

# The PIOGA Press

The monthly newsletter of the  
Pennsylvania Independent Oil & Gas Association  
June 2025 • Issue 182

## DEP's OOOOc Plan Explained: Risks, Requirements & Next Steps

On May 31, 2025, the Pennsylvania Department of Environmental Protection (DEP) released its long-awaited draft plan for implementing the federal EPA's Quad OOOOc methane regulations. The 193-page proposal sets a rapid timeline toward finalization—potentially by March 9, 2026—and will significantly impact oil and gas operations across the Commonwealth.

PIOGA has been preparing for this moment for months, engaging directly with lawmakers, DEP officials, and federal agencies to advocate for our members. Now, it's time for every segment of the industry to get informed, get engaged, and make your voice heard.

### PIOGA's OOOOc Info Sheet

To help members navigate the complexities of the DEP's proposal, PIOGA has released a comprehensive Info Sheet that breaks down what the plan includes, what comes next, and how it could affect your operations.

**Read the Info Sheet:** [https://pioga.org/publication\\_file/OOOOc-Infosheet.pdf](https://pioga.org/publication_file/OOOOc-Infosheet.pdf)

**Draft Plan:** <https://greenport.pa.gov/elibrary/GetFolder?FolderID=1646351>

### Virtual Seminars: Get Prepared

PIOGA is offering free virtual seminars to help members unpack the DEP plan and understand what compliance means. These sessions are a must-attend for anyone seeking clarity on how this rule affects your business.

**Sign up - PIOGA's virtual seminar** or please reach out to Meghan Keely ([meghan@pioga.org](mailto:meghan@pioga.org)) for the sign-up link.



### We're on the Front Lines – Are You?

PIOGA is actively fighting for our members:

- Six full days spent in Harrisburg and D.C. in the last two months
- Meetings with 7 legislative offices, including both PA senators
- Ongoing advocacy focused on OOOOc regulations and orphan well plugging
- Returning to Harrisburg on June 24 for Natural Gas Day, and again on July 7 for the public hearing at DEP Headquarters
- Attendance at critical hearings:
  - **June 30** – Washington & Jefferson College
  - **July 1** – Drake Well Museum
  - **July 7** – DEP Headquarters (Harrisburg)
  - **July 10** – Virtual hearing



PIOGA staff will be attending hearings to represent our members. Pappasergi will attend the June 30 hearing; Weaver will be at the July 1 hearing in Titusville.

### What You Can Do Right Now

**Submit Comments by June 13:** PIOGA encourages every member to submit comments or testimony. Use our Info Sheet as a starting point to craft your message.

*Continued on page 3*

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## PIOGA Member Spotlight Billman Geologic Consultants, Inc.

For over 32 years, Billman Geologic Consultants, Inc. has been a cornerstone in Pennsylvania's oil and gas sector, providing expert geological services across the Appalachian Basin. Founded and led by Dan A. Billman, a registered Professional Geologist (PG) and Certified Petroleum Geologist (CPG), the firm specializes in:

- Petroleum geology and prospect evaluations
- Wellsite formation evaluations
- Gas storage feasibility and brine disposal well siting
- Geologic and economic reviews for exploration prospects.

Billman Geologic Consultants has played a pivotal role in the development of major shale plays, including the Marcellus and Utica formations. Notably, Billman served as a senior geologic advisor to Rice Energy during its formative years, contributing to the company's growth from inception to its eventual public offering and sale. His extensive experience encompasses both unconventional and legacy conventional reservoirs throughout the Appalachian Basin.

Beyond his consulting work, Billman is an active leader in the geologic community. He has held multiple leadership positions with the American Association of Petroleum Geologists (AAPG) and the Pittsburgh Association of Petroleum Geologists, and currently serves on the board of PIOGA. Also, Dan serves on the Carnegie Museum of Natural History Citizen Advisory Board and on the Visiting Committee of the Eberly College of Arts and Sciences for West Virginia University.

Based in Houston, PA, Billman Geologic Consultants continues to support the industry with scientific expertise and a commitment to excellence.

**Website:** <https://billmangeologic.com/>



## OOOOc *Continued from page 1*

**Attend a Public Hearing:** Let your concerns be heard in person or virtually. This is your opportunity to protect your operation and Pennsylvania's energy future.

