - b. Developing workshops and training courses; and
 - c. Providing technical assistance to Partners in implementing the Program Best Management Practices (BMPs) found at www.epa.gov/natural-gas-star-program
3. Provide public recognition for Partner company commitments to the Program through acknowledgement on EPA's web site.
4. EPA will only release information obtained from the Partner company without prior authorization from that company if required to do so under the Freedom of Information Act, the Agency's regulations at 40 CFR part 2, subpart B, or other applicable law.

Natural Gas STAR Partner's Responsibilities

1. Appoint a company representative as the Natural Gas STAR Program Implementation Manager responsible for implementing this voluntary agreement.
2. Develop a company-specific approach for active participation in the Program, including identifying expected activities and scope of implementation. This may include development of an Implementation Plan to be shared with EPA.
3. Annually evaluate cost-effective methane emission reduction opportunities and voluntarily implement BMPs to the extent feasible across operations within the United States.
4. Engage and share information with the Program on voluntary emission reduction activities annually, including one or more of the following activities:
 - a. Providing EPA with annual reports describing the BMPs implemented;
 - b. Presenting at a Natural Gas STAR workshop or other Program event; or
 - c. Developing technical documents that can be shared with Partners, such as through the Natural Gas STAR website.
5. Communicate participation to employees and cooperate with EPA efforts to publicize the Program.

General Terms

1. This agreement can be terminated by either party at any time, with no penalties and no further obligation. EPA requests that Partners notify EPA immediately if they plan to withdraw from the Partnership. EPA agrees not to publicize a Partner's withdrawal from the Program.
2. The Partner agrees that the activities it undertakes connected with this agreement are not intended to provide services to the federal government and that the Partner will not seek compensation from a federal agency.
3. The Partner agrees that it will not claim or imply that its participation in the Program constitutes EPA approval or endorsement of anything other than the commitment to the Program.
4. The Partner agrees to only share non-Confidential Business Information (CBI) to fulfill Gas STAR Program requirements, and understands that information submitted to the Program is subject to the Freedom of Information Act.

Please sign this form and send to:

*EPA Natural Gas STAR Program
USEPA Headquarters
1200 Pennsylvania Avenue, NW
Mail Code: 6207A
Washington, DC 20460
GasSTAR@epa.gov*

If overnight, send to:

*1201 Constitution Ave NW
Room Number 4353PP
Washington, DC 20004*

Exhibit C

This is not the current EPA website. To navigate to the current EPA website, please go to www.epa.gov. This website is historical material reflecting the EPA website as it existed on January 19, 2017. This website is no longer updated and links to external websites and some internal pages may not work. [More information](#) »

Menu

United States Environmental Protection Agency

Natural Gas STAR Program

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Natural Gas STAR Program



The Natural Gas STAR Program provides a framework for partner companies with U.S. oil and gas operations to implement methane reducing technologies and practices and document their voluntary emission reduction activities. By joining the Program, partners commit to: 1) evaluate their methane emission reduction opportunities, 2) implement methane reduction projects where feasible, and 3) annually report methane emission reduction actions to the EPA.

[Benefits](#)

[Join Program](#)

[Reporting](#)

[Accomplishments](#)

[Ensure Success](#)

By working together to reduce methane emissions, EPA and Natural Gas STAR partners are successfully improving performance, increasing natural gas supply, saving money, and protecting the environment. Participation in the Natural Gas STAR Program has numerous benefits, including:

- **Information Sharing and Technology Transfer** – EPA facilitates Technology Transfer and Annual Implementation Workshops to help partners learn about new and innovative technologies and practices.
- **Peer Networking** – Partners can participate in Technology Transfer Workshops, Annual Implementation Workshops, and Web-based communications to build strong networks with industry peers and keep up on industry trends, initiatives, and the latest technologies.
- **Voluntary Record of Reductions** – Through Program participation and reporting, companies create a permanent record of their voluntary accomplishments in reducing methane emissions. In addition, annual reporting allows EPA to provide feedback to partners through individual, detailed summary reports.
- **Public Recognition** – EPA provides recognition to highlight partner achievements in articles, industry journals, technical studies and fact sheets. EPA also helps partners communicate Program achievements to shareholders, customers, and the public.

Contact Us to ask a question, provide feedback, or report a problem.

Natural Gas STAR Home

Voluntary Partnerships

Natural Gas STAR Program

Natural Gas STAR International

Methane Challenge Program

Program Partners

Recommended Technologies

Service Provider Directory

Providers by Equipment

Providers by Service

Complete Directory Contents

Industry Overview

Reports and Technical Resources

Outreach and Events

Discover.

Accessibility

EPA Administrator

Budget & Performance

Contracting

Grants

No FEAR Act Data

Privacy and Security

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LAST UPDATED ON DECEMBER 21, 2016


Exhibit D

[Jump to main content](#)

US EPA

United States Environmental Protection Agency

Natural Gas STAR Online Reporting System



Welcome

Please contact EPA at (202) 343-9630, or send an e-mail to the EPA Program Manager, [Jerome Blackman](#), if you have questions.

The deadline for submitting reports for the 2018 annual reporting season was June 15, 2018.

The online reporting system enables Natural Gas STAR partners to electronically submit annual methane emissions reduction data to EPA. The system allows users to add, edit, view, and print methane emissions reduction data for the current reporting year prior to submittal.

The Program intends to collect ONLY non-Confidential Business Information (CBI) data to meet companies' Gas STAR Program commitments. Please note that, prior to submitting a report, companies will have to check a box to confirm that they are not submitting CBI information. If you have any questions or concerns, please contact a Gas STAR Program Manager.

