United States Senate

WASHINGTON, DC 20510

November 3, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

The Honorable Scott Bessent
Secretary
U.S. Department of the Treasury
1500 Pennsylvania Avenue N.W.
Washington, DC 20220

We write to express our concern regarding the Environmental Protection Agency (EPA)'s proposal to stop collecting information under the Greenhouse Gas Reporting Program (GHGRP) and suspend reporting under Subpart W of the GHGRP for ten years. In the fifteen years of the GHGRP's existence, American industry and energy production has used this program to demonstrate where we are cleaner than the global competition. For instance, domestic liquid natural gas producers have come to rely on the GHGRP to provide a verifiable accounting of their emissions, which facilitates participation in international markets.[1] American industry can also point to the GHGRP to show that it has grown cleaner and more efficient over time. While Republican and Democratic Senators may not always agree on EPA actions, we support the collection of information that improves the global competitiveness of American industry.

For the fast-growing carbon capture, utilization, and storage (CCUS) industry, the GHGRP is essential for claiming the tax credit under Section 45Q of the U.S. Tax Code.[2] Over the last decade, improvements to this credit have been made by both Republican and Democratic administrations. Most recently, Congress enhanced the value of the 45Q tax credit in the One Big Beautiful Bill Act (OBBBA), but the proposed changes to the GHGRP introduce significant uncertainty in industry's ability to claim this credit. The United States is currently the world leader in carbon management, with enough installed capacity to capture over 20 million metric tons of carbon per year.[3] The EPA under your leadership has supported deployment of CCUS, including by permitting and approving state primacy to regulate Class VI wells, which your EPA has noted is an opportunity to boost energy independence and dominance. We are poised to capitalize on this advantage, spurred on by the 45Q tax credit, which provides a federal tax credit for each metric ton of carbon dioxide captured and sequestered or re-used for a qualified purpose, including enhanced oil recovery. Developers have already invested $77.5 billion in capital expenditures for existing and near-term CCUS projects across the nation[4]—an investment with the potential for

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[1] "Oil & Gas Sector Cites Global Markets as Reason to Retain GHG Reporting", *Inside EPA's Climate Extra* (Oct. 10, 2025), https://insideepa.com/climate-news/oil-gas-sector-cites-global-markets-reason-retain-ghg-reporting?s=na.

[2] 26 U.S.C. § 45Q.

[3] Mathias Zacarias, "The United States Risks Losing Its Carbon Capture Advantage", CENTER FOR STRATEGIC & INTERNATIONAL STUDIES (Jul. 28, 2025), https://www.csis.org/analysis/united-states-risks-losing-its-carbon-capture-advantage; U.S. DEPARTMENT OF ENERGY, "Pathways to Commercial Liftoff: Carbon Management" (Apr. 2023), https://yardsale.energy/wp-content/uploads/2025/05/DOE-Liftoff-Carbon-Managment-2023.pdf.

[4] CARBON CAPTURE COALITION, "EPA Proposes Damaging Repeal of the Greenhouse Gas Reporting Program, which Underpins Public Confidence in the 45Q Tax Credit" (Sep. 12, 2025), https://carboncapturecoalition.org/epa-

significant job creation—but the EPA's proposal jeopardizes this growth opportunity. The EPA's proposal rightly acknowledges the criticality of the reporting program to the viability of this tax credit. While other reporting measures could be put in place, the decision to cut this program can not be made in a vacuum. Repealing it without a clear alternative in place will put existing investments in flux and stymy future American leadership in CCUS deployment. This would mean less domestic energy production, which is contrary to the OBBBA and multiple preceding statutes prioritizing the deployment of this nascent technology.

CCUS is not the only industry to benefit directly from the GHGRP. American-produced liquefied natural gas (LNG) is some of the cleanest in the world, which gives the United States a key competitive edge in the global market. The European Union requires verifiable methane data for imported fuels,[5] and worldwide, most LNG is traded through long-term contracts, which increasingly include emissions reporting requirements.[6] Thus, as the American Petroleum Institute stated at a recent EPA hearing on the planned GHGRP reconsideration, "[m]aintaining credible reporting is essential to sustaining U.S. competitiveness and ensuring that U.S. [LNG]…remains a cornerstone of global energy security."[7] EPA's proposal to suspend Subpart W reporting requirements for ten years would be a mistake, API explained, because it would "make it harder for U.S. producers to meet the rising demand for transparent, verifiable emissions data in global markets."[8]

EPA projects that discontinuing the GHGRP will provide between $2 and $2.4 billion in cost savings over the next ten years.[9] This amount is far outweighed by the capital jeopardized by EPA's action; including but not limited to the $77.5 billion invested in existing and near-term CCUS projects, the $30 billion in tax revenues to American industry under 45Q before OBBBA, with billions more expected after OBBBA,[10] and the billions of cubic feet of LNG, valued at over 2 billion dollars per day, exported from the United States.[11] Moreover, absent the GHGRP some industries will likely take on the additional cost of building their own reporting systems to meet consumer demand—and these individual systems will lack the verifiability of the federal system.

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proposes-damaging-repeal-of-the-greenhouse-gas-reporting-program-which-underpins-public-confidence-in-the-45q-tax-credit/.

[5] EUROPEAN COMMISSION, "Methane Emissions", https://energy.ec.europa.eu/topics/carbon-management-and-fossil-fuels/methane-emissions_en.

[6] Erin M. Blanton & Samer Mosis, "The Carbon-Neutral LNG Market: Creating a Framework for Real Emissions Reductions", COLUMBIA SIPA CENTER ON GLOBAL ENERGY POLICY (July 8, 2021), https://www.energypolicy.columbia.edu/publications/carbon-neutral-lng-market-creating-framework-real-emissions-reductions/#:~:text=In%20practice%20these%20two%20approaches,%2C%20such%20as%20power%20plants).

[7] "Oil & Gas Sector Cites Global Markets as Reason to Retain GHG Reporting", *Inside EPA's Climate Extra* (Oct. 10, 2025), https://insideepa.com/climate-news/oil-gas-sector-cites-global-markets-reason-retain-ghg-reporting?s=na.

[8] *Id.*

[9] *Reconsideration of the Greenhouse Gas Reporting Program*, 90 Fed. Reg. 44591, 44604 (Sep. 16, 2025), https://www.govinfo.gov/content/pkg/FR-2025-09-16/pdf/2025-17923.pdf.

[10] Angela C. Jones and Donald J. Marples, "The Section 45Q Tax Credit for Carbon Sequestration", CONGRESSIONAL RESEARCH SERVICE (Aug. 25, 2023), https://www.congress.gov/crs-product/IF11455.

[11] U.S. ENERGY INFORMATION ADMINISTRATION, "The United States Remained the World's Largest Liquefied Natural Gas Exporter in 2024" (Mar. 27, 2025), https://www.eia.gov/todayinenergy/detail.php?id=64844.

The GHGRP supports American industry, bolsters the competitiveness of domestic goods on the international market, and saves time and money. While we support exploring opportunities for reducing redundant or unnecessary reporting, dismantling this program without a clear, understandable replacement to address the aforementioned concerns would be a mistake.

We ask that you withdraw your proposed reconsideration of the GHGRP.

Sincerely,

Sheldon Whitehouse
United States Senator
Ranking Member
Committee on Environment
and Public Works

Kevin Cramer
United States Senator