



**Illinois Oil & Gas Association
P.O. Box 788
Mt. Vernon, Illinois 62864**

U.S. Environmental Protection Agency
The Honorable Lee Zeldin, Administrator
The Honorable David Fotouhi, Deputy Administrator
EPA-HQ-2025-0194
Reconsideration of 2009 Endangerment Finding
and Greenhouse Gas Vehicle Standards
September 10, 2025

On behalf of the nearly 1,000 members of the Illinois Oil & Gas Association (IOGA), I submit these comments to the United States Environmental Protection Agency (EPA) to support the EPA's proposal to repeal all greenhouse gas (GHG) emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines to effectuate the best reading of the Clean Air Act (CAA) section 202(a).

The oil and natural gas industry in Illinois supports 16,000 direct jobs in Illinois, over \$750 million in family income, and over \$700 million in state and local tax revenue. The average Illinois oil well produces about 2 barrels of oil per day.

The 2009 Endangerment Finding was politically motivated and not grounded in current scientific or economic realities. It continues to serve as the basis for sweeping, often damaging, regulatory decisions without proper legislative oversight or accountability. It is time to reassess outdated regulations like the Endangerment Finding that were built on incomplete science and continue to hinder domestic energy development. I am willing to provide additional details, upon request, related to any of the comments that have been submitted. I submit these comments to address opportunities for the small businesses that make up the oil and gas industry in Illinois and across the nation to work with regulators. Protecting the environment is in the best interest of our industry. Taking care of the environment is part of our goal as good corporate citizens. The owners and employees of Illinois oil and gas producing companies live in the same communities that they drill and operate oil and gas wells. They have a vested interest in not polluting the environment in which they and their families live.

Table of Contents

General Comments	3
Obama Administration Climate Plan.....	3
What about climate change?.....	7
EPA Actions.....	10
Energy Policy.....	15
Conclusion.....	17

General Comments

The Illinois Oil & Gas Association (IOGA) stands in support of the EPA's proposal to reconsider the legal and scientific foundation of the Endangerment Finding and adopt a more balanced, transparent approach to emissions policy - one that recognizes the environmental progress achieved by the onshore oil and gas industry and the critical role it plays in keeping America powered.

The Endangerment Finding is the legal prerequisite used by the Obama and Biden Administrations to regulate greenhouse gas emissions. Absent this finding, EPA would lack statutory authority under Section 202(a) of the Clean Air Act (CAA) to prescribe standards for greenhouse gas emissions. This proposal, if finalized, is expected to save Americans \$54 billion in costs annually through the repeal of all greenhouse gas standards.

Obama Administration Climate Plan

Former President Obama unveiled his vast anticarbon energy agenda in June 2013. The goal of the plan was said to be to reduce carbon emissions in the U.S. to control global climate change. However, data indicates that U.S. carbon emissions have been declining since 2007. Since 2012, the U.S. has led the way by reducing carbon emissions by 617 million metric tons. The second leading nation (United Kingdom) coming in far behind the U.S. at 163 million metric tons, less than one-third of what we have accomplished as a nation.

Crucial to pulling off this anticarbon energy plan was a decision by the Obama administration to change the way it accounts for carbon emissions, significantly raising what it calls the "social cost of carbon" tilting rulemaking against products and industries that use carbon energy.

