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EPA Proposes Broad Revisions to 2024 Oil and Gas Methane Rule

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Background

On October 27, 2026, EPA proposed broad revisions to the March 2024 New Source Performance Standards and Emission Guidelines for methane and volatile organic compound (VOC) emissions from the oil and natural gas sector under 40 CFR part 60, Subparts OOOOb and OOOOc (the 2024 Rule). 91 Fed. Reg. 68,234 (Oct. 29, 2026) (the October 2026 Proposal).

This is EPA's latest step in reconsidering the 2024 Rule: in 2025, the agency extended several compliance deadlines and moved the super-emitter program and state plan deadlines to January 22, 2027. Then, in April 2026, EPA finalized narrower changes to temporary flaring and flare monitoring. The October 2026 Proposal goes much further, and EPA estimates it would save operators $45 billion.

Key Takeaways

- **Reduced requirements and more flexibility.** The October 2026 Proposal would reduce requirements for marginal or conventional well sites, rescind the third-party super-emitter program, and allow 95% control as an alternative to routing associated gas to a sales line.
- **Broader than it looks.** EPA is soliciting comment on more than 80 topics related to the proposed changes and comments on any other change to the 2024 Rule, so the final rule could reach further than the October 2026 Proposal.
- **Nothing changes yet.** The 2024 Rule and its extended deadlines remain in effect, including initial annual reports due November 30, 2026.
- **Comments are due December 16, 2026.** EPA will hold a virtual public hearing on November 16 at 10 a.m. ET.

What EPA Proposed

The October 2026 Proposal's principal changes:

Area	Proposed Change
Well site subcategorie	Two co-proposed options: reduced requirements for marginal well sites (15 barrels of oil equivalent per day or less over the prior 12 months) or for conventional

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s	wells. EPA will finalize only one. Marginal sites would use quarterly audio, visual, and olfactory inspections in place of instrument monitoring and low-bleed controllers in place of the zero-emission standard. Adding wells, refracturing, or adding equipment would end marginal status.
Super-emitter program	Rescinds the third-party detection and notification program before its January 22, 2027, start date, citing legal authority and effectiveness concerns. EPA also asks whether super-emitter events warrant separate regulation at all.
Associated gas	Restores 95% control (a flare or other control device) as an alternative to routing gas to a sales line, removing the need to demonstrate that a sales line is infeasible where gathering capacity does not exist.
Covers and closed vent systems	Splits the “no identifiable emissions” standard into design and operational requirements, with a 24-hour repair window and an investigative analysis after repeat events. Operators get a repair pathway instead of an automatic deviation.
Storage vessels	Bases applicability at centralized production facilities on design or permitted throughput rather than off-site well activity, with reassessment only when actual throughput exceeds the last potential-to-emit determination.
Control devices and monitoring	Adds flexibility for continuous pilot flames, flame-monitoring deviations, control device alerts, visible emissions testing, and temporary or backup equipment, and allows Appendix K optical gas imaging surveys at gas processing plants.
Other equipment	Modifies requirements for liquids unloading, process controllers, pumps, fugitive emissions, and equipment leaks at gas processing plants, plus technical corrections and clarifications.

What EPA Is Asking About

Table 34 of the October 2026 Proposal lists more than 80 specific questions about which EPA is soliciting comments on related to the proposed changes. In addition to those questions, EPA is soliciting comments on any and all changes that could be made to the 2024 Rule, including changes that could, in EPA's words, unleash U.S. energy

dominance or would relieve operators of unnecessary regulatory burdens.

If a 2024 Rule requirement is imposing real cost, the door is open to ask EPA to revise it—even though EPA did not propose that change. Additionally, because the final rule could change provisions the October 2026 Proposal does not mention, nothing in the 2024 Rule should be treated as settled. Of the more than 80 solicited questions, those most likely to matter to operators include:

- **Process controllers and storage vessels.** Whether to repeal the zero-emission standard for process controllers and allow routing to a control device, with added flexibility for sites without electricity; and whether to repeal or modify the 2024 “legally and practicably enforceable” criteria that determine when tanks and tank batteries are subject to the rule.
- **Marginal and conventional wells.** Whether conventional wells should receive reduced requirements regardless of production, whether to split marginal wells into two tiers at six barrels of oil equivalent per day, and whether to reduce leak-monitoring requirements further.
- **Monitoring, recordkeeping, and reporting.** Whether to repeal liquids unloading recordkeeping where operators can show no venting and, more broadly, whether inspection frequencies and documentation requirements cost more than they deliver.
- **The 2024 Rule's foundations.** Whether EPA's best-system-of-emission-reduction determinations across the 2024 Rule underestimated costs or overestimated reductions, and whether any other 2024 requirement is technically achievable, cost-effective, or legally justified.

What This Means for Operators

- **Keep complying.** The 2024 Rule and its extended deadlines remain in effect. A final rule—and the litigation likely to follow—stands between today and any relief.
- **The comment record will shape the final rule.** Operators with concerns about, or proposed changes to, the 2024 Rule have a unique opportunity to put those comments in front of the agency by December 16.
- **Model the subcategory options.** Operators with low-producing or conventional assets should determine which co-proposed option benefits them and whether planned workovers, refracturing, or equipment additions would forfeit marginal status.
- **Check your state obligations.** Federal relief does not alter state oil and gas requirements, such as Colorado's regulations. Operators should map which obligations are federal, which are state, and which are both before assuming any change in their compliance obligations.

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