**Stay Engaged:** The path forward depends on active industry participation—and that starts with you.

- **Review** the summary, action plan, and seminar/comment form already shared (reach out to [meghan@pioga.org](mailto:meghan@pioga.org) if you need a link to the documents)
- **Follow** PIOGA on social media and check our website frequently for ongoing updates, resources, and alerts.
- **Attend** PIOGA's informational seminars to better understand the DEP's proposed plan and how it impacts your operations.
- **Speak up.** Submit your comments. Your input matters. Regulators need to hear directly from those who will be most affected. Use PIOGA's materials as a foundation to craft your own testimony and contribute to the public record.

Now is not the time to sit on the sidelines. If we want a workable, balanced path forward for Pennsylvania's oil and gas industry, we must stand together, speak out, and stay involved.

### This Is a Hill to Die On

The proposed DEP plan is a near mirror of the federal rule—and it's poised to impact every operator in the state. There may still be room for changes, but that window is closing fast.

PIOGA is working directly with lawmakers and regulators to shape a more realistic and workable approach. But we need your voice to amplify ours. Industry-wide, this is a defining moment.

**From Daniel Weaver, PIOGA President & Executive Director:** *"The proposed OOOOc plan released by the DEP will send shockwaves across the entire industry, impacting not just operators but all stakeholders involved. It is crucial that we take immediate action by submitting robust and constructive testimony and comments, ensuring that all segments of the industry can thrive beyond March 2029. The time to engage is now; tomorrow is uncertain. If you're not part of the solution, you risk being part of the problem. Let's rise to the challenge and make our voices heard."* — Daniel Weaver.

Watch your inbox and PIOGA's social channels for regular updates, comment templates, and alerts. We will be releasing updates at least once a week as this issue evolves. ■



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## PIOGA Clay Shoot Hits the Mark at Promise Land Hunting Preserve

The 2025 PIOGA Clay Shoot, held Thursday, June 12 at Promise Land Hunting Preserve in Freeport, PA, was a resounding success—bringing together outdoor enthusiasts, industry professionals, and sponsors for a full day of camaraderie, competition, and celebration of Pennsylvania's energy community.

This year's event was PIOGA's only clay shoot of the year, and it didn't disappoint. With two flights, shooters enjoyed a beautiful day on a well-maintained course, taking their best shots across 100 sporting clays per participant.

Both the AM and PM flights enjoyed a day of competitive shooting and plenty of friendly banter. Participants from each flight were treated to a catered buffet, making for an enjoyable and social experience.

In total, the event welcomed 120 shooters, along with additional guests and volunteers, making for a lively and engaging day outdoors.

🏆 Congratulations to Our Top Shooters: (places based on Lewis Class System)

- **1st Place:** (AM Flight) Tim Botsford with an 86; (PM Flight) Brian Verweist with an 86.
- **2nd Place:** (AM Flight) Paul Kanouff; (PM Flight) Andrea Taylorson-Collins
- **3rd Place:** (AM Flight) Weston Allen; (PM Flight) Clarissa Hawk.

🙌 Special Thanks to Our Sponsors:

• **Blast Masters:** American Refining Group, Inc.; The Reschini Group; Young & Associates; Moody and Associates, Inc.; MRC Global; Bluewater Inc.; PSB Industries; Toy Pipeline Contractors, Inc.; SPM Oil & Gas; Cleveland Brothers; Bittering Dilling; TEAM; Evergreen North America

• **Clay Pigeon Pluckers:** KLX Energy Services

• **Aiming for Laughs:** Mountain State Resources & Equipment Corp.

These organizations helped make the event a reality through their generous support and continued commitment to PIOGA.

Thank you to everyone who joined us—we look forward to seeing you back on the course in 2026! For more event photos or to get involved with upcoming PIOGA activities, visit [www.pioga.org](http://www.pioga.org).



**BLAST MASTERS** sponsorship



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## Coming Home to History: PIOGA Volunteers at the Petroleum History Institute

Last month, PIOGA's Meghan Keely had the unique opportunity to step into the past while supporting the future of oil and gas heritage preservation. She volunteered at the Petroleum History Institute (PHI), headquartered in the historic Transit Building in Oil City, Pa.—a cornerstone of the region where the modern petroleum industry was born.

