



October 31, 2017

Mr. David A. Bloom
Acting Chief Financial Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Mail Code 2710A
Washington, DC 20460

RE: Draft Fiscal Years 2018-2022 Strategic Plan Docket ID No. EPA-HQ-OA-2017-0533-0001

Dear Mr. Bloom:

Western Energy Alliance appreciates the opportunity to provide comment on EPA's proposed strategic plan, which outlines a logical refocusing of the agency towards its core mission of providing a clean environment in a way that embraces the value of state partnerships and the rule of law. We are broadly supportive of the goals and strategies to achieve them laid out by EPA. We believe it reflects an appropriate set of priorities and identifies realistic actions for meeting them. However, we do believe that the strategic plan should more directly address two specific areas that are in need of reform.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents; the majority of which are small businesses with an average of fifteen employees.

First, while we appreciate the vision outlined by EPA to streamline reporting requirements through increased use of electronic reporting systems, we believe it would be wise to take a broader look at the information being reported to EPA. For example, programs like the Greenhouse Gas Reporting Program collect an enormous amount of information and in all likelihood, could be streamlined or simplified. We recommend EPA look at what information is currently collected, how it is being used, and whether the burden to the regulated community can be reduced without compromising the agency's core mission.

Second, we believe that the strategic plan should more clearly emphasize the goal of aligning state and federal regulatory requirements. The oil and natural gas industry is heavily regulated by states, EPA, and numerous other federal agencies. In some cases, these regulations may overlap or contain inconsistencies that can be a burden to the regulated community. We recommend that EPA explore specific solutions to regulatory

EPA Strategic Plan Comments

October 31, 2017

Page 2 of 2

overlap as a part of the effort to enhance state collaboration. Where possible, EPA should defer to states, as they often possess the on-the-ground expertise about conditions in particular areas.

We look forward to working with EPA as the agency reorients itself towards collaborative partnerships with states and the regulated community that emphasize predictability and transparency while maintaining the environmental protections we all value. Please consider Western Energy Alliance a resource on matters of regulatory reform.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Streams". The signature is fluid and cursive, with a large initial "R" and "S".

Ryan Streams