

EPA’s 2024 Revisions to Subpart W of the Greenhouse Gas Reporting Program

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Executive Summary

United States (U.S.) oil and gas operators are operating in a regulatory environment marked by evolving federal policy priorities and multi-jurisdictional expectations for greenhouse gas (GHG) reporting. While certain aspects of federal GHG regulation may be subject to review, existing requirements, including the U.S. Environmental Protection Agency’s (U.S. EPA’s) Subpart W reporting rule remain in effect, and compliance obligations continue to apply.

Beyond federal regulation, state programs, investor-driven disclosures, and international frameworks increasingly rely on empirical emissions data. As a result, operators are

expected to maintain GHG inventories that are transparent, defensible, and supported by appropriate measurement approaches. In an environment of ongoing regulatory change, accurate and measurement-based emissions data remain a critical foundation for compliance and informed decision-making.

The regulatory developments summarized in this paper indicate that, despite uncertainty and potential delay in certain federal GHG programs, the overall trajectory of methane regulation continues to emphasize improved emissions accuracy through empirical data collection. While federal rulemaking remains in flux, existing requirements under the GHGRP Subpart W, along with evolving state programs and international regulations, continue to rely on measurement-based emissions inventories.

In particular, state-level GHG reporting and verification programs and international frameworks such as the European Union Methane Regulation (EUMR) introduce requirements that extend beyond federal reporting obligations and, in some cases, apply irrespective of future federal regulatory outcomes. As a result, methane emissions measurement is increasingly relevant not only for regulatory compliance, but also for corporate disclosure and market access considerations.

Accordingly, the development of measurement-based methane inventories provides operators with a flexible approach to meeting overlapping regulatory and reporting requirements. Emissions data collected through empirical measurement can support compliance across multiple jurisdictions and programs, reducing the risk associated with regulatory changes while improving inventory transparency and consistency.

Regulatory Disclaimer

This document reflects regulatory requirements in effect or proposed as of the date of publication and may become outdated as rulemakings are finalized or revised.

Keywords

GHGRP, Subpart W, GHG, Measurement Informed Inventory, Methane, OGMP, EUMR

GHG Regulatory Overview

Introduction

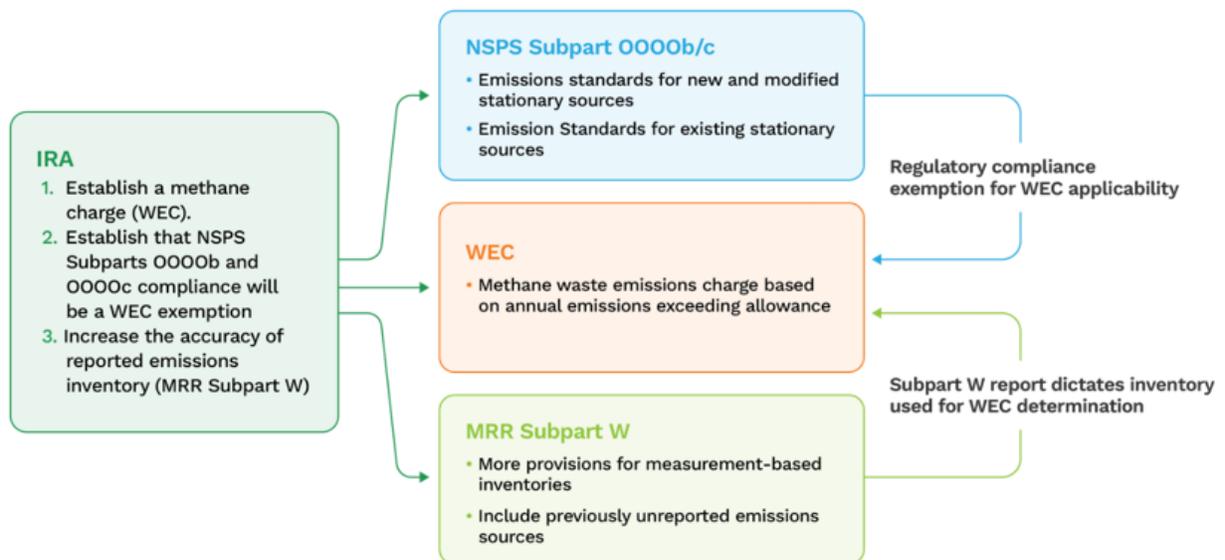
The Greenhouse Gas Reporting Program (GHGRP), as codified in Title 40 of the Code of Federal Regulations (40 CFR) Part 98, regulates greenhouse gas (GHG) reporting in the U.S.¹

¹ 40 C.F.R. pt. 98.