Meghan spent the day alongside two fellow volunteers, helping organize the Institute's vast collection of historical documents, photographs, and industry memorabilia. In doing so, she not only contributed to the ongoing work of the Institute but also gained a deeper understanding of the people, places, and innovations that have shaped oil and gas development in Northwest Pennsylvania and beyond.

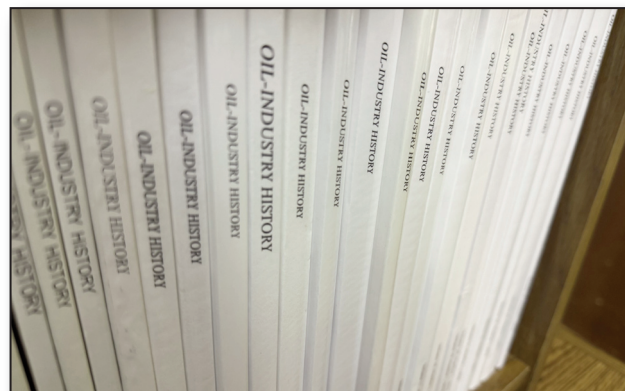
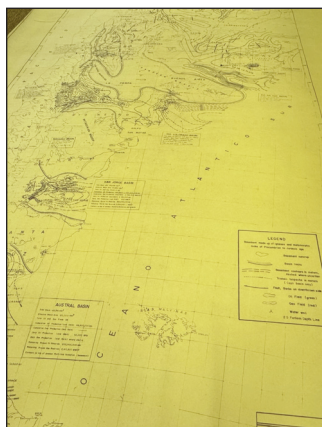
The Petroleum History Institute is dedicated to preserving, researching, and promoting the history of the petroleum industry, particularly the events and advancements rooted in Western Pennsylvania. It publishes scholarly materials, organizes lectures and field trips, and supports a wide network of professionals, historians, and enthusiasts.


Among the Institute's most influential advocates was Sam Pees, a Meadville native and geologist who returned to his roots after a global career in petroleum geology. In the 1980s and 1990s, he led a series of educational lectures and field trips under the theme "Coming Home to the Well," based out of the Drake Well Museum. His passion for the local oil legacy was evident in every talk and tour, which drew students, professionals, and dignitaries alike. Sam played a key role in the creation of the "Friends" of Drake Well Museum and was instrumental in shaping the organization now known as the Petroleum History Institute.

His legendary field trips—with map and bullhorn in hand—made oil history come alive, offering participants an unforgettable connection to the past.

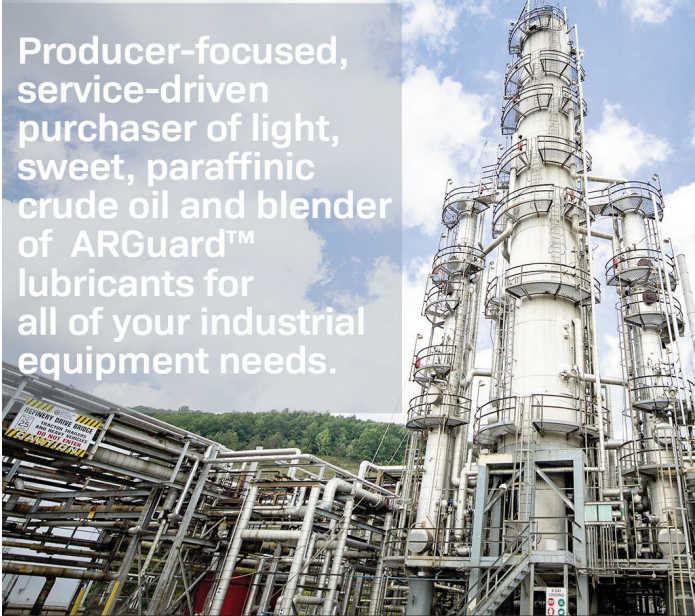
As Meghan's volunteer experience shows, the Institute remains a vital link between past and present, keeping the stories, sites, and spirit of early oil history alive for new generations.