This website uses JavaScript to perform calculations and navigation. Please ensure that your browser is using JavaScript. For the best experience, we recommend using a desktop computer with Chrome 16 or later or Firefox 13.0 or later. If you experience difficulties using the site, please contact EPA. [Check to see if JavaScript is enabled.](#)

The deadline for submitting reports for the 2018 annual reporting season was June 15, 2018.

Please contact EPA at (202) 343-9630, or send an e-mail to the EPA Program Manager, [Jerome Blackman](#), if you need to update your report.

Main menu

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- [Accessibility](#)
- [EPA Administrator](#)
- [Budget & Performance](#)
- [Contracting](#)
- [Grants](#)
- [January 19, 2017 Web Snapshot](#)
- [No FEAR Act Data](#)
- [Privacy](#)
- [Privacy and Security Notice](#)

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Last updated on March 22, 2018

Exhibit E



U.S. ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

OMB Control No. 2060-0328
Expires 04/30/2022

Natural Gas STAR Annual Report - Production Segment

FORM VERSION: REPORTING SEASON 2021 (for activities completed in 2020)

RS2021PRODV1

Partner Name	
Reporting Year	2020

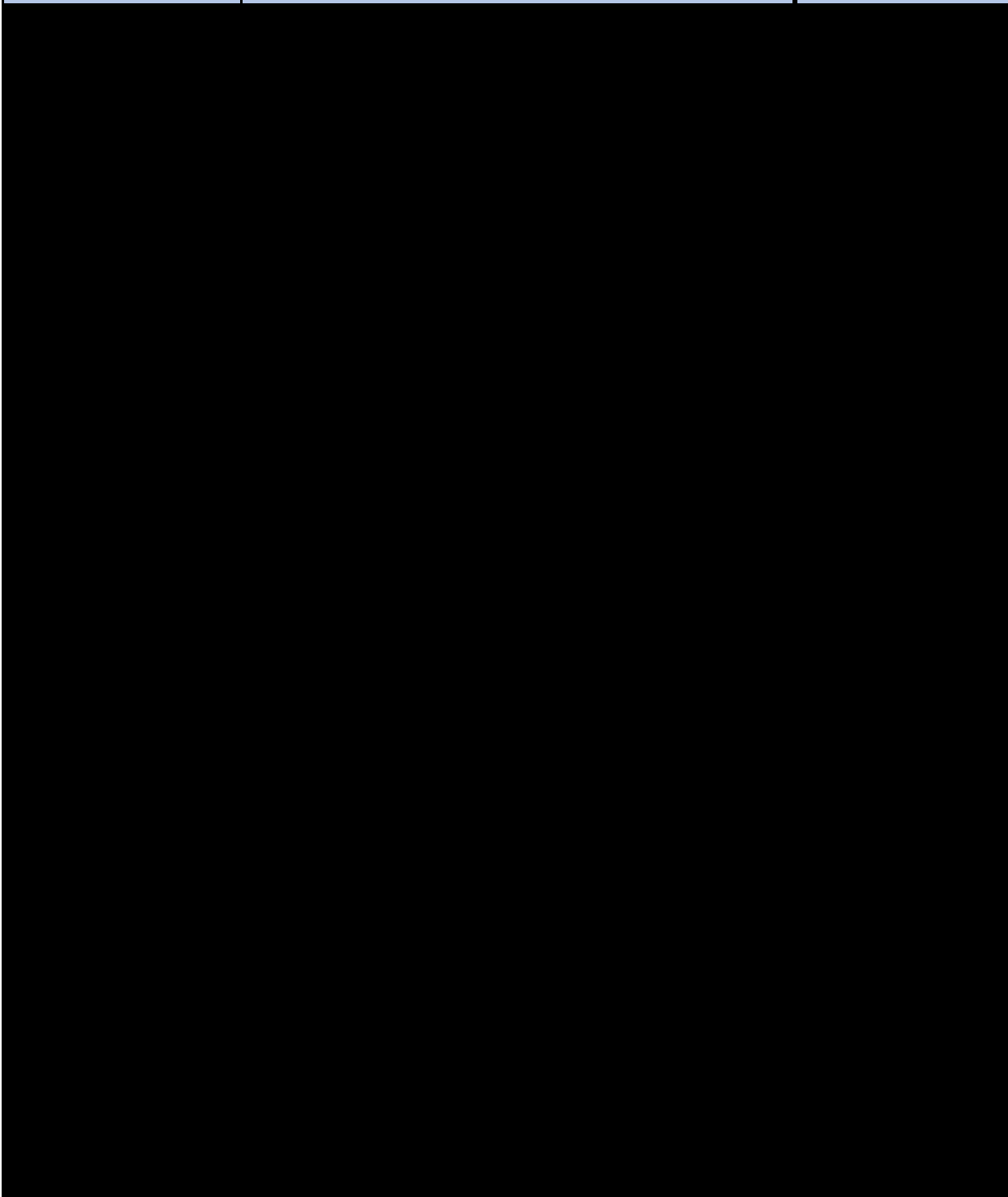
Use the Table of Contents below to navigate to the different tabs of the form. You can use column B to indicate if you reported data on a specific tab.