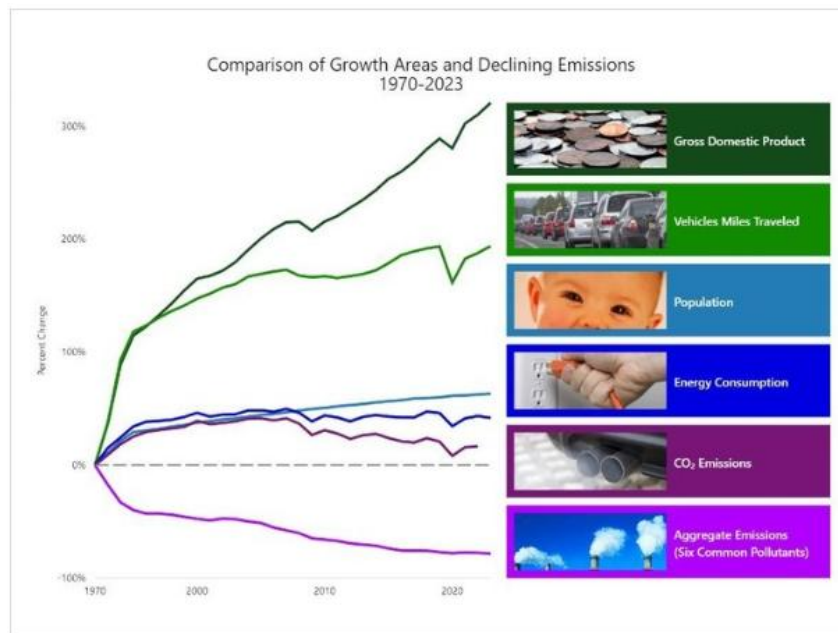
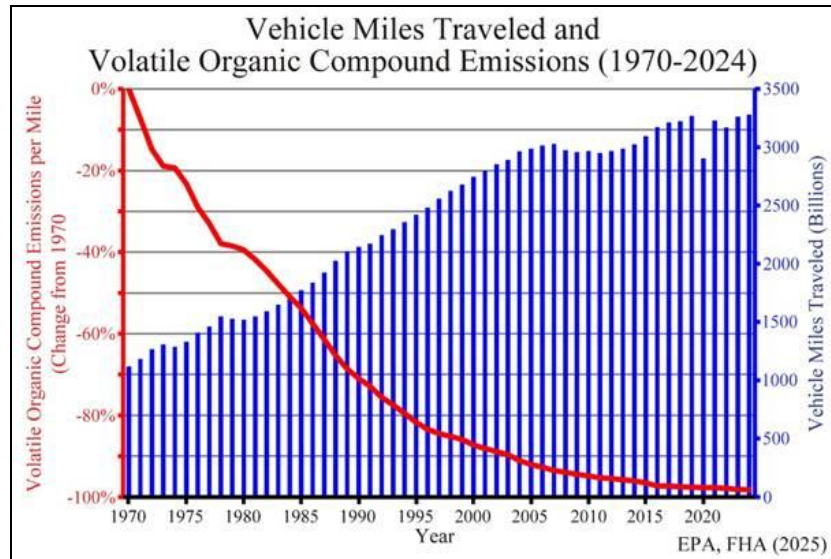
The concept of the "social cost of carbon" is not objective or scientific. It is based on subjective human decisions on what to include in the model, the discount rate to apply to future costs and benefits, and how to deal with uncertainty. The new model kept pushing carbon-cost estimates up. A larger value for the "social cost of carbon" basically means that efficiency standard or air pollution regulation that reduces carbon dioxide emissions will have higher benefits assigned to it. That makes it easier for stricter standards to pass a cost/benefit analysis.

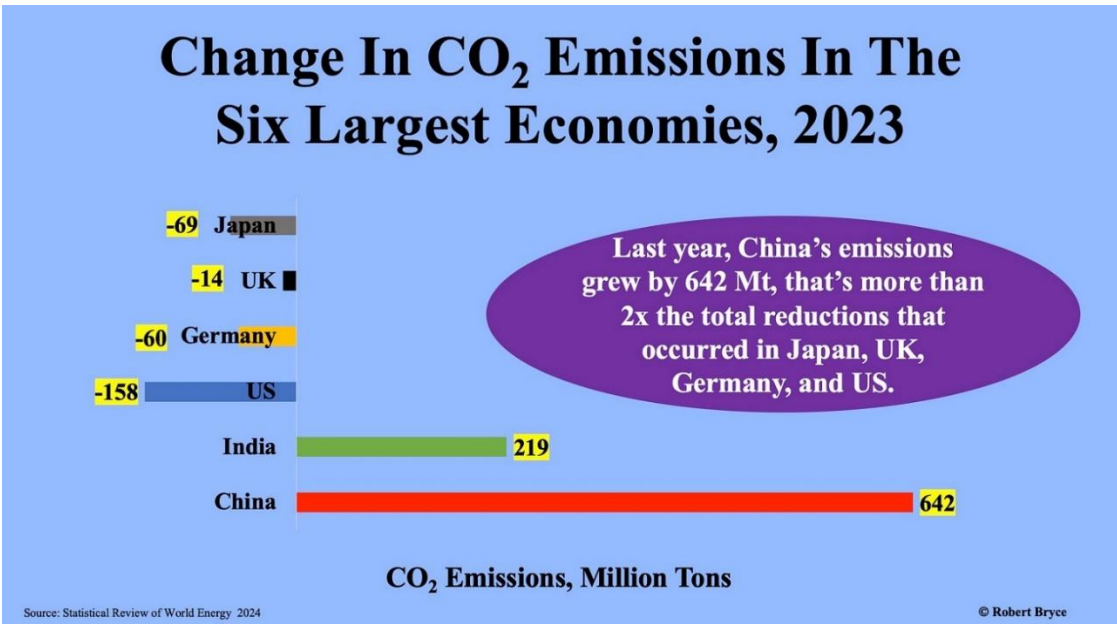
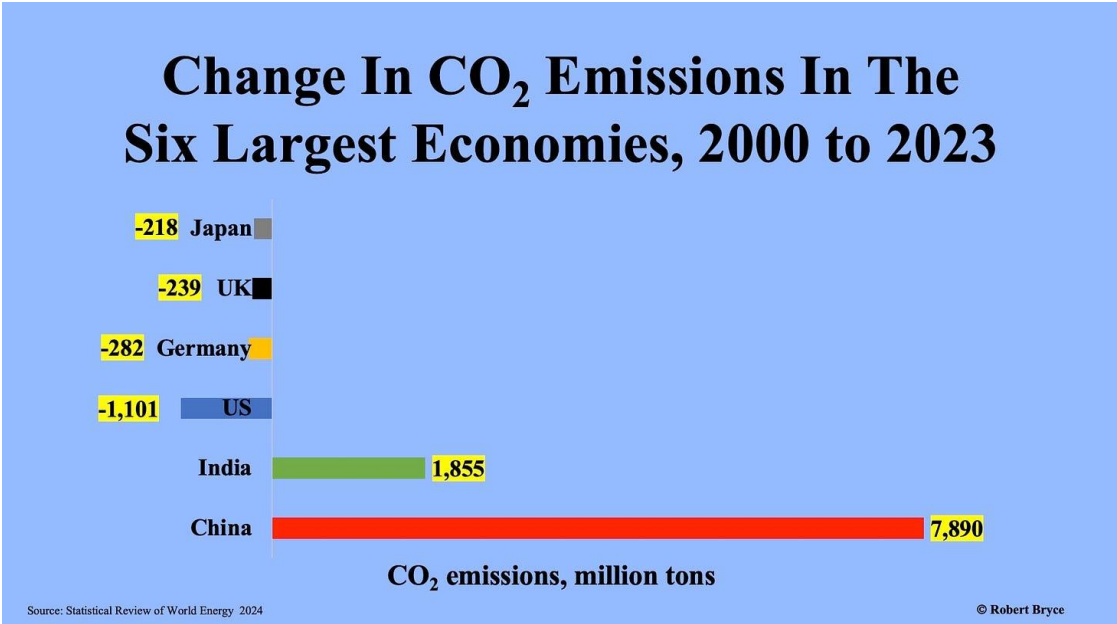
Anthropogenic (man-made) Contributions to Greenhouse Gases
Expressed as a % of Total (water vapor included)

