**Supplementary materials**

**Sources for Table 3**

| Company / Trade Association | Type | Administration | Year | Source |
| --- | --- | --- | --- | --- |
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| BP America, Inc. | Integrated | Trump | 2019 | BP. 2019. “BP Responds to FT Article on Methane Rules.” Bp Global. March 12, 2019. https://www.bp.com/en/global/corporate/news-and-insights/bp-responds-to-ft-article-on-methane-rules.html. |
| Shell Oil Company | Integrated | Trump | 2019 | Watkins, Gretchen. 2019. “Shell Supports the Direct Regulation of Methane – Here’s Why”. LinkedIn. March 13, 2019. https://www.linkedin.com/pulse/shell-supports-direct-regulation-methane-heres-why-gretchen-watkins/. |
| Equinor US Operations LLC | Upstream | Trump | 2019 | Sverdrup, Bjørn Otto. 2019. “Reducing Methane Emissions Is Part of Our Approach...” Tweet. *Twitter*. https://twitter.com/BSverdrup/status/1106634889347166209. |
| Total | Integrated | Trump | 2019 | Environmental Protection Agency 2019 |
| Pioneer Natural Resources USA, Inc | Upstream | Trump | 2019 | Environmental Protection Agency 2019 |
| Jonah Energy LLC | Upstream | Trump | 2019 | Environmental Protection Agency 2019 |
| Cimarex Energy Co. | Upstream | Trump | 2019 | Environmental Protection Agency 2019 |
| BHP | Upstream | Trump | 2019 | Environmental Protection Agency 2019 |
| Equitrans Midstream Corporation | Midstream | Trump | 2019 | Environmental Protection Agency 2019 |
| Dominion Energy Inc. | Midstream | Trump | 2019 | Environmental Protection Agency 2019 |
| ConocoPhillips | Integrated | Trump | 2020 | Chemnick, Jean. 2020. “Chevron Stands Alone with Trump on Methane Rollback.” EE News. September 8, 2020. https://subscriber.politicopro.com/article/eenews/2020/09/08/chevron-stands-alone-with-trump-on-methane-rollback-011252. |
| EQT | Upstream | Biden | 2021 | EQT Corporation. 2021. “EQT issues statement in support of reinstating federal methane rule.” April 15, 2021. https://www.prnewswire.com/news-releases/eqt-issues-statement-in-support-of-reinstating-federal-methane-rule-301269340.html |
| Occidental | Upstream | Biden | 2021 | Senator Angus King. 2021. “This week the Senate will be voting…” Tweet. Twitter. April 28, 2021. https://twitter.com/SenAngusKing/status/1387127038386098179 |
| Devon | Upstream | Biden | 2021 | Devon Energy. 2021. “We believe a meaningful reduction…” Tweet. Twitter. April 28, 2021. https://twitter.com/DevonEnergy/status/1387149378444533762 |
| Cheniere | LNG | Biden | 2021 | Cheniere Energy. 2021. “To maximize the climate benefits…” Tweet. Twitter. April 21, 2021. https://www.linkedin.com/posts/cheniere-energy-inc\_methane-lng-weareuslng-activity-6790369701974417409-D\_t2/ |
| INGAA | Trade | Biden | 2021 | INGAA. 2021. “INGAA statement on introduction of CRA resolution to reinstate NSPS OOOOa methane rule”. March 26, 2021. https://ingaa.org/ingaa-statement-on-introduction-of-cra-resolution-to-reinstate-nsps-ooooa-methane-rule/ |
| CLNG | Trade | Biden | 2021 | CLNG. 2021. “Letter to Chairman Pallone and Ranking Member Rodgers”. Environmental Defense Fund. April 27, 2021. https://www.edfaction.org/sites/edactionfund.org/files/2021-04/CLNG%20methane%20CRA%20letter%20house\_.pdf |
| API | Trade | Biden | 2021 | Sommers. 2021. “API stands ready to work with Biden Administration on methane regulation”. American Petroleum Institute. January 21, 2021. https://www.api.org/news-policy-and-issues/blog/2021/01/21/api-stands-ready-to-work-with-biden-administration-on-methane-regulation |

