

No. 24-1247

**In the United States Court of Appeals  
for the District of Columbia Circuit**

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AMERICAN PETROLEUM INSTITUTE,

*Petitioner,*

*v.*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
and MICHAEL REGAN, in his official capacity as Administrator of  
the United States Environmental Protection Agency,

*Respondents.*

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**PETITION FOR REVIEW**

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Pursuant to 42 U.S.C. § 7607(b)(1), 5 U.S.C. §§ 701–06, Federal Rule of Appellate Procedure 15, and D.C. Circuit Rule 15, the American Petroleum Institute petitions for review of the United States Environmental Protection Agency’s and Administrator Michael S. Regan’s rulemaking entitled *Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems*, 89 Fed. Reg. 42062 (May 14, 2024). This rulemaking amends Subpart W of the Greenhouse Gas Reporting Rule to

impose new reporting requirements on petroleum and natural gas systems under section 136(h) of the Clean Air Act. 42 U.S.C. § 7436(h).

A copy of the challenged rulemaking is attached to this petition. This petition is timely filed, as it is filed within sixty days of the challenged action's publication in the Federal Register. *See* 42 U.S.C. § 7607(b)(1).

Dated: July 15, 2024

/s/ Steven P. Lehotsky

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**RULE 26.1 CORPORATE DISCLOSURE STATEMENT**

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Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and D.C. Circuit Rule 26.1, Petitioner submits the following statement:

The American Petroleum Institute (“API”) is API is a national, not-for-profit trade association representing all segments of America’s oil and natural gas industry. API’s nearly 600 members support more than 11.3 million jobs and produce, process, and distribute most of our nation’s energy. API was formed in 1919 as a standards-setting organization. In its over 100 years, API has developed more than 800 standards to enhance

operational and environmental safety, efficiency, and sustainability. API is not a publicly held corporation, and API has no parent corporation. No publicly held company has 10% or greater ownership interest in API. API is a “trade association” as defined by Circuit Rule 26.1(b).

Dated: July 15, 2024

/s/ Steven P. Lehotsky

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### Certificate of Service

I certify that on July 15, 2024, this Petition for Review and Rule 26.1

Disclosure Statement were delivered by email and by certified mail to:

Hon. Michael S. Regan, Administrator  
Office of the Administrator (1101A)  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

Hon. Merrick B. Garland  
Attorney General of the United States  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
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*/s/ Stephen P. Lehotsky*

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