Based on concentrations (ppb) adjusted for heat retention characteristics	% of Greenhouse Effect	% Natural	% Man-made
Water Vapor	95.000%	94.999%	0.001%
Carbon Dioxide (CO₂)	3.618%	3.502%	0.117%
Methane (CH₄)	0.360%	0.294%	0.066%
Nitrous Oxide (N₂O)	0.950%	0.903%	0.047%
Misc. gases	0.072%	0.025%	0.047%
Total	100.00%	99.72%	0.28%

Carbon dioxide (CO₂) makes up less than 4% of GHG. Water vapor accounts for about 95%

America leads the world in environmental quality, and we have made unprecedented progress while our population, economy, and energy consumption has grown. Emissions of the six “criteria pollutants” monitored by the EPA are down 78% in the last 50 years. Over the same period USGDP increased by 320%, vehicle miles traveled increased by 195%, population increased by 60%, and energy use increased by 48%. Meanwhile, emissions from the rest of the world have risen by 24%, led by China and India.

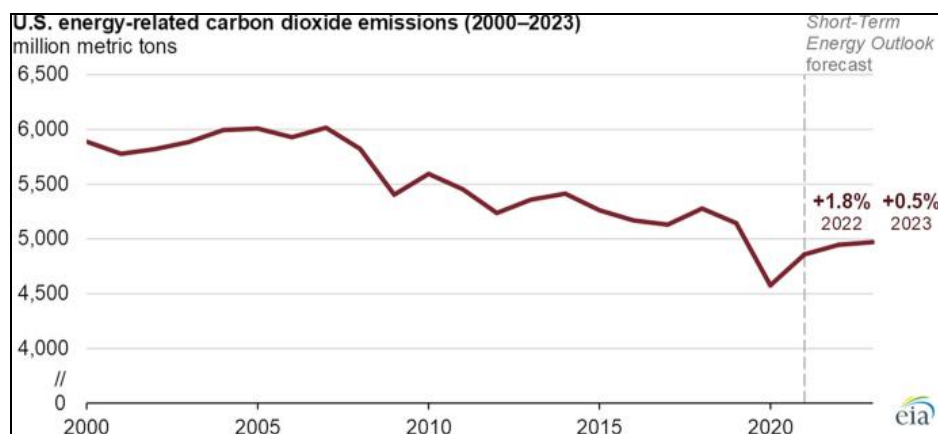




What about climate change?

Although global temperature has risen about one degree Celsius since the start of the industrial revolution, this has not wholly been caused by industrial warming gases linked to the economic growth that has increased the world's wealth, health, and life expectancy dramatically. Atmospheric physicists on both sides of the debate over potential climate catastrophe agree that the first half of the rise, before 1945, was largely caused by natural sources like long-term cycles or solar fluctuations. At that point, emissions were too low to have much of an impact. The substantial feedback warming that many climate models have predicted from fossil-fueled heat in the form of increased humidity and hence water vapor, the primary natural warming gas, has not yet been observed.