Source: Environmental Protection Agency. 2019. “Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review (Docket ID: EPA-HQ-OAR-2017-0757)”. <https://www.regulations.gov/docket/EPA-HQ-OAR-2017-0757>

**Detailed references for comments by oil and gas trade associations and companies on EPA methane regulations for new sources, 2015 and 2019**

|  |  |  |
| --- | --- | --- |
| Document | Organisation | Type |
| EPA-HQ-OAR-2010-0505-6239 | Pennsylvania Grade Crude Oil Coalition (PGCC) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6241 | CountryMark Energy Resources, LLC | Company |
| EPA-HQ-OAR-2010-0505-6603 | Trilogy Operating, Inc | Company |
| EPA-HQ-OAR-2010-0505-6703 | CrownQuest Operating, LLC | Company |
| EPA-HQ-OAR-2010-0505-6757 | Big Star Oil & Gas, LLC | Company |
| EPA-HQ-OAR-2010-0505-6758 | National Stripper Well Association (NSWA) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6788 | RK Petroleum Corporation | Company |
| EPA-HQ-OAR-2010-0505-6789 | North Dakota Petroleum Council (NDPC) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6790 | Discovery Operating, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6793 | Domestic Energy Producers Alliance (DEPA) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6797 | Veritas Energy, LLC | Company |
| EPA-HQ-OAR-2010-0505-6801 | Midland Energy, Inc. / Petroplex Energy, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6803 | Marcellus Shale Coalition (MSC) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6806 | Anadarko Petroleum Corporation | Company |
| EPA-HQ-OAR-2010-0505-6807 | Enterprise Products Partners L.P. | Company |
| EPA-HQ-OAR-2010-0505-6808 | Apache Corporation | Company |
| EPA-HQ-OAR-2010-0505-6809 | Alyeska Pipeline Service Corporation | Company |
| EPA-HQ-OAR-2010-0505-6810 | Oklahoma Independent Petroleum Association (OPIA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6811 | QEP Resources, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6814 | Paiute Pipeline Company | Company |
| EPA-HQ-OAR-2010-0505-6847 | Concho Resources Inc. | Company |
| EPA-HQ-OAR-2010-0505-6849 | Permian Basin Petroleum Association (PBPA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6850 | New Mexico Oil and Gas Association (NMOGA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6851 | Fasken Oil and Ranch, Ltd. | Company |
| EPA-HQ-OAR-2010-0505-6852 | Noble Energy, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6853 | Louisiana Mid-Continent Oil and Gas Association (LMOGA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6854 | Petroleum Association of Wyoming (PAW) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6857 | Kinder Morgan, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6859 | CONSOL Energy Inc. | Company |
| EPA-HQ-OAR-2010-0505-6869 | Diamondback E&P LLC | Company |
| EPA-HQ-OAR-2010-0505-6872 | Interstate Natural Gas Association of America (INGAA) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6879 | Alaska Oil & Gas Association (AOGA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6881 | GPA Midstream Association | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6882 | Legacy Reserves Operating LP | Company |
| EPA-HQ-OAR-2010-0505-6884 | American Petroleum Institute (API) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6889 | Colorado Oil & Gas Association (COGA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6892 | Shell US | Company |
| EPA-HQ-OAR-2010-0505-6893 | Texas Independent Producers and Royalty Owners Association (TIPRO) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6915 | Reliance Energy, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6920 | Natural Gas Supply Association (NGSA) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6921 | Ohio Oil & Gas Association (OOGA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6922 | Southwestern Energy (SWN) | Company |
| EPA-HQ-OAR-2010-0505-6925 | Hess Corporation | Company |
| EPA-HQ-OAR-2010-0505-6927 | Texas Pipeline Association (TPA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6929 | Chevron | Company |
