In conversations surrounding regulatory reform, I've noticed a common misperception that the oil and gas industry wants the freedom to do whatever it wants – *when*ever it wants – with no government intervention.

Let me just clear the air (pun intended) right now: this is not true. In fact, we *do* support sensible regulations that protect health, safety, and the environment. We care about our country and the American people. And that is exactly why we *don't* support regulations that destroy domestic jobs, risk national energy security, impede our nation's global competitiveness, and ultimately hurt the American consumer (that means you).

Take the RFS, for example. The RFS program poses one of the biggest regulatory challenges for American fuel manufacturers – and average citizens – for several reasons. First, government mandated biofuel blending distorts the free market for transportation fuels, which ultimately drives up costs and disadvantages customers. Second, increasing ethanol mandates is just not possible because higher ethanol blends are incompatible with the existing motor vehicle fleet. Third, the RFS program, taken with other fuel standards (lookin' at you, CAFE), would require costly infrastructure modifications that would inevitably fall on consumers' shoulders.

All this is a longwinded way of saying that the RFS is an unworkable program that ultimately disadvantages American consumers. Congress must therefore repeal or significantly reform the RFS program.

Then there's EPA's Risk Management Plan, recently revised in response to a fertilizer plant explosion in West, Texas (which was a result of arson, not chemical safety issues…but that's a discussion for another day). The revisions include requirements that compromise security, fail to enhance safety, and undermine the progress industry has already made under the existing RMP rule. In addition, the RMP rule imposes significant new requirements on top of OSHA's PSM rules.

In response to industry petitions (such as this one and this one), EPA proposed to delay the rule's effective date by *almost two years* in order to reconsider the regulation. We hope the new Administration will recognize and fix the rule's significant shortcomings.

In addition, EPA's recent lowering of the ozone national ambient air quality standard to 70 ppb poses further economic problems. For example, it could force many regions out of attainment with the new standard due to background ozone levels. This in turn would make it increasingly difficult to permit new facilities or modify existing facilities in non-attainment areas, preventing new construction, limiting economic growth, and destroying American jobs.

EPA should delay implementation of the 2015 standard until 2025 to ensure that states can achieve the previous ozone standard of 75 ppb before lowering it even further. This would help prevent economic hardship resulting from the rule while still maintaining intended air quality improvements.

Last but not least is EPA's Refinery Sector Rule. We do *not* support EPA's implementation of standards

applicable to periods of SSM, the 2 psig requirement for depressurizing delayed cokers, and the new fenceline monitoring regulations because EPA has found insufficient risk to justify their inclusion. In addition, we believe EPA should reject petitions for reconsideration filed by various environmental groups, and retain the challenged provisions (such as the provision allowing refineries to reduce the frequency of fenceline monitoring if they consistently record very low levels of benzene).

We need regulations that protect public health, safety, and the environment without sacrificing domestic jobs, national energy security, or our nation's competitiveness in the global marketplace. Over the coming months, the Administration must work closely with Congress to ensure these goals are met. At the end of the day, this will benefit the average American consumer and our country overall.

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