

10/31/2025

**Subject:** Comment on Docket ID No. EPA HQ OAR 2025 0186 – Reconsideration of the Greenhouse Gas Reporting Program

To Whom It May Concern:

The North Dakota Ethanol Producers Association (NDEPA) opposes the EPA's proposed rule to eliminate greenhouse gas (GHG) reporting requirements for 46 of 47 source categories under the Greenhouse Gas Reporting Program (GHGRP) as currently written. While we understand the EPA's intent to simplify reporting, the proposed changes would create significant uncertainty for ongoing and future carbon capture and storage (CCS) projects that are essential to the ethanol industry's success and to advance national decarbonization goals.

Subpart RR is fundamental to the federal Section 45Q tax credit, which drives CCS investment and innovation. Treasury and IRS guidance depend on GHGRP data to verify the amount of CO<sub>2</sub> captured and permanently stored. Removing Subpart RR without a clear and coordinated alternative would disrupt this process, jeopardize existing investment and slow progress in low-carbon fuel production across rural America.

North Dakota's ethanol producers are national leaders in developing and deploying CCS technology. Facilities such as Gevo North Dakota (Previously Red Trail Energy) in Richardton, ND and Blue Flint Ethanol in Underwood, ND have made significant investments in infrastructure and EPA-approved MRV (Monitoring, Reporting, and Verification) plans. Repealing these requirements would invalidate approved MRV plans, discourage new investment, and diminish ethanol's role as a low-carbon, homegrown fuel under the Renewable Fuel Standard and emerging clean fuel markets.

NDEPA respectfully urges the EPA to:

1. Retain Subpart RR and related carbon reporting requirements essential for 45Q eligibility, or establish a clear, coordinated alternative process.
2. Coordinate with Treasury and IRS to ensure continuity for existing and future CCS projects.
3. Support ethanol producers who are leading the nation in cost-effective carbon reduction.

North Dakota's ethanol producers are committed to advancing solutions that strengthen rural economies and reduce carbon intensity. We would be supportive of revisions to the proposed rule that address these critical issues and maintain the GHGRP framework that ensures accountability, investment, and continued progress.

Thank you for your consideration.

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