Emission Facts - Carbon dioxide emissions from U.S. energy consumption will remain near current levels through 2050, according to projections in the Energy Information Administration's (EIA) Annual Energy Outlook. The EIA projects that U.S. energy-related carbon dioxide (CO₂) emissions will be 5,019 million metric tons in 2050, 4% below their 2023 value.



Methane Emissions - The federal government has set its sights on methane emissions. Methane has become villain #2, right behind CO₂. Methane has been determined to be an even more potent greenhouse gas than CO₂. But according to the Biden administration, not a single methane molecule must get out, or we are all going to die from climate change. Never mind that methane breaks down a lot more quickly, which diminishes its effect. But that doesn't matter to climate alarmists and overreaching federal regulatory agencies. The Biden Administration saw every challenge as an opportunity to impose more burdensome regulations and raise taxes.

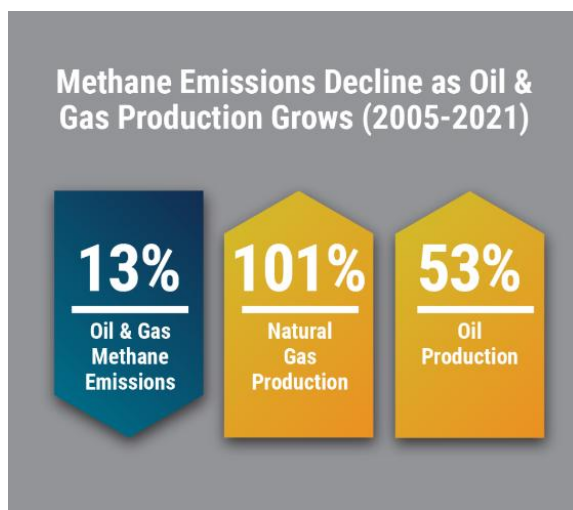
Methane (CH₄) is a more potent greenhouse gas than carbon dioxide (CO₂), though CH₄ is far less prevalent than CO₂ and has a much shorter atmospheric life. The real reason methane has become an obsession of environmental activist groups is that it sometimes leaks in nominal amounts when extracting or transporting oil and especially natural gas. Thus methane can be a pretext for interfering with and raising the costs of drilling. But this means willfully ignoring the plunge in U.S. methane emissions. Methane emissions from oil and gas operations declined by 14% from 1990-2017. According to the EPA, oil and gas methane emissions account for only 1.22% of total U.S. greenhouse gas emissions.

The EPA ignored the third-party study released in 2022 by the U.S. Department of Energy (DOE) on low-production well emission profiles. The independent DOE study indicates wells producing less than 15 BOEPD emit less than 3 tons per year. The EPA's 'one-size-fits-all' approach to regulating oil and gas methane emissions is inappropriate and disproportionately impacts conventional, low-production wells and small businesses.

Studies show that EPA methane rules would reduce global warming by 4 one-thousandths of one degree (0.004) by the year 2100. More studies show that eliminating fossil fuels entirely would only reduce warming by less than two-tenths of a degree by 2100.

Additionally, according to EPA, American oil and natural gas producers have reduced methane emissions by 37% since 2015 while increasing natural gas production by 51% and oil production 80% over that same time frame.

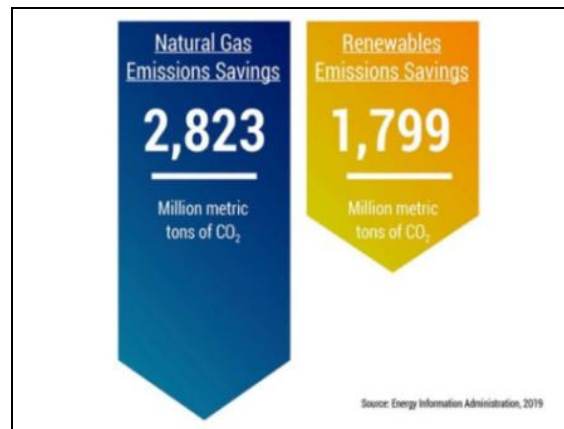
Additionally, according to EPA, American oil and natural gas producers have reduced methane emissions (1990-2021) by 13% while increasing natural gas production by 101% and oil production 53% over that same time frame.



Source: U.S. EPA, U.S. EIA 1990-2021

The fact is our nation's 21st century oil and gas market-driven success has helped our nation achieve significant emission reductions. When a country becomes the leading producer of oil and natural gas and has reduced carbon dioxide emissions by 70% in 10 years and reduced methane emissions from oil and natural gas operations by 37% since 2015, it is clearly doing many things right.