Production Emission Sources	Data Reported	Information
Dehydrator Vents	No	Install flash tank separators on glycol dehydrator vents
Pneumatic Controllers	No	Convert high-bleed controllers to low-bleed; convert high-bleed or low-bleed controllers to zero-emitting controllers; remove controllers from service with no replacement
Additional Production Activities	No	Use this tab to report all other methane reductions in the Production segment. You will be able to select the technology/practice used from the list of Natural Gas STAR Partner Reported Opportunities. If the activity you are reporting is not included in the list, please contact EPA at GasSTAR@epa.gov

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2060-0328). Responses to this collection of information are voluntary 42 USC 7403(g). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to range from 25 to 51 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

[Return to Table of Contents](#)

Calculate Using Default		
Average Gas Throughput (MMcf/yr)	Calculated Total Methane Emission Reduction Based on Default Values {[Number of Flash Tank Separators Installed]x[Average Gas Throughput]} x 170 scf/MMcf x 0.9 / 1000}]	TEG Circulation Rate (gal/hr)



Calculate Using Standard Calculation		
Methane Entrainment Rate (scf/gal)	Hours of Operation (hrs/yr)	Calculated Total Methane Emission Reduction Based on Standard Calculation {[TEG Circulation Rate]x [Methane Entrainment Rate]x[Hours of Operation] x 0.9} / 1000}

Other Calculation	
Total Methane Emission Reduction Based on Other Assumptions (Mcf/yr)	Explain Reduction Calculation Used

This sheet summarizes values used in calculations in this workbook. If you have ques

Install Flash Tank Separators on Glycol Dehydrators

Default Values

Emission Factor ¹	170
Efficiency ²	0.9

Pneumatic Controllers

Emission Factors

Source: 40 CFR 98, Table 1

Low Continuous Bleed Pneumatic Device Vents	1.39
High Continuous Bleed Pneumatic Device Vents	37.3

Default Values

Operating hours	8760
Methane content of natural gas	82.1%

Notes:

¹ Derived from "Methane Emissions from the Natural Gas Industry," Volume 14, Glycol Dehyd

² Derived from "Optimize Glycol Circulation And Install Flash Tank Separators In Glycol Dehyd

tions on any of the values used, please contact EPA at GasSTAR@epa.gov

scf/MMcfd

percent (expressed as decimal)

W-1A (Population Emission Factors, Gas Service)

scf whole gas / hr / device

scf whole gas / hr / device

Assumes 24/7 operation all year

Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016, Annex 3.6 (Table 3.6-3), https://www.epa.gov/sites/production/files/2018-04/2018_ghgi_natural_gas_systems_annex_tables.xlsx

rators, co-sponsored by the Gas Research Institute and EPA, June 1996.

rators" Lessons Learned document, EPA, October 2006.

Exhibit F

Implementation Plan



Production Sector

Company Information

Company Name: _____

Gas Star Contact: _____

Position: _____

Address: _____

City, State, Zip Code: _____

Telephone: _____

Fax: _____

Email: _____

Implementation Plan Elements

ELEMENT 1 Best Management Practices (BMPs)

The following BMPs have been identified as significant opportunities to cost effectively reduce methane emissions from the production sector. They were selected based on their applicability to the industry, economic feasibility, and cost-effectiveness. There are two core BMPs for the production sector:

- BMP 1** Identify and replace high-bleed pneumatic devices
BMP 2 Install flash tank separators on glycol dehydrators

For detailed information on these BMPs, please refer to the Lessons Learned publications on the Natural Gas STAR website: <https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions>.

ELEMENT 2 Additional Activities

Current partners have reported many processes and technologies that are considered additional Best Management Practices by the program. New partners are encouraged to evaluate and report current and new practices or technologies that cost effectively reduce methane emissions

ELEMENT 3 Inventory Past Reductions

Partners are encouraged to report past methane emission reductions back to 1990. Accounting for these historical reductions will create a permanent record of your company's methane emission reduction efforts. In addition, reviewing past activities will help guide companies' participation in Natural Gas STAR by creating a base of understanding of current activities to facilitate planning of future activities.

The Implementation Plan is designed to be a dynamic tool for Natural Gas STAR Partners to plan their program activities. As company priorities and plans shift over time, the Implementation Plan may be revised or updated by submitting a new form to the program. The Partner should only share non-Confidential Business Information (CBI) to fulfill Gas STAR Program requirements.

ELEMENT 1
Best Management Practices

BMP 1
Identify and Replace High-Bleed Pneumatic Devices

Pneumatic devices used to control and monitor gas and liquid flows and levels in dehydrators and separators, temperature in dehydrator regenerators, and pressure in flash tanks emit large amounts of methane into the atmosphere. Replacing these with low- or no-bleed devices reduces or eliminates emissions and improves safety.

Estimated Reduction
Potential
124 Mcf/year/device

Will you be implementing this BMP? Yes No

If no, why?

- Not cost effective
- May consider at a later date
- Other _____

Please describe:

If yes, at what scale will you be implementing this BMP?

- Company Wide
- Pilot Project
- Other

Please describe:

Activity Summary

Number of high-bleed pneumatic devices in system? _____

Number of high-bleed pneumatic devices to be replaced? _____

Replacement Schedule

Number of high-bleed pneumatic devices to be replaced by the end of:

Year 1: _____ Year 2: _____ Year 3: _____ Year 4: _____

Additional Information on Anticipated Plans and Projects

If additional space is needed, please continue on the back.

BMP 2
Install Flash Tank Separators on Glycol Dehydrators

Installing a flash tank separator in a glycol dehydrator facilitates the removal of methane and natural gas liquids from the glycol stream. The recovered gas can be put back into the pipeline, used as a fuel on-site, or flared.	Estimated Reduction Potential 170 scf/MMcf of throughput
---	---

Will you be implementing this BMP? Yes No

If no, why?

