



Environmental Series: *Clearing the Air on the Clean Air Act*



EPA's Greenhouse Gas Reporting Program Remains in Effect Despite Proposed Rollback

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The Environmental Protection Agency's ("EPA") mandatory [Greenhouse Gas Reporting Program](#) ("GHGRP") remains in effect today, notwithstanding EPA's ongoing effort to reconsider and substantially reduce the program. Although EPA has proposed eliminating most GHGRP source categories and suspending reporting obligations for much of the oil and gas sector, those proposals have not been finalized. Accordingly, facilities currently subject to GHGRP reporting should continue to treat existing reporting obligations as fully enforceable unless and until EPA takes final regulatory action.

In March 2025, EPA [announced](#) what it called the "greatest and most consequential day of deregulation in U.S. history." EPA said it would begin reconsidering 31 regulations including the GHGRP. While suspension of most GHGRP requirements is currently under proposal by the EPA, reporting obligations for Subpart W (Petroleum and Natural Gas Systems) remain in place and are currently scheduled for October 2026.

The "Pulse Check" on the Greenhouse Gas Reporting Program

EPA finalized the initial GHGRP in 2009. Between 2009 and 2024, the program expanded significantly, adding new sectors and subparts. In September 2025, however, EPA proposed a rule to reconsider GHGRP reporting obligations for [46 of its 47 source categories](#) and substantially reducing reporting burdens on the sole surviving category, [Subpart W](#).

Under the proposal, facilities within those 46 source categories would no longer be required to report GHG emissions after the 2024 reporting year. For Subpart W, EPA proposed to eliminate reporting obligations for the natural gas distribution segment (with 2024 as its final reporting year), while suspending mandatory reporting for all other segments until 2034.

In February 2026, EPA extended the [GHGRP reporting deadline](#) from March 31, 2026, to October 30, 2026, citing the need for flexibility while the reconsideration continues. These proposed changes have not been finalized and therefore do not alter current compliance obligations. Operators remain subject to their current GHGRP compliance and reporting obligations.

Why the Current Status Matters

As of the date of this Alert, EPA has not finalized its proposed reconsideration of the GHGRP and has not announced any further extension of the October 30, 2026, deadline. Absent further EPA action, operators subject to GHGRP reporting requirements should plan to submit their 2025 annual GHG

reports by October 30, 2026. Importantly, a proposed rule has no legal effect unless and until EPA adopts a final rule through the applicable rulemaking process.

What Operators Should Be Doing Now

- Plan for a GHGRP deadline of October 30, 2026.
- Determine which of your facilities are required to report under GHGRP.
- Consult legal counsel and technical support for GHGRP assistance.
- Collect and preserve documentation and data supporting emission estimates.
- Maintain GHG compliance and reporting programs.
- Monitor EPA's rulemaking and GHGRP announcements closely.

Key Takeaways

EPA's reconsideration of the GHGRP creates significant uncertainty, but it does not eliminate current reporting obligations. Operators should plan for compliance with the October 30, 2026 reporting deadline, confirm which facilities remain subject to GHGRP, and ensure that the data, calculations, and supporting documentation underlying reported emissions are complete, accurate, and well-documented. Until EPA finalizes changes, operators should not treat proposed regulatory relief as final.

For assistance with regulatory compliance, permitting, enforcement, and related matters, please contact any member of the [Environmental and Natural Resources Team](#).



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