Energy Information Administration (EIA) data (2019) show natural gas is responsible for 2.8 billion metric tons of carbon dioxide emission reductions since 2005. That represents 61% of overall power sector reductions during that time-frame and 57% more than reductions attributable to renewables.



EIA reports show U.S. carbon emissions are the lowest they have been in nearly seven decades. Even more interesting is the fact that U.S. carbon emissions dropped while emissions from energy consumption for the rest of world increased. **America leads the world in environmental quality.**

The men and women of the oil and gas industry reject the stale mindset of last century's thinking peddled by some that oil/gas production and environmental stewardship are not compatible.

A recent research report showed that deaths related to air pollution exposure in the U.S. decreased by about 47% from 1990 to 2010. These improvements in air quality and public health in the U.S took place despite increases in population, energy and electricity use, and vehicle miles traveled. **People are 98.9% less likely to die from a climate-related natural disaster today than a century ago.**

Also, the findings of a recent environmental study published in the journal *Environmental Hazards* reinforces previous findings that when economic growth is taken into account, disasters like hurricanes and wildfires are less costly to society than in the past. The study found that the cost of disasters has actually fallen as a percentage of economic output since 1990.

Climatology is mostly guesswork. There is no way to conduct a controlled experiment to ascertain scientific validity. Climatologists have learned a lot, but actually controlling the climate is something else entirely. Climate science conventional wisdom is flawed, relies on alarmist scenarios, and exaggerates economic impacts.

While many are concerned about climate change, it is essential to balance the statistical uncertainty of climate studies and reports with the well-tested and known dangers of forcing flawed government programs on an economy. The best path forward in addressing both the economic prosperity and environmental preservation is to remove government barriers to competition in the energy sector and beyond.

EPA Actions

The Obama Administration Environmental Protection Agency (EPA) accurately characterized the rationale for their greenhouse gas regulation in its preamble:

EPA is proposing to tailor the major source applicability thresholds for greenhouse gas (GHG) emissions under the Prevention of Significant Deterioration (PSD) and title V programs of the Clean Air Act (CAA or Act) and to set a PSD significance level for GHG emissions. This proposal is necessary because EPA expects soon to promulgate regulations under the CAA to control GHG emissions and, as a result, trigger PSD and title V applicability requirements for GHG emissions. If PSD and title V requirements apply at the applicability levels provided under the CAA, State permitting authorities would be paralyzed by permit applications in numbers that are orders of magnitude greater than their current administrative resources could accommodate. On the basis of the legal doctrines of “absurd results” and “administrative necessity,” this proposed rule would phase in the applicability thresholds for both the PSD and title V programs for sources of GHG emissions.

EPA subsequently released its endangerment determination and created the scenario it projected would cause “absurd results” that necessitated the concoction of a regulatory framework to address. Fundamentally, EPA’s flawed interpretation of the CAA caused its catastrophic results – results that run counter to its own assessments of congressional intent in crafting the CAA. As EPA observes in the Proposed Rule:

...to apply the statutory PSD and title V applicability thresholds to sources of GHG emissions would bring tens of thousands of small sources and modifications into the PSD program each year, and millions of small sources into the title V program. This extraordinary increase in the scope of the permitting programs, coupled with the resulting burdens on the small sources and on the permitting authorities, was not contemplated by Congress in enacting the PSD and title V programs.

As EPA regularly restated in its justification for its proposal, these consequences were not anticipated by Congress. A good example is:

The legislative history of the PSD provisions makes clear that Congress intended the PSD program to apply only to larger sources, and not to smaller sources, in light of the larger sources’ relatively greater ability to bear the costs of PSD and their greater responsibility for the pollution problems. In enacting the PSD requirements during the 1977 Clean Air Act Amendments, Congress, focused as it was on sources of conventional pollutants and not global warming pollutants, expected that the 100/250 tpy applicability thresholds would limit PSD to larger sources. But because very small sources emit CO₂ in quantities as low as 100/250 tpy, a literal application of the threshold to GHG emitters, without streamlining, would sweep in large numbers of small sources and subject them to the high costs of determining and meeting individualized BACT requirements, while also overwhelming permitting authorities’ capacity to process those applications.

The clear and overwhelmingly obvious reality that the Obama Administration EPA did not want to address is that these issues arise because Congress never intended to use the CAA to address GHG. EPA’s own actions – taken for reasons beyond any legal requirement – created the “absurd results” it sought to address. Much like the apocryphal boy who murders his parents and then seeks leniency from the courts because he is an orphan, EPA played the victimized agency that must deal with a regulatory crisis – a crisis of its own making.

Broad Policy Implications of Using the Clean Air Act - Regulating greenhouse gases under the CAA are driven almost exclusively by the United States (US) Supreme Court decision in *Massachusetts v. EPA*. While the Supreme Court seemed fascinated with the capaciousness of the definition of “air pollutant” under the CAA, it ultimately concluded that EPA “...must ground its reasons for action or inaction in the statute.” To make such a decision it is essential that EPA consider the legislative history of the CAA to determine intent and scope.