40 CFR Subpart W (Subpart W) specifically regulates GHG reporting from the Petroleum and Natural Gas systems. Subpart W was established in 2010, with several modifications since its inception.²

Most recently, technical revisions to Subpart W were made in May 2024 consistent with requirements in the Inflation Reduction Act of 2022 (IRA).^{3,4} The IRA included several provisions focused on climate and energy. It established the methane Waste Emissions Charge (WEC), which would be based on methane emissions reported under Subpart W.⁵ Compliance with New Source Performance Standard (NSPS) Subpart OOOOb and Emission Guideline (EG) OOOOc would provide an exemption from WEC applicability.⁶ The IRA also directed the United States Environmental Protection Agency (U.S. EPA) to develop rulemaking that increased the accuracy of the reported Subpart W inventory by requiring the use of empirical data in estimating emissions.⁷ Together, these rules created a strong and overlapping suite of regulations that created business incentives for accurate GHG reporting and GHG emissions mitigation for the oil and gas industry.

Figure 1. 2024 U.S. Methane Regulations Emphasizing Empirical Data and Accuracy



Since the IRA and 2024 Subpart W revisions, the Trump Administration has prioritized deregulation of the oil and gas industry. Implementation of the WEC is delayed by ten years; the delay was executed through the Congressional Review Act and associated

² Id. Subpart W.

³ 89 Fed. Reg. 42,062 (May 14, 2024).

⁴ Pub. L. No. 117-169, 136 Stat. 1818 (2022).

⁵ 42 U.S.C. § 7436.

⁶ 42 U.S.C. § 7437.

⁷ 42 U.S.C. § 7438.

revisions to the Clean Air Act (CAA).^{8,9} Several NSPS Subpart OOOOb and EG OOOOc compliance deadlines have been extended through a separate U.S. EPA action.¹⁰ The deadline for calendar year 2025 reporting under the GHGRP was recently extended from March 31, 2026, to October 30, 2026.¹¹ Although additional regulatory reconsideration is currently proposed, as of the writing of this document, the 2024 revisions to Subpart W remain in force.¹²

The following sections of this paper provide a summary of the current version of the GHGRP Subpart W, proposed regulatory reconsiderations, other drivers for accurate GHG emissions inventories, and suggestions for developing a measurement-based inventory amidst regulatory uncertainty.

2024 Revisions to Subpart W

The 2024 revisions to Subpart W are still in effect as of March 2026. Those revisions to increase the accuracy of GHG emissions associated with the oil and gas industry in two ways:

1. Including emissions from emission sources previously excluded from the emissions inventory; and
2. Allowing the use of empirical, often measurement-based, data in developing emissions estimates from several emission sources, those previously required to be reported and those added to the inventory with the 2024 revisions.

The revised calculation methodologies could optionally be integrated in the reporting year 2024 (RY2024) reports due on March 31, 2025, and are required to be integrated in the RY2025 report, currently due on October 30, 2026.^{13,14}

New Emission Sources

In an effort to account for all emissions from the oil and gas industry, EPA added reporting requirements for emission sources to the rule that were either previously not listed or were only required for specific industry segments.¹⁵

- Other large release events (criteria consistent with NSPS Subpart OOOOb super-emitter events)
- Additional compressor vents/operating modes

⁸ Pub. L. No. 119-2 (2025).

⁹ Clean Air Act § 136 (42 U.S.C. § 7436).

¹⁰ 90 Fed. Reg. 55,671 (Dec. 3, 2025).

¹¹ 91 Fed. Reg. 9712 (Feb. 27, 2026).

¹² 90 Fed. Reg. 44,591 (Sept. 6, 2025).

¹³ 91 Fed. Reg. 9712 (Feb. 27, 2026).

¹⁴ 89 Fed. Reg. 42,062 (May 14, 2024).

¹⁵ Id.