Not cost effective

May consider at a later date

Other _____

Please describe:

If yes, at what scale will you be implementing this BMP?

Company Wide

Pilot Project

Other _____

Please describe:

Activity Summary

Number of glycol dehydrators currently equipped with flash tank separators _____

Number of glycol dehydrators suitable for flash tank installation? _____

Replacement Schedule

Number of flash tank separators to be installed by the end of:

Year 1: _____ Year 2: _____ Year 3: _____ Year 4: _____

Additional Information on Anticipated Plans and Projects

If additional space is needed, please continue on the back.

ELEMENT 2
Additional Activities

Additional Activities

Your company may take advantage of additional technologies or practices to reduce methane emissions. The following is a list of some of the additional activities that have been reported by other Natural Gas STAR partners, which may be applicable to your operations (for more information on these activities, please view: <https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions>):

- ☆ Install Vapor Recovery Units (VRUs) on storage tanks
- ☆ Artificial lift: Install plunger lifts in gas wells
- ☆ Reduce venting from unlit pilot: install electronic safety devices
- ☆ Install instrument air systems
- ☆ Eliminate unnecessary equipment and/or systems
- ☆ Perform reduced emissions completions for hydraulically fractured natural gas wells

Additional activities you will be implementing	Please describe
Activity _____ At what scale will this activity be implemented? <input type="checkbox"/> Company Wide <input type="checkbox"/> Pilot Project <input type="checkbox"/> Other _____	
Activity _____ At what scale will this activity be implemented? <input type="checkbox"/> Company Wide <input type="checkbox"/> Pilot Project <input type="checkbox"/> Other _____	
Activity _____ At what scale will this activity be implemented? <input type="checkbox"/> Company Wide <input type="checkbox"/> Pilot Project <input type="checkbox"/> Other _____	
Activity _____ At what scale will this activity be implemented? <input type="checkbox"/> Company Wide <input type="checkbox"/> Pilot Project <input type="checkbox"/> Other _____	

ELEMENT 3
Inventory Past Reductions

An inventory of past reductions will help to create a permanent record of your past efforts.

As a first step, many new partners find it useful to inventory and document past methane emission reduction efforts. The inventory process helps companies quantify the success of their past activities and target future emission reduction efforts. Historical methane emission reductions identified as part of the inventory process can be reported to the Natural Gas STAR Program.

Will you inventory past activities to include in your annual report? Yes No

If yes, please describe your company's plans for reviewing past methane emission reduction activities.

The Natural Gas STAR Program thanks you for your time.

Please send completed forms to:

Regular Mail
Natural Gas STAR Program
U.S. EPA (6207A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Express/Overnight Mail
Natural Gas STAR Program
1201 Constitution Ave NW
Room Number 4353PP
Washington, DC 20004

Questions? Please call Jerome Blackman at (202) 343-9630, or send an email to GasSTAR@epa.gov.



The public reporting and recordkeeping burden for this collection of information is estimated to average 25 hours for each new response and 12 hours for subsequent responses. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Exhibit G

[REDACTED] the
[REDACTED] center for
[REDACTED] investigative
[REDACTED] reporting

US Environmental Protection Agency
National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

October 1, 2021

VIA ELECTRONIC DELIVERY

**NEWS MEDIA REQUESTER
FEE WAIVER REQUESTED**

Re: Request for Natural Gas STAR Program Annual Reports

Dear Chief FOIA Officer:

I am a reporter for The Center for Investigative Reporting (“CIR”), the oldest non-profit investigative newsroom in the country. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I request the following records:

Natural Gas STAR Program annual reports submitted by any current and former program partners to the Environmental Protection Agency from reporting year 2010 through to reporting year 2020. Respondent records should include reports from all segments of the oil and natural gas industry, including but not be limited to Production Segment, Transmission Segment, Distribution Segment, and Gathering and Processing Segment.

The Natural Gas STAR Program Partnership Agreement between the EPA and oil and natural gas program participants states that program partners agree to “only share non-Confidential Business Information” and that information submitted is “subject to the Freedom of Information Act.”

Find attached copies of the Natural Gas STAR Program Partnership Agreement and copies of the current annual report forms for the oil and natural gas industry segments

downloaded from the Natural Gas STAR program webpage on September 24, 2021. Additionally, find attached a copy of this request in letter format.

If possible, I would prefer that these records be provided in a machine-readable format such as a CSV or Excel file, and transferred electronically. As a reporter for CIR, I am a news media requester for the purpose of fees. Because this request is being made for a journalistic purpose, I further ask that you waive any fees for provision of the records. Additionally, please notify me of costs before taking any billable steps.

If you deny this request in whole or in part, I request that you respond with the statutory exemption underlying the denial and the reasoning therein. If an asserted exemption applies to only a portion of a record, please delete or redact the portion to which the exemption applies.

If you have any questions about my request, please do not hesitate to e-mail me or call me. The Center for Investigative Reporting's legal counsel is also copied on this letter. We look forward to a response as quickly as possible under the provisions of the Freedom of Information Act (FOIA).

Sincerely,

Mohamed Al Elew
malelew@revealnews.org
858-649-9519

cc: D. Victoria Baranetsky, General Counsel, The Center for Investigative Reporting
Shawn Musgrave, First Amendment Fellow, The Center for Investigative Reporting

Request For Fee Waiver

Factor 1.