| EPA-HQ-OAR-2010-0505-6930 | Western Energy Alliance | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6933 | Berkshire Hathaway Energy Pipeline Group (BHE) | Company |
| EPA-HQ-OAR-2010-0505-6935 | Antero Resources Corpoaration | Company |
| EPA-HQ-OAR-2010-0505-6939 | WBI Energy Transmission, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6941 | BP America, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6943 | Pennsylvania Independent Oil & Gas Association (PIOGA) | Trade association (state) |
| EPA-HQ-OAR-2010-0505-6946 | Dominion | Company |
| EPA-HQ-OAR-2010-0505-6947 | ConocoPhillips Alaska, Inc. (CPAI) | Company |
| EPA-HQ-OAR-2010-0505-6957 | MarkWest Energy Partners, L.P. | Company |
| EPA-HQ-OAR-2010-0505-6963 | Continental Resources, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6968 | BC Operating, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6978 | Patriot Resources, Inc. | Company |
| EPA-HQ-OAR-2010-0505-6983 | Independent Petroleum Association of America (IPAA) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6983 | American Exploration and Production Council (AXPC) | Trade association (national) |
| EPA-HQ-OAR-2010-0505-6996 | Plains All American Pipeline, LP | Company |
| EPA-HQ-OAR-2010-0505-6998 | Pioneer Natural Resources USA, Inc. | Company |
| EPA-HQ-OAR-2010-0505-7052 | DTE Energy | Company |
| EPA-HQ-OAR-2010-0505-7058 | Texas Oil & Gas Association (TXOGA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-0634 | Indiana Oil and Gas Association (INOGA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-0652 | Petroleum Association of Wyoming (PAW) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-0658 | Equinor US Operations LLC | Company |
| EPA-HQ-OAR-2017-0757-0659 | Kansas Independent Oil & Gas Association (KIOGA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-0660 | Equitrans Midstream Corporation | Company |
| EPA-HQ-OAR-2017-0757-0667 | GPA Midstream Association | Trade association (national) |
| EPA-HQ-OAR-2017-0757-1123 | Total | Company |
| EPA-HQ-OAR-2017-0757-1125 | Pioneer Natural Resources USA, Inc. | Company |
| EPA-HQ-OAR-2017-0757-1129 | Encana Oil & Gas (USA) Inc. | Company |
| EPA-HQ-OAR-2017-0757-1131 | Dominion | Company |
| EPA-HQ-OAR-2017-0757-1244 | Interstate Natural Gas Association of America (INGAA) | Trade association (national) |
| EPA-HQ-OAR-2017-0757-1417 | Shell US | Company |
| EPA-HQ-OAR-2017-0757-1421 | ExxonMobil | Company |
| EPA-HQ-OAR-2017-0757-1823 | Kentucky Oil and Gas Association (KOGA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-1825 | Jonah Energy LLC | Company |
| EPA-HQ-OAR-2017-0757-1837 | BP America, Inc. | Company |
| EPA-HQ-OAR-2017-0757-1838 | Cimarex Energy Co. | Company |
| EPA-HQ-OAR-2017-0757-1994 | DTE Energy | Company |
| EPA-HQ-OAR-2017-0757-2068 | Texas Pipeline Association (TPA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-2069 | Western Energy Alliance | Trade association (national) |
| EPA-HQ-OAR-2017-0757-2072 | Pennsylvania Independent Oil & Gas Association (PIOGA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-2074 | Domestic Energy Producers Alliance (DEPA) | Trade association (national) |
| EPA-HQ-OAR-2017-0757-2077 | Independent Petroleum Association of America (IPAA) | Trade association (national) |
| EPA-HQ-OAR-2017-0757-2078 | Texas Independent Producers and Royalty Owners Association (TIPRO) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-2090 | American Petroleum Institute (API) | Trade association (national) |
| EPA-HQ-OAR-2017-0757-2095 | Texas Oil & Gas Association (TXOGA) | Trade association (state) |
| EPA-HQ-OAR-2017-0757-2114 | BHP | Company |
| EPA-HQ-OAR-2017-0757-2655 | Illinois Oil & Gas Association (IOGA) | Trade association (state) |

Source: Environmental Protection Agency. 2015. “Oil and Natural Gas Sector -- New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, and Control Techniques Guidelines (Docket ID: EPA-HQ-OAR-2010-0505)”. <https://www.regulations.gov/docket/EPA-HQ-OAR-2010-0505>; Environmental Protection Agency. 2019. “Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review (Docket ID: EPA-HQ-OAR-2017-0757)”. <https://www.regulations.gov/docket/EPA-HQ-OAR-2017-0757>