- Crankcase venting of compressor engines/turbines
- Nitrogen removal units
- Mud degassing
- Produced water storage tanks
- Blowdowns (for industry segments not previously included)
- Pneumatic devices (for industry segments not previously included)
- Tanks (for industry segments not previously included)

Options to Use Measurement Data in Emissions Estimates

Prior to the 2024 revision to Subpart W, a limited number of emission sources allowed emissions estimates to be based on empirical measurements (acid gas removal, blowdown vents, tanks, compressor vents, flares, combustion equipment).¹⁶ The current version of the rule adds measurement requirements or options for additional sources (pneumatic devices and pumps, associated natural gas, equipment leaks, other large releases).¹⁷ It also adds measurement options for the onshore production and gathering and boosting industry segments to use measurements to estimate emissions from compressor vents;¹⁸ previously, those segments were required to use an emission factor despite other segments being able to use measurements.

Summary by Emission Source

See below for U.S. EPA tabular summaries of emission sources to be reported per industry segment as well as calculation options per measurement source.¹⁹

¹⁶ Id.

¹⁷ Id.

¹⁸ 40 C.F.R. § 98.233(p)(10).

¹⁹ “Greenhouse Gas Reporting Program Revisions for Petroleum and Natural Gas Systems Final Amendments” (2024), <https://epa.gov> (search “Subpart W Rulemaking Resources”).

Figure 2. U.S. EPA Summary of Previously Covered Source Types

Additional Industry Segment Reporting for Previously Covered Source Types																					
* = These segments report combustion emissions under Subpart C Blue Check = new emissions source for the segment, effective for RY25																					
Industry Segment	Pneumatic Devices	Pneumatic Pumps	Acid Gas Removal	Dehydrators	Liquids Unloading	Completions & Workovers with HF	Completions & Workovers without HF	Blowdown Vents	Hydrocarbon Liquids Storage Tanks	Condensate Storage Tanks	Well Testing	Associated NG	Flare Stacks	Centrifugal Compressors	Reciprocating Compressors	Equipment Leaks	Offshore	EOR Injection Pumps	EOR CO2 In Hydrocarbon Liquids	Combustion Equipment	
Offshore Production																	✓				*
Onshore Production	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
NG Processing	✓		✓	✓				✓	✓				✓	✓	✓	✓					*
Transmission Compression	✓			✓				✓		✓			✓	✓	✓	✓					*
Underground Storage	✓			✓				✓		✓			✓	✓	✓	✓					*
LNG Storage			✓					✓					✓	✓	✓	✓					*
LNG Import/Export			✓					✓					✓	✓	✓	✓					*
NG Distribution	✓							✓								✓					✓
Gathering & Boosting	✓	✓	✓	✓				✓	✓				✓	✓	✓	✓					✓
Transmission Pipeline								✓								✓					

Figure 3. U.S. EPA Summary of New Source Types

New Emission Sources by Industry Segment (Effective for reporting year 2025 and later)					
Industry Segment	Mud Degassing	Produced Water Tanks	Nitrogen Removal Units	Crankcase Venting	Other Large Release Events
Offshore Production					✓
Onshore Production	✓	✓	✓	✓	✓
NG Processing		✓	✓	✓	✓
Transmission Compression				✓	✓
Underground Storage				✓	✓
LNG Storage			✓	✓	✓
LNG Import/ Export			✓	✓	✓
NG Distribution				✓	✓
Gathering & Boosting		✓	✓	✓	✓
Transmission Pipeline					✓

Figure 4. U.S. EPA Summary of Calculation Methods per Emission Source Type

Subpart W Calculation Method Types																			
	Pneumatic Devices	Pneumatic Pumps	Acid Gas Removal	Dehydrators	Liquids Unloading	Completions & Workovers with HF	Completions & Workovers without HF	Blowdown Vents	Hydrocarbon Liquids Storage Tanks	Condensate Storage Tanks	Well Testing	Associated NG	Flare Stacks	Centrifugal Compressors	Reciprocating Compressors	Equipment Leaks	EOR Injection Pumps	EOR CO ₂ In Hydrocarbon Liquids	Combustion Equipment
Direct Emissions Measurement	✓	✓	✓				✓	✓		✓		✓	✓	✓	✓	✓			✓
Measurement + Engineering Calculations			✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓		✓	✓
Engineering Calculations			✓	✓	✓	✓		✓	✓		✓	✓	✓				✓		✓
Emission Factors	✓	✓		✓			✓		✓					✓	✓	✓			✓

EOR = Enhanced Oil Recovery; HF = Hydraulic Fracturing; NG = Natural Gas

Red check marks indicate that the final rule includes a calculation methodology in a new calculation method category for that source type (e.g., final rule includes a direct measurement option where subpart W currently requires use of an emission factor).