This request concerns the operations and activities of the EPA, a federal government agency. Specifically, I am requesting documentation from an Environmental Protection Agency program providing a framework for Oil and Natural Gas companies to plan, implement, and report methane emission reductions. Public documentation from the EPA of the program provides direct reference to the existence of annual reports submitted to the agency that are subject to public disclosure laws.

Factor 2.

The disclosure of the requested documents would contribute to the public's understanding of the EPA's Natural Gas STAR Program, evaluates and implements cost-effective methane emission reduction technologies and practices with industry partners. I have not been able to find the requested documents in the public domain.

Factor 3.

The requested documents will contribute to public understanding because I will publish them via my reporting. As a reporter for CIR, I am a member of the news media who has previously covered the oil and natural gas industry. The disclosure of the requested information will contribute to the public's understanding of the impact of existing voluntary government programs.

Factor 4.

Disclosure of these documents will significantly contribute to public understanding. Prior to the disclosure of these documents, the public only has access to annual aggregate summaries of the reports. The disclosure of these documents will significantly improve the public's understanding of each individual partner's performance in the program. In addition to the disclosure of individual partner's performance, the disclosure of these documents will significantly improve the public understanding of the top activities reducing methane emissions which are currently all lumped together under 'other' in the public annual aggregate summary of the reports.

Factor 5.

Neither the Center for Investigative Reporting, a non-profit news organization, nor I have a commercial interest in these documents. My interest in the documents is as a journalist in significantly improving the public's understanding of the agency's programs in reducing methane emissions.

Factor 6.

As discussed above, I do not have a commercial interest in the disclosure of these records. As a journalist at a nonprofit news organization, I have an interest in contributing to the public's understanding of the agency's programs to reduce methane emissions.

Exhibit H



Shawn Musgrave <smusgrave@revealnews.org>

Fwd: FOIA Request EPA-2022-000019 Submitted

1 message

Mohamed Al Elew <malelew@revealnews.org>
To: Shawn Musgrave <smusgrave@revealnews.org>

Fri, Oct 1, 2021 at 8:43 AM

Submission confirmation

----- Forwarded message -----

From: <foia_hq@epa.gov>
Date: Fri, Oct 1, 2021 at 10:40 AM
Subject: FOIA Request EPA-2022-000019 Submitted
To: <malelew@revealnews.org>

This message is to confirm your request submission to the FOIAonline application: [View Request](#). Request information is as follows:

- Tracking Number: EPA-2022-000019
- Requester Name: Mohamed Al Elew
- Date Submitted: 10/01/2021
- Request Status: Submitted
- Description: NEWS MEDIA REQUESTER
FEE WAIVER REQUESTED

Re: Request for Natural Gas STAR Program Implementation Plans

Dear Chief FOIA Officer:

I am a reporter for The Center for Investigative Reporting ("CIR"), the oldest non-profit investigative newsroom in the country. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I request the following records:

Natural Gas STAR Program implementation plans submitted by any current and former program partners to the Environmental Protection Agency from January 1, 2010 through to September 30, 2021. Respondent records should include implementation plans from all segments of the oil and natural gas industry, including but not be limited to Production Segment, Transmission Segment, Distribution Segment, and Gathering and Processing Segment.

The Natural Gas STAR Program Partnership Agreement between the EPA and oil and natural gas program participants states that program partners agree to "only share non-Confidential Business Information" and that information submitted is "subject to the Freedom of Information Act."

Find attached copies of the Natural Gas STAR Program Partnership Agreement and copies of the current example implementation plans for the oil and natural gas industry segments downloaded from the Natural Gas STAR program webpage on September 27, 2021. Additionally, find attached a copy of this request in letter format.

If possible, I would prefer that these records be provided in a machine-readable format such as a CSV or Excel file, and transferred electronically. As a reporter for CIR, I am a news media requester for the purpose of fees. Because this request is being made for a journalistic purpose, I further ask that you waive any fees for provision of the records. Additionally, please notify me of costs before taking any billable steps.

If you deny this request in whole or in part, I request that you respond with the statutory exemption underlying the denial and the reasoning therein. If an asserted exemption applies to only a portion of a record, please delete or redact the portion to which the exemption applies.

If you have any questions about my request, please do not hesitate to e-mail me or call me. The Center for Investigative Reporting's legal counsel is also copied on this letter. We look forward to a response as quickly as

possible under the provisions of the Freedom of Information Act (FOIA).

Sincerely,

Mohamed Al Elew
malew@revealnews.org
858-649-9519

Exhibit I



Shawn Musgrave <smusgrave@revealnews.org>

Fwd: FOIA Fee Waiver Disposition Reached for EPA-2022-000019

Mohamed Al Elew <malelew@revealnews.org>
To: Shawn Musgrave <smusgrave@revealnews.org>

Thu, Oct 7, 2021 at 1:10 PM

Fee waiver granted

----- Forwarded message -----

From: <admin@foiaonline.gov>
Date: Thu, Oct 7, 2021 at 2:21 PM
Subject: FOIA Fee Waiver Disposition Reached for EPA-2022-000019
To: <malelew@revealnews.org>

Your request for Fee Waiver for the FOIA request EPA-2022-000019 has been fully granted. Additional details for this request are as follows:

- Request Created on: 10/01/2021
- Request Description: NEWS MEDIA REQUESTER
FEE WAIVER REQUESTED

Re: Request for Natural Gas STAR Program Implementation Plans

Dear Chief FOIA Officer:

I am a reporter for The Center for Investigative Reporting ("CIR"), the oldest non-profit investigative newsroom in the country. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I request the following records:

Natural Gas STAR Program implementation plans submitted by any current and former program partners to the Environmental Protection Agency from January 1, 2010 through to September 30, 2021. Respondent records should include implementation plans from all segments of the oil and natural gas industry, including but not be limited to Production Segment, Transmission Segment, Distribution Segment, and Gathering and Processing Segment.