For those interested in supporting or learning more about the Petroleum History Institute, visit [www.petroleumhistory.org](http://www.petroleumhistory.org) or contact Marilyn Black at [marilynblack@windstream.net](mailto:marilynblack@windstream.net)



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## PIOGATech: PFAS/Water & Waste Management Training

### PIOGATech - PFAS/Water & Waste Management Training on July 30 in Washington, Pa.

PIOGA, through its Environmental Committee, will host a vital PFAS / Water & Waste Management Training on Wednesday, July 30, 2025, at the Countryside Banquet & Event Center in Washington, Pa. This full-day event is designed to equip energy and environmental professionals with the latest insights and compliance strategies related to per- and polyfluoroalkyl substances (PFAS), water management, and evolving waste disposal regulations.

**Why Attend?** As regulatory scrutiny increases and PFAS-related issues gain national attention, staying ahead of environmental compliance standards is essential for operators and stakeholders in the oil and gas sector. This training brings together legal, regulatory, and operational experts to provide up-to-date guidance and foster critical industry dialogue.

#### Event Details:

Date: Wednesday, July 30, 2025

Time: 9:00 AM – 3:00 PM (Registration from 8:30 – 9:00 AM)

Location: Countryside Banquet & Event Center, 935 Henderson Ave, Washington, PA 15301

#### Fees:

PIOGA Members: \$175

Non-Members: \$225

*(Includes breakfast, lunch, full-day training, and certificates for Continuing Education Units and Professional Development Hours)*

#### Educational Credits:

Participants will earn .4 CEUs and 4 PDHs, ideal for professionals maintaining licensure or certification in engineering, environmental sciences, or related disciplines.

#### Topics to be Covered:

PFAS: Understanding the impact of PFAS in oil and gas operations and emerging best practices in mitigation and reporting

DEP Updates: Current priorities and future initiatives from the Pennsylvania Department of Environmental Protection

Legal & Regulatory Updates: Presented by experts from firms including Babst Calland and Morgan, Lewis & Bockius LLP

Operator Roundtable: Real-world insights from leading operators like CNX, sharing experiences on waste and water management in the field

#### Registration Information:

**Registration will open soon and must be completed with payment by July 23, 2025.** Cancellations will be accepted without penalty until this date. No refunds will be issued after July 23 due to financial commitments associated with the event.

#### Partners:

PIOGA is hosting this training in collaboration with **Babst Calland, CNX, Morgan, Lewis & Bockius LLP**, and **TD Connections**—all key contributors to the oil and gas regulatory and compliance landscape.

#### Contact:

For additional details or questions regarding CEUs, PDHs, or registration, please contact *Deana McMahan* at [deana@pioga.org](mailto:deana@pioga.org) or (724) 933-7306 ext. 23

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## Historical Figure in Oil & Gas

### Amelia Behrens-Furniss: A Trailblazer in Diving and the Early Oil and Gas Industry

Amelia Behrens-Furniss (1895–1970) was a pioneering figure in an era when both the deep sea and heavy industry were domains overwhelmingly dominated by men. Known primarily as one of the first female deep-sea divers in the United States, her legacy is intertwined with the nascent stages of the offshore oil and gas industry, where her courage and innovation helped pave the way for underwater engineering and repair work that would later become essential in oilfield operations. She was one of the first women to work on offshore oil rigs.

Born in 1895, Amelia came from a family that valued exploration and resilience. Her father, Captain Henry Behrens, was a seasoned diver himself. Under his tutelage, Amelia developed a strong aptitude for diving from an early age—training in heavy gear and working under dangerous conditions that would challenge even experienced men. By the 1920s, Amelia Behrens-Furniss was making headlines as a deep-sea diver who specialized in underwater repair, salvage operations, and pipeline inspection. Her work was highly relevant to the infrastructure that supported oil and gas—especially as the industry began exploring

offshore drilling and underwater pipeline installations. In the early 20th century, the U.S. oil industry was rapidly expanding. As offshore operations increased, so too did the need for skilled divers capable of inspecting and maintaining underwater components such as flow lines, wellheads, and support structures. Amelia's ability to work in such extreme environments made her a valuable asset in these early engineering efforts.

At a time when technical diving was in its infancy, she helped demonstrate the human capability