Blue check marks indicate that the final rule adds a second type of calculation methodology in this category (e.g., adding a leaker emission factor option to the "Emission Factors" category for a source type that currently has population emission factors).

Current Status of Subpart W (January 2025)

U.S. EPA recently extended the CY2025 reporting deadline to October 30, 2026.²⁰

Previously, the U.S. EPA proposed to reconsider the GHGRP in September 2025.²¹ That proposed reconsideration, currently not finalized, proposes to remove all program obligations for many source categories and proposes the following changes to Subpart W, specifically:²²

- Extend the CY2025 reporting deadline to June 10, 2026;
- Suspend the Subpart W reporting requirements until RY2034 for all industry segments except natural gas distribution; and
- Remove GHGRP obligations for the natural gas distribution segment.

Subpart W was not proposed to be removed entirely because of the statutory requirements to use Subpart W data in the WEC, as previously described.²³ As WEC implementation was delayed by ten years through CRA, the suspension of Subpart W reporting requirements until 2034 is consistent with current WEC requirements.²⁴ GHGRP obligations are proposed

²⁰ 89 Fed. Reg. 42,062 (May 14, 2024).

²¹ 90 Fed. Reg. 44,591 (Sept. 6, 2025).

²² Id.

²³ Clean Air Act § 136 (42 U.S.C. § 7436).

²⁴ Id.

to be removed for the natural gas distribution segment as that segment is excluded from WEC applicability.

Note that GHGRP Subpart C, *General Stationary Fuel Combustion Sources*, was not proposed to be removed as part of the reconsideration, and several oil and gas industry segments report emissions from combustion sources under Subpart C. The September 2024 proposed rulemaking states that U.S. EPA expects to issue a separate notice of proposed rulemaking to address the question of how and where oil and gas operators should report combustion emissions, with respect to Subpart C reporting requirements.

The U.S. EPA received over 53,000 comments on the proposed GHGRP reconsideration and has not yet issued final rulemaking.²⁵

Revocation of GHG Endangerment and Cause or Contribute Findings

In addition to the proposed and finalized changes noted above, in August 2025 the U.S. EPA proposed a reconsideration of the 2009 endangerment and cause or contribute findings, and they were formally repealed in February 2026.^{26,27}

The 2009 findings concluded that (1) GHGs threaten public health and welfare and (2) GHGs from motor vehicles and engines cause or contribute to this endangerment.²⁸

Though the findings do not impart any requirements on stationary or mobile emissions sources, they are the foundation for federal climate regulations. The 2026 revocation of the GHG Endangerment Findings may provide an avenue for challenging stationary source regulations. Note that the repeal is already facing legal challenge.

Since the original 2009 findings, the U.S. EPA denied ten outside petitions from 2009-2010 and four outside petitions received from 2017-2019 to reconsider the findings.^{29,30} The U.S. Court of Appeals D.C. Circuit upheld the findings and the associated GHG regulations in 2021.³¹

Other Regulatory Drivers for Empirical Measurement

Despite the uncertainty associated with federal GHG requirements for oil and gas, other regulatory drivers for empirical GHG emissions detection and measurement exist for U.S. operators. On a state level, several states have implemented or proposed rules requiring or

²⁵ “Reconsideration of the Greenhouse Gas Reporting Program” created by the Environmental Protection Agency (2025), <https://www.regulations.gov>, (search “Docket EPA-HQ-OAR-2025-018”).

²⁶ 90 Fed. Reg. 36,288 (Aug. 1, 2025).

²⁷ 91 Fed. Reg. 7,686 (Feb. 18, 2026).

²⁸ 74 Fed. Reg. 66,496 (Dec. 15, 2009).

²⁹ 75 Fed. Reg. 49,556 (Aug. 13, 2010).

³⁰ 87 Fed. Rev. 25,412 (Apr. 22, 2022).

³¹ *Coalition for Responsible Regulation, Inc. v. EPA*, 684 F.3d 102 (D.C. Cir. 2012).

allowing for empirical data collection for GHG emissions reporting. See below for some examples, which are intended to be illustrative and not exhaustive.