The Natural Gas STAR Program Partnership Agreement between the EPA and oil and natural gas program participants states that program partners agree to "only share non-Confidential Business Information" and that information submitted is "subject to the Freedom of Information Act."

Find attached copies of the Natural Gas STAR Program Partnership Agreement and copies of the current example implementation plans for the oil and natural gas industry segments downloaded from the Natural Gas STAR program webpage on September 27, 2021. Additionally, find attached a copy of this request in letter format.

If possible, I would prefer that these records be provided in a machine-readable format such as a CSV or Excel file, and transferred electronically. As a reporter for CIR, I am a news media requester for the purpose of fees. Because this request is being made for a journalistic purpose, I further ask that you waive any fees for provision of the records. Additionally, please notify me of costs before taking any billable steps.

If you deny this request in whole or in part, I request that you respond with the statutory exemption underlying the denial and the reasoning therein. If an asserted exemption applies to only a portion of a record, please delete or redact the portion to which the exemption applies.

If you have any questions about my request, please do not hesitate to e-mail me or call me. The Center for Investigative Reporting's legal counsel is also copied on this letter. We look forward to a response as quickly as possible under the provisions of the Freedom of Information Act (FOIA).

Sincerely,

Mohamed Al Elew
malew@revealnews.org
858-649-9519

- Fee Waiver Original Justification: Factor 1.

This request concerns the operations and activities of the EPA, a federal government agency. Specifically, I am requesting documentation from an Environmental Protection Agency program providing a framework for Oil and Natural Gas companies to plan, implement, and report methane emission reductions. Public documentation from the EPA of the program provides direct reference to the existence of implementation plans submitted to the agency that are subject to public disclosure laws.

Factor 2.

The disclosure of the requested documents would contribute to the public's understanding of the EPA's Natural Gas STAR Program, evaluates and implements cost-effective methane emission reduction technologies and practices with industry partners. I have not been able to find the requested documents in the public domain.

Factor 3.

The requested documents will contribute to public understanding because I will publish them via my reporting. As a reporter for CIR, I am a member of the news media who has previously covered the oil and natural gas industry. The disclosure of the requested information will contribute to the public's understanding of the impact of existing voluntary government programs.

Factor 4.

Disclosure of these documents will significantly contribute to public understanding. Prior to the disclosure of these documents, the public has access to technical presentations and program studies. The disclosure of these documents will significantly improve the public's understanding of each individual partner's implementation plan for the program.

Factor 5.

Neither the Center for Investigative Reporting, a non-profit news organization, nor I have a commercial interest in these documents. My interest in the documents is as a journalist in significantly improving the public's understanding of the agency's programs in reducing methane emissions.

Factor 6.

As discussed above, I do not have a commercial interest in the disclosure of these records. As a journalist at a nonprofit news organization, I have an interest in contributing to the public's understanding of the agency's programs to reduce methane emissions.

- Fee Waiver Disposition Reason: N/A

Exhibit J



Shawn Musgrave <smusgrave@revealnews.org>

Fwd: Freedom of Information Act Request No. EPA-2022-000018: Due Date Extension Due to Usual Circumstances

Mohamed Al Elew <malelew@revealnews.org>
To: Shawn Musgrave <smusgrave@revealnews.org>

Thu, Oct 14, 2021 at 8:47 AM

Expected completion date

----- Forwarded message -----

From: Hopkins, Daniel <Hopkins.Daniel@epa.gov>

Date: Thu, Oct 14, 2021 at 9:21 AM

Subject: Freedom of Information Act Request No. EPA-2022-000018: Due Date Extension Due to Usual Circumstances

To: malelew@revealnews.org <malelew@revealnews.org>

Cc: Atkinson, Ephraim <Atkinson.Ephraim@epa.gov>, Lau, Patrick <Lau.Patrick@epa.gov>, Graff, Michelle <graff.michelle@epa.gov>

Dear Mr. Al Elew:

Thank you for your Freedom of Information Act request. This e-mail concerns the above-referenced Freedom of Information Act (FOIA) request, received by the U.S. Environmental Protection Agency (EPA) Freedom of Information Office on October 1, 2021 in which you requested:

"Natural Gas STAR Program annual reports submitted by any current and former program partners to the Environmental Protection Agency from reporting year 2010 through to reporting year 2020. Respondent records should include reports from all segments of the oil and natural gas industry, including but not be limited to Production Segment, Transmission Segment, Distribution Segment, and Gathering and Processing Segment."

Pursuant to 40 C.F.R. § 2.104(e), an extension of time to respond to your request is necessary. Given the scope of the request, EPA anticipates that response will require significant amount of EPA's resources and time to search for, and appropriately examine the voluminous amount of records to complete this request.

EPA anticipates that the response will take at least an additional 10 working days to respond. EPA has initiated the coordination of and search for responsive records in our files. Because of the circumstances described above, it is difficult to predict with certainty how many records may be involved. If you would like to modify or narrow your request so that it may be processed sooner, please contact Daniel Hopkins at hopkins.daniel@epa.gov or at 202-564-8626 with your response or if you have any further questions. At this time, EPA estimates the Agency will be able to complete this request by Friday, November 19, 2021. We appreciate your patience.