Clearly, when the CAA was enacted in 1970, Congress was focused on addressing air pollution in the US. Its concept of these pollutants consistently shows its interest focused on industrial and vehicle-specific emissions. It did not view the common compounds in the atmosphere – nitrogen, oxygen and carbon dioxide – as air pollutants. The role of carbon dioxide was viewed as beneficial – essential for plant growth and oxygen generation – a role that is largely ignored in the GHG ANPR. The issues of the time are reflected in the early criteria pollutants – sulfur oxides, nitrogen oxides, particulates, carbon monoxide and ozone. These were the areas where Congress sought to change the nature of American society.

While international interest in addressing air pollution was growing in 1970, its focus was on national actions needed to address local pollution. Global climate concerns were too vague and too uncertain to suggest that Congress had any intent to address it in the structure of the CAA. Moreover, if it had, the likely concern would have been threats of global cooling. Roughly a decade before CAA enactment, scientists largely feared that the world was heading toward a new ice age, a concern so broadly held that it was reflected in publications as diverse as the elementary school newspaper, *The Weekly Reader*. Similarly significant, when Congress did have an opportunity to consider using the CAA to address a global climate issue, it chose not to. By 1977, when the first major amendments to the CAA were enacted, stratospheric ozone threats were significant policy issues. However, rather than assert active policy provisions in the CAA, Congress chose to explicitly limit the CAA to analysis while addressing regulation through other laws. Only after international agreements on stratospheric ozone protection were developed did Congress provide the specific authorities of Title VI in the CAA to address them. This history affirms that Congress oriented the CAA to address US-limited issues.

EPA needs to recognize that Congress’ actions with regard to the authorities within the CAA show a level of detail not found in many laws. Congress set limits on the size of facilities to be regulated. It created entire programs to detail how nonattainment should be addressed for ozone and carbon monoxide. It defined the nature of the Prevention of Significant Deterioration (PSD) program. It reached into structuring the composition of gasoline and other vehicle fuels. To suggest that GHG regulation should fall out of these complex sections of the CAA in the ad hoc fashion that EPA presented is simply inconsistent with the history of the CAA.

One area particularly affected would be energy and national energy security. Given the unstable energy world, these are consequences that cannot be endured. When the CAA was enacted in 1970, America's oil production had just then peaked. The 1973 Arab Oil Embargo had yet to occur. The US imported 1.3 million barrels/day of crude oil compared to 11.3 million barrels/day of American production. Today, the U.S. is the largest producer of crude oil in the world. Future economic success means that more energy will be needed. The *World Energy Outlook* estimates that by 2050 world energy demand will increase by about 24 percent and about 50 percent of that demand will be supplied by oil and natural gas. Oil, natural gas, and coal will continue to be the primary sources of American energy. A GHG regulatory program needs to recognize this reality. Equally significant, it needs to recognize that constraining the development of American resources will result in greater risk to U.S. security – a consequence that is unacceptable in the current state of the world. **For these reasons, we believe that the CAA is not an appropriate law to regulate GHG nor was it ever intended to be.**

Nevertheless, the Obama Administration EPA chose to follow the path of pulling GHG under the scope of the CAA. The EPA then had to deal with the consequences. This tailoring proposal demonstrates how serious those consequences can be.

At the heart of the issue EPA tried to address in the tailoring proposal is clear statutory language defining the size of stationary sources subject to regulation under the CAA PSD and Title V programs. The Obama Administration EPA asked us to believe that it can ignore the fundamental structure of the CAA under two legal theories – “absurd results” and “administrative necessity”. The tailoring proposal explanation tries to weave a path through these concepts, but the justifications are not compelling. They rely on stretching relatively narrow instances in cases where consequences fall on agencies without the agencies' complicity. Here, EPA's situation differs dramatically. In the instant case, EPA's actions create the consequences it must address. While it is obvious that – if Congress had intended to address GHG under the CAA – Congress would not have set stationary source thresholds at 100 or 250 tons/year, the standard in the law is, in fact, what it is. Inescapably, one must conclude that Congress did not intend to regulate GHG under the CAA. But, despite pages of explanations about the disastrous consequences of the direct application of the CAA stationary source definitions to GHG, the Obama Administration EPA concluded that the solution is to contort little used regulatory theories to save the agency from its own actions. While we believe that the application of the CAA thresholds to GHG sources would be disastrous, we are not comforted that EPA can sustain the thresholds described in the tailoring proposal based on the thin justification it presents.

EPA would be far better positioned if it concluded that the PSD and Title V portions of the CAA are not triggered by the Title II endangerment determination than to follow the rationale of the tailoring proposal relying on tenuous legal theories of “absurd results” and “administrative necessity”.