- California
 - Climate Disclosure Legislation SB 253 requires disclosure of Scope 1, Scope 2, and Scope 3 GHG emissions by firms with global revenues over \$1 billion and who do business in California by 2027.³²
 - Health Protection Zone continuous monitoring in proximity to oil and gas operations through SB 1137.³³
- Colorado
 - GHG intensity verification as part of Regulation 7 requires measurement-based site-wide verification of submitted GHG inventory beginning in 2027.³⁴
- Illinois
 - Proposed Climate Corporate Accountability Act HB 3673 requires businesses with over \$1 billion in annual revenue and doing business in Illinois to report Scope 1, 2, and 3 GHG emissions to the state.³⁵
- New Mexico
 - Oil and gas operators report GHG emissions to the state using U.S. EPA Subpart W methodologies.³⁶
- New York
 - State GHG reporting regulation applying to multiple industries and due in June 2027.³⁷
 - Proposed Climate Corporate Data Accountability Act SB3456 requires businesses with over \$1 billion in annual revenue and doing business in New York to report Scope 1, 2, and 3 GHG emissions to the state.³⁸
- Washington
 - Oil and gas operators report GHG emissions to the state using U.S. EPA Subpart W methodologies.³⁹
 - Proposed Climate Disclosure Bill SB 6092 requires businesses with over \$1 million in annual revenue and substantial activity in Washington to report Scope 1, 2, and 3 GHG emissions to the state.⁴⁰

³² Cal. Sen. Bill 253, 2023–2024 Reg. Sess. (Cal. 2023).

³³ Cal. Sen. Bill 1137, 2021–2022 Reg. Sess. (Cal. 2022)

³⁴ 5 CCR 1001-26: Regulation 7, Part B, §§ VIII.F–VIII.G (eff. Jan. 1, 2025)

³⁵ Ill. H.B. 3673, 104th Gen. Assem. (2025).

³⁶ 20.2.73.300 NMAC.

³⁷ 6 NYCRR Part 253.

³⁸ N.Y. S.B. 3456, 2025–2026 Legis. Sess.

³⁹ WAC 173-441.

⁴⁰ Wash. Sen. Bill 6092 (2023–2024 Reg. Sess.)

Although the compliance deadlines associated with EG OOOOc have been delayed until 2027, states have begun the rulemaking process associated with state-specific requirements under the federal regulation. NSPS Subpart OOOOb requires extensive monitoring, and so will EG OOOOc. Pennsylvania and Texas have begun the EG OOOOc rulemaking process.^{41,42} Other states are in the information-gathering stage of rulemaking.

In addition to state requirements, U.S.-based operators are also impacted by international climate rulemaking that applies to energy imports, particularly the European Union Methane Regulation (EUMR). Published in 2024, the EUMR is a methane measurement, reporting, and verification (MRV)-based suite of requirements that applies to natural gas, oil, and coal placed on the European market.⁴³ Most notably for U.S.-based operators that are in the liquefied natural gas (LNG) supply chain, it establishes requirements for imported energies, meaning that companies located outside of the European Union (EU) are being requested to provide data required to be reported by EU-based energy importers.⁴⁴

The EUMR requirements for imported energy are phased.⁴⁵ The first annual MRV reports for CY2026 emissions are due in 2027 and require a measurement-based emissions inventory, source- and site-level emissions reconciliation, and independent verification. Beginning in August 2028, imported energy must also include a reported emissions intensity, and in 2030, an emissions intensity limit will apply. As summarized in the graphic below, information related to the emissions intensity calculation methodology and limit are forthcoming.⁴⁶ The EU Commission released a standardization request for the development of CEN and ISO standards consistent with EUMR guidelines.⁴⁷ Those documents are also forthcoming.

⁴¹ “Reducing Emissions of Methane and Other Pollution from Oil and Natural Gas Operations” (2025), <https://www.pa.gov>, (Search “OOOOc State Plan”).

⁴² “2024 OOOOc Rulemaking and State Plan for Existing Crude Oil and Natural Gas Facilities” (2024), <https://www.tceq.texas.gov>, (Search “OOOOc Rulemaking”).

⁴³ Regulation (EU) 2024/1787, OJ L.