If you need any further assistance or would like to discuss any aspect of your request, you may seek assistance from EPA's FOIA Public Liaison at hq.foia@epa.gov or call (202) 566-1667. You may also seek assistance from the Office of Government Information Services (OGIS). You may contact OGIS in any of the following ways: by mail, Office of Government Information Services, National Archives and Records Administration, [8601 Adelphi Road, College Park, MD 20740-6001](https://www.archives.gov); email: ogis@nara.gov; telephone: (202) 741-5770 or (877) 684-6448; or fax: (202) 741-5769.

Thanks,

Daniel J. Hopkins

U.S. Environmental Protection Agency

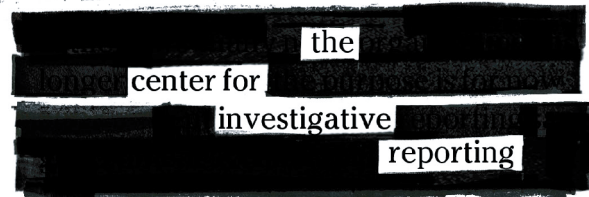
Office of Air and Radiation, Office of Atmospheric Programs

Office of Program Management Operations

Got a question? Check out PMO's [SharePoint](#) site.

T: 202-564-8626

Exhibit K



US Environmental Protection Agency
National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

October 1, 2021

VIA ELECTRONIC DELIVERY

**NEWS MEDIA REQUESTER
FEE WAIVER REQUESTED**

Re: Request for Natural Gas STAR Program Implementation Plans

Dear Chief FOIA Officer:

I am a reporter for The Center for Investigative Reporting (“CIR”), the oldest non-profit investigative newsroom in the country. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I request the following records:

Natural Gas STAR Program implementation plans submitted by any current and former program partners to the Environmental Protection Agency from January 1, 2010 through to September 30, 2021. Respondent records should include implementation plans from all segments of the oil and natural gas industry, including but not be limited to Production Segment, Transmission Segment, Distribution Segment, and Gathering and Processing Segment.

The Natural Gas STAR Program Partnership Agreement between the EPA and oil and natural gas program participants states that program partners agree to “only share non-Confidential Business Information” and that information submitted is “subject to the Freedom of Information Act.”

Find attached copies of the Natural Gas STAR Program Partnership Agreement and copies of the current example implementation plans for the oil and natural gas industry segments

downloaded from the Natural Gas STAR program webpage on September 27, 2021. Additionally, find attached a copy of this request in letter format.

If possible, I would prefer that these records be provided in a machine-readable format such as a CSV or Excel file, and transferred electronically. As a reporter for CIR, I am a news media requester for the purpose of fees. Because this request is being made for a journalistic purpose, I further ask that you waive any fees for provision of the records. Additionally, please notify me of costs before taking any billable steps.

If you deny this request in whole or in part, I request that you respond with the statutory exemption underlying the denial and the reasoning therein. If an asserted exemption applies to only a portion of a record, please delete or redact the portion to which the exemption applies.

If you have any questions about my request, please do not hesitate to e-mail me or call me. The Center for Investigative Reporting's legal counsel is also copied on this letter. We look forward to a response as quickly as possible under the provisions of the Freedom of Information Act (FOIA).

Sincerely,

Mohamed Al Elew
malelew@revealnews.org
858-649-9519

cc: D. Victoria Baranetsky, General Counsel, The Center for Investigative Reporting
Shawn Musgrave, First Amendment Fellow, The Center for Investigative Reporting

Request For Fee Waiver

Factor 1.

This request concerns the operations and activities of the EPA, a federal government agency. Specifically, I am requesting documentation from an Environmental Protection Agency program providing a framework for Oil and Natural Gas companies to plan, implement, and report methane emission reductions. Public documentation from the EPA of the program provides direct reference to the existence of implementation plans submitted to the agency that are subject to public disclosure laws.

Factor 2.

The disclosure of the requested documents would contribute to the public's understanding of the EPA's Natural Gas STAR Program, evaluates and implements cost-effective methane emission reduction technologies and practices with industry partners. I have not been able to find the requested documents in the public domain.

Factor 3.

The requested documents will contribute to public understanding because I will publish them via my reporting. As a reporter for CIR, I am a member of the news media who has previously covered the oil and natural gas industry. The disclosure of the requested information will contribute to the public's understanding of the impact of existing voluntary government programs.

Factor 4.

Disclosure of these documents will significantly contribute to public understanding. Prior to the disclosure of these documents, the public has access to technical presentations and program studies. The disclosure of these documents will significantly improve the public's understanding of each individual partner's implementation plan for the program.

Factor 5.

Neither the Center for Investigative Reporting, a non-profit news organization, nor I have a commercial interest in these documents. My interest in the documents is as a journalist in significantly improving the public's understanding of the agency's programs in reducing methane emissions.

Factor 6.

As discussed above, I do not have a commercial interest in the disclosure of these records. As a journalist at a nonprofit news organization, I have an interest in contributing to the public's understanding of the agency's programs to reduce methane emissions.