We further questioned EPA’s sleight-of-hand approach on the regulatory costs of its actions. In the initial endangerment proposal, EPA argued that nothing in the finding would result in new regulatory burdens for PSD stationary sources. In this tailoring proposal, it justifies its actions on the disastrous consequences of the program on stationary sources under the PSD and Title V programs because of the endangerment determination. It, in fact, argues that the tailoring proposal will alleviate the otherwise severe burdens that would be imposed. The Title II endangerment determination does not have to create the consequences set forth in the tailoring proposal. EPA created vast confusion by being on both sides of the issue.

Similarly, we questioned the agency’s motives with regard to oil systems and natural gas systems that explore for and produce America’s oil and natural gas. EPA argued that Congress never intended to extend the regulatory requirements to the statutory stationary source sizes in the CAA. While we agree for different reasons, we opposed efforts within EPA for both GHG emissions and criteria pollutants to effectively revise the definition of stationary sources for oil production and natural gas operations. When EPA proposed reporting requirements under the Mandatory Reporting for Greenhouse Gases rule, it suggested that it was evaluating different facility definitions for onshore petroleum and natural gas production.

So, while EPA argues that it needs to tailor the definition of stationary sources to reduce its burden in this proposal, elsewhere, it is devising artificial approaches to alter the definitions of stationary source facilities solely for petroleum production and natural gas operations to increase the regulatory burden. Congress clearly spoke to the question of aggregating petroleum production and natural gas facilities under the CAA when it prohibited aggregation in the 1990 CAA Amendments. EPA should listen.

Congress did not intend the CAA to prohibit the discharge of small emissions of GHG. The EPA has misinterpreted the CAA. EPA declared that it must accomplish its task by unilaterally replacing Congress’s statutory volumetric thresholds with standards devised by the EPA itself, to be tightened or loosened at any future time in EPA’s sole discretion. These burdens and other absurd results invoked by the EPA are all problems of the EPA’s own making. They would not have occurred if EPA had not insisted upon construing the CAA in a manner unsupported by the Act’s text, purpose, structure, and history.

Energy Policy

In the last 200 years, global life expectancy has doubled. Extreme poverty has dropped from 90% of humanity to 10% and falling. The growth in human liberty and the dramatic increase in available energy are likely the two main catalysts for this tremendous progress.

We should avoid energy policies driven by a zero-sum philosophy for energy that says we must have less fossil fuel so we can have more of something else. History has shown that short-sighted energy plans often fail because they start with a preferred resource and work backwards.

According to the U.S. EPA and U.S. EIA, the U.S. decreased energy related CO₂ emissions more than any other country. America leads the world in environmental quality.

It doesn't make sense to place unnecessary political and legal obstacles in the way of responsible American oil and natural gas production.

The oil and gas industry has done such a good job of creating abundant, affordable, always-available energy that the world takes it for granted. Energy is so woven into our daily lives that few question whether it will be there, or where it comes from. Because energy is so reliable and available, the public believes they no longer require it.

We often encounter this paradox anytime we engage in a conversation about energy and the environment. Some folks assume that we don't need fossil fuels anymore. A stark example is anyone who wants to end oil and gas production while still benefitting from oil and gas based materials and fuels.

Economic prosperity allows countries to invest in new technologies and policies that improve not only environmental health but also the well-being of the people. Thus, if we want to continue to improve our relationship with the environment and human progress, we should be more supportive of economic growth and the entrepreneurship that drives it. We should all work together to ensure more people have access to safe, affordable, and reliable energy, no matter which state, nation, or continent they reside.

What is the best energy policy going forward? - Debate continues across the country on our nation's energy future. What is our best energy policy going forward?

Even during periods when much of the world suffers economic stagnation, most of us would agree that we still have a very high standard of living. Compared to previous generations, we are wealthier, healthier, have better technology, more mobility, and many more opportunities for a better life.

Several factors contribute to a higher standard of living, but one of the most important is access to reliable and inexpensive energy. Affordable energy is essential for almost every aspect of our modern lives. Affordable energy is needed to run the hospitals and laboratories that improve our health. Affordable energy is required to deliver electricity to our homes and put fuel in our vehicles. And it supports the millions of jobs associated with all of these things.

Concerns About Carbon - In general, the most affordable forms of energy come from fossil fuels, such as oil, natural gas, and coal. Compared to these energy sources, alternative fuels such as solar and wind power are considerably more expensive and less reliable.

Burning fossil fuels to generate electricity or provide power necessarily releases carbon dioxide (CO₂) into the atmosphere. Carbon dioxide is a gas we exhale every time we breathe. Erupting volcanoes, decaying trees, wildfires, and the animals on which we rely for food all emit CO₂. This by-product, which is essential for plant life and an unavoidable aspect of human life, is at the center of today's climate change controversies.

There is vigorous debate about what effects carbon emissions may or may not have on our future climate. Recent studies suggest that future warming is likely to be substantially lower than computer model-simulated projections on which many climate scientists rely. Using the temperature assumptions outlined by the United Nation's Intergovernmental Panel on Climate Change (IPCC), eliminating all CO₂ emissions in the U.S. immediately would only reduce global temperatures a negligible 0.07 degrees by 2050 and 0.2 degrees by 2100. But the damage to our economy and the well-being of American families would be enormous.

Those who believe that increased CO₂ emissions inevitably lead to global warming believe this change is directly attributable to the widespread use of fossil fuels. Because they believe further warming will have catastrophic effects, they have waged a war on carbon for many years. They advocate restricting carbon-based fuels in favor of subsidized alternative energy and encourage policymakers to make fossil fuels more expensive in hopes of discouraging their use.

Beware of Crocodile Tears - All too often state and federal proposals to tax carbon directly or launch new carbon tax schemes have much more to do with raising revenue than helping our environment. For those who prefer higher taxation to spending cuts, having an entirely new source of revenue is appealing. However, taxing carbon only takes more resources from the private sector to support swelling state and federal government.

Over the past 25 years, nearly 1.2 billion people around the world have been lifted out of poverty, while both malnutrition and the risk of death from air pollution have decreased. Taken together, these achievements are nothing short of a miracle. But, government's pursuit of hugely-expensive climate mitigation policies is threatening to slow momentum in reducing poverty. The German government, for example, plans to spend \$44 billion over 4 years to help the country cut its CO₂ emissions. Such measures will likely reduce the global rise in temperature by 0.00018 degrees in a hundred years – an immeasurably small gain for such a huge cost. History has shown conclusively that making people richer and less vulnerable is one of the best ways to strengthen societies' resilience to challenges such as climate threats.

Over 80% of the energy that the people of the world use to survive come from fossil fuels, because that is the cheapest, most plentiful, most reliable source ever developed. More than a billion people around the world face challenges for adequate food, clean water and protection from heat and cold due to a lack of access to energy. Anyone who cares about our environment and climate recognizes that cheap, plentiful, reliable energy is essential.

A Better Way - There is a better way. Just a few years ago, no one would have imagined the U.S. could increase production of oil and natural gas while cutting greenhouse gas emissions, which are now near 25-year lows. The oil and gas industry has proven that over the long-term it is possible to lead in energy production and in environmental stewardship. By focusing on more efficient use of energy, it is possible to lower emissions without imposing even more environmental restrictions. An American energy policy that values innovation over regulation can turn energy policy challenges into great opportunities for economic growth and energy security. This approach is not just good business, it's good stewardship and a much better strategy for improving the quality of life for all.

Conclusion

Former President Obama and former President Biden did everything they could to attack, weaken, or destroy domestic oil and natural gas production. They saw climate change as our nation's biggest threat and wanted to exercise control over the energy sources Americans use every day. Their actions created a legacy of failed energy policies.

We do not think regulatory agencies should be given the power to run roughshod over Congress and unilaterally implement regulations that have the force of law. Federal agencies should not use their regulating power to redraw the laws concerning fossil fuel emissions or the ability to explore or drill for new energy sources.

Energy innovation drives American progress. Real growth comes from individual Americans figuring out more efficient and reliable ways of doing things, not from regulatory mandates written in Washington, D.C.

The global climate debate remains a critical challenge for America. The EPA has desperately tried to unravel the overwhelming consequences of an ill-founded interpretation of the CAA. The CAA was never written with GHG emissions management as a part of its structure. EPA cannot twist the structure of the Act to create a sound regulatory approach.

IOGA stands in support of the EPA's proposal to reconsider the legal and scientific foundation of the Endangerment Finding and adopt a more balanced, transparent approach to emissions policy—one that recognizes the environmental progress achieved by the onshore oil and gas industry and the critical role it plays in keeping America powered.

The Endangerment Finding is the legal prerequisite used by the Obama and Biden Administrations to regulate greenhouse gas emissions. Absent this finding, EPA would lack statutory authority under Section 202(a) of the Clean Air Act (CAA) to prescribe standards for greenhouse gas emissions. This proposal, if finalized, is expected to save Americans \$54 billion in costs annually through the repeal of all greenhouse gas standards.

EPA should abandon the 2009 endangerment finding and greenhouse gas vehicle standards and seek Congressional action on global climate policy that will provide America with the energy security and the industrial development it needs to provide for future jobs and economic growth.

The U.S. has a unique opportunity to show the world how energy abundance can be used as a positive force to lift people up, which different than a philosophy of embracing a zero-emissions world.

For further information or any questions, please contact Edward Cross, Chief Executive Officer, Illinois Oil & Gas Association.

Sincerely,

A handwritten signature in black ink that reads "Edward P. Cross". The signature is written in a cursive, slightly stylized font.

Edward P. Cross, Chief Executive Officer
Illinois Oil & Gas Association