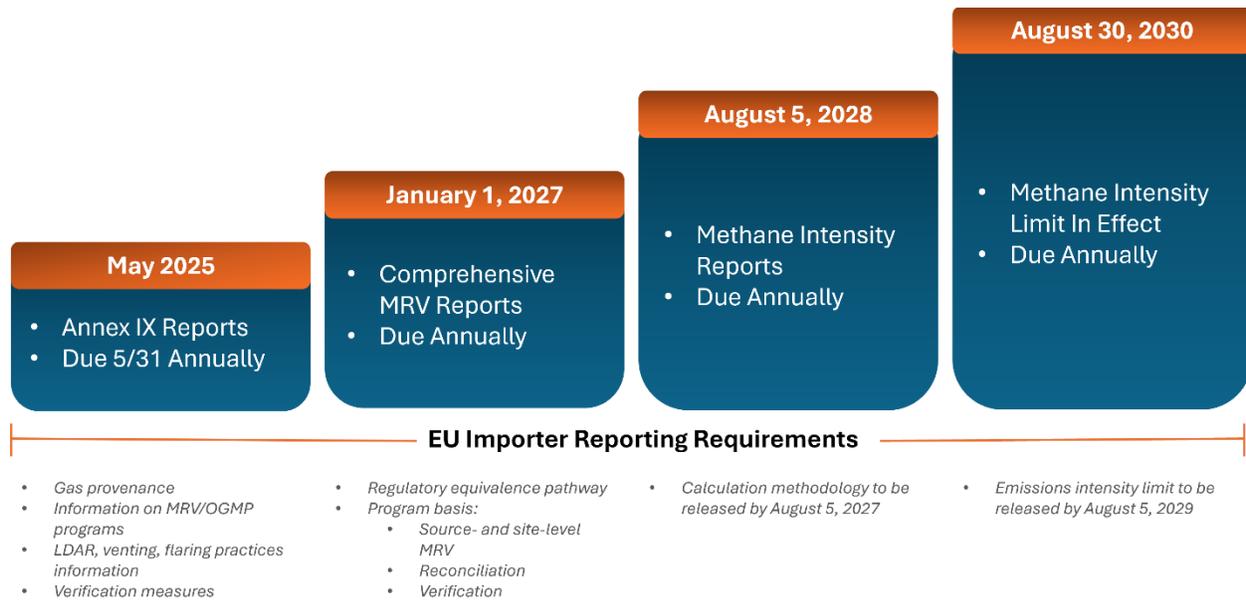
⁴⁴ Id. Article 27.

⁴⁵ Regulation (EU) 2024/1787, OJ L.

⁴⁶ Id. Articles 27 and 29.

⁴⁷ “Draft standardisation request as regards methane emissions quantification and mitigation in support of Regulation (EU) 2024/1787 on the reduction of methane emissions in the energy sector and amending Regulation on crude oil and natural gas” (2025), <https://euagenda.eu> (search “Standardisation request, EU 2024/1787”).

Figure 5. EUMR Stepwise Regulatory Deadlines Apply to Imported Natural Gas



The EUMR establishes three regulatory compliance equivalency pathways for imported energy:⁴⁸

1. Federal regulatory equivalency, when federal regulations are demonstrated to be consistent with EUMR requirements applying to EU operators. This pathway is unlikely to be an option for U.S. operators based on current federal deregulatory efforts.
2. Oil and Gas Methane Partnership (OGMP 2.0) Level 5, paired with independent verification.
3. Producer-specific methane MRV program approved by applicable EU governing body.

Although the U.S. has requested to be excluded from EUMR applicability, as of the writing of this document,⁴⁹ the rule has not been revised to exclude any geography. In addition, the EU Climate Omnibus introduced in December 2025 did not relax EUMR requirements.⁵⁰ The EU did clarify that certificates are an allowed compliance tracking mechanism.⁵¹ Despite the unknowns associated with the EUMR, initial MRV reports for imported LNG are due in January 2027.

⁴⁸ Regulation (EU) 2024/1787, OJ L., Article 28.

⁴⁹ “US demands EU exempt its gas from methane emissions law, document shows” (2025), <http://reuters.com> (Search “EU Methane Regulation”).

⁵⁰ European Commission Sustainability Omnibus I package (2025).

⁵¹ “EU offers simpler rules to comply with methane law after US pressure” (2025), <http://reuters.com> (Search “EU Methane Regulation”).

Developing a GHG Inventory Consistent with Applicable Drivers

U.S. federal, state, and global GHG regulations for the oil and gas industry are increasingly requiring the collection of empirical emissions data. When faced with requirements from several jurisdictions, especially during federal regulatory uncertainty, operators face challenges in determining which technologies and measurement programs to prioritize.