Exhibit L



Mohamed Al Elew <malelew@revealnews.org>

FOIA Request EPA-2022-000018 Submitted

foia_hq@epa.gov <foia_hq@epa.gov>
To: malelew@revealnews.org

Fri, Oct 1, 2021 at 10:20 AM

This message is to confirm your request submission to the FOIAonline application: [View Request](#). Request information is as follows:

- Tracking Number: EPA-2022-000018
- Requester Name: Mohamed Al Elew
- Date Submitted: 10/01/2021
- Request Status: Submitted
- Description: VIA ELECTRONIC DELIVERY

NEWS MEDIA REQUESTER
FEE WAIVER REQUESTED

Re: Request for Natural Gas STAR Program Annual Reports

Dear Chief FOIA Officer:

I am a reporter for The Center for Investigative Reporting ("CIR"), the oldest non-profit investigative newsroom in the country. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I request the following records:

Natural Gas STAR Program annual reports submitted by any current and former program partners to the Environmental Protection Agency from reporting year 2010 through to reporting year 2020. Respondent records should include reports from all segments of the oil and natural gas industry, including but not be limited to Production Segment, Transmission Segment, Distribution Segment, and Gathering and Processing Segment.

The Natural Gas STAR Program Partnership Agreement between the EPA and oil and natural gas program participants states that program partners agree to "only share non-Confidential Business Information" and that information submitted is "subject to the Freedom of Information Act."

Find attached copies of the Natural Gas STAR Program Partnership Agreement and copies of the current annual report forms for the oil and natural gas industry segments downloaded from the Natural Gas STAR program webpage on September 24, 2021. Additionally, find attached a copy of this request in letter format.

If possible, I would prefer that these records be provided in a machine-readable format such as a CSV or Excel file, and transferred electronically. As a reporter for CIR, I am a news media requester for the purpose of fees. Because this request is being made for a journalistic purpose, I further ask that you waive any fees for provision of the records. Additionally, please notify me of costs before taking any billable steps.

If you deny this request in whole or in part, I request that you respond with the statutory exemption underlying the denial and the reasoning therein. If an asserted exemption applies to only a portion of a record, please delete or redact the portion to which the exemption applies.

If you have any questions about my request, please do not hesitate to e-mail me or call me. The Center for Investigative Reporting's legal counsel is also copied on this letter. We look forward to a response as quickly as possible under the provisions of the Freedom of Information Act (FOIA).

Sincerely,

Mohamed Al Elew
malelew@revealnews.org
858-649-9519

Exhibit M



Shawn Musgrave <smusgrave@revealnews.org>

Fwd: FOIA Fee Waiver Disposition Reached for EPA-2022-000018

1 message

Mohamed Al Elew <malelew@revealnews.org>
To: Shawn Musgrave <smusgrave@revealnews.org>

Thu, Oct 7, 2021 at 1:10 PM

Fee waiver granted

----- Forwarded message -----

From: <admin@foiaonline.gov>
Date: Thu, Oct 7, 2021 at 2:17 PM
Subject: FOIA Fee Waiver Disposition Reached for EPA-2022-000018
To: <malelew@revealnews.org>

Your request for Fee Waiver for the FOIA request EPA-2022-000018 has been fully granted. Additional details for this request are as follows:

- Request Created on: 10/01/2021
- Request Description: VIA ELECTRONIC DELIVERY

NEWS MEDIA REQUESTER
FEE WAIVER REQUESTED

Re: Request for Natural Gas STAR Program Annual Reports

Dear Chief FOIA Officer:

I am a reporter for The Center for Investigative Reporting ("CIR"), the oldest non-profit investigative newsroom in the country. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I request the following records:

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If you deny this request in whole or in part, I request that you respond with the statutory exemption underlying the denial and the reasoning therein. If an asserted exemption applies to only a portion of a record, please delete or redact the portion to which the exemption applies.

If you have any questions about my request, please do not hesitate to e-mail me or call me. The Center for Investigative Reporting's legal counsel is also copied on this letter. We look forward to a response as quickly as possible under the provisions of the Freedom of Information Act (FOIA).

Sincerely,

Mohamed Al Elew
malew@revealnews.org
858-649-9519

- Fee Waiver Original Justification: Factor 1.

This request concerns the operations and activities of the EPA, a federal government agency. Specifically, I am requesting documentation from an Environmental Protection Agency program providing a framework for Oil and Natural Gas companies to plan, implement, and report methane emission reductions. Public documentation from the EPA of the program provides direct reference to the existence of annual reports submitted to the agency that are subject to public disclosure laws.

Factor 2.

The disclosure of the requested documents would contribute to the public's understanding of the EPA's Natural Gas STAR Program, evaluates and implements cost-effective methane emission reduction technologies and practices with industry partners. I have not been able to find the requested documents in the public domain.

Factor 3.

The requested documents will contribute to public understanding because I will publish them via my reporting. As a reporter for CIR, I am a member of the news media who has previously covered the oil and natural gas industry. The disclosure of the requested information will contribute to the public's understanding of the impact of existing voluntary government programs.

Factor 4.

Disclosure of these documents will significantly contribute to public understanding. Prior to the disclosure of these documents, the public only has access to annual aggregate summaries of the reports. The disclosure of these documents will significantly improve the public's understanding of each individual partner's performance in the program. In addition to the disclosure of individual partner's performance, the disclosure of these documents will significantly improve the public understanding of the top activities reducing methane emissions which are currently all lumped together under 'other' in the public annual aggregate summary of the reports.

Factor 5.

Neither the Center for Investigative Reporting, a non-profit news organization, nor I have a commercial interest in these documents. My interest in the documents is as a journalist in significantly improving the public's understanding of the agency's programs in reducing methane emissions.

Factor 6.

As discussed above, I do not have a commercial interest in the disclosure of these records. As a journalist at a nonprofit news organization, I have an interest in contributing to the public's understanding of the agency's programs to reduce methane emissions.

- Fee Waiver Disposition Reason: N/A