When selecting measurement programs to be used for regulatory compliance, operators should evaluate:

- Which measurement technologies are required or allowed by applicable regulations currently in force, noting that proposed reconsiderations do not impact applicable regulations until finalized;
- Whether applications for alternate approvals can be submitted;
- Program efficiency, for example whether measurements can be used to demonstrate efficiency with multiple applicable regulations; and
- Technology efficacy and application to the site and equipment being evaluated.

When considering Subpart W calculation methodologies allowed with the 2024 revisions, operators should consider the points below. Note that the highlighted examples are intended to be illustrative and not exhaustive.

- Subpart W allows several calculation methodologies for most emission sources; it requires measurement for a limited number of emission sources that vary per industry segment.
 - Example: reciprocating and centrifugal compressor vents for the natural gas processing, transmission compression, underground gas storage, LNG storage, and LNG import and export segments.⁵²
- If an operator is required to perform emissions detection and measurement activities for another federal regulation (i.e. NSPS Subpart OOOOb), that data must be used in the Subpart W calculations.
 - Examples: fugitive equipment leak surveys,⁵³ reciprocating compressor vent measurement in the onshore production or gathering and boosting industry segments⁵⁴
- If an operator elects to collect measurement data for a voluntary program (i.e. OGMP 2.0) or regulation, that measurement data must be used in the Subpart W calculations.

⁵² 40 C.F.R. § 98.233(o)-(p)

⁵³ 40 C.F.R. § 98.233(q)

⁵⁴ 40 C.F.R. § 98.233(p)(10)

- Examples: fugitive equipment leaks volumetric emission rates,⁵⁵ combustion sources incomplete combustion stack testing⁵⁶
- For reporting facilities in the onshore production and gathering and boosting industry segments, calculation methodologies using direct measurement shall be applied on a per-site basis.
 - Examples: pneumatic devices⁵⁷ and fugitive equipment leaks⁵⁸
- Technologies typically considered as site-level measurement tools (including satellites, fixed-wing aerial detectors, drones, vehicles, and stationary platforms) are permitted to be used for only one emission source type: other large release events.⁵⁹

Conclusion

U.S. oil and gas operators are navigating a period of regulatory uncertainty as federal policy priorities evolve. While some elements of GHG regulation may be subject to reconsideration, the majority of federal requirements for the oil and gas industry, including the EPA's Subpart W reporting rule, remain in effect. Operators must continue to comply with these obligations unless and until they are formally revised or rescinded.

Federal policy is only one part of an increasingly complex regulatory landscape. State programs, investor-driven disclosure requirements, and international frameworks, continue to place a growing emphasis on empirical emissions data. Across these drivers, GHG inventories are expected to be grounded in defensible, measurement-based data.

When developing a GHG measurement program, operators should select technologies and methodologies that align with current regulatory requirements, can adapt to anticipated changes, and are technically appropriate for the assets being monitored. Where possible, programs should be designed to efficiently support multiple reporting and compliance frameworks, reducing long-term risk and administrative burden.

By investing in a robust, transparent, and measurement-based emissions inventory, operators can ensure accurate representation of their operations, demonstrate credibility with regulators and stakeholders, and remain resilient in the face of evolving GHG regulations. As regulatory expectations continue to change, the ability to measure emissions accurately will be fundamental to compliance and informed decision-making.

⁵⁵ 40 C.F.R. §98.233(q)(3)

⁵⁶ 40 C.F.R. §98.233(z)(4)(i)

⁵⁷ 40 C.F.R. §98.233(a)(2)-(3)

⁵⁸ 40 C.F.R. §98.233(q)(3)

⁵⁹ 89 Fed. Reg. 42,062 (May 14, 2024).

About the Author

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As Montrose Environmental's Methane Sector Leader, Elizabeth leads complex, cross-disciplinary initiatives focused on methane quantification, mitigation, and regulatory strategy. With thirteen years of experience in air quality consulting, specializing in oil & gas and GHG accounting, she brings deep technical insight and a passion for data-driven emissions reduction. At Montrose, she guides global OGMP 2.0 initiatives, designs measurement pilots aligned with the revised U.S. EPA Subpart W rule and delivers impactful training on methane management and the current regulatory environment. Elizabeth also contributes to the IOGP working group developing ISO standards for EU Methane Regulation compliance, helping shape the future of methane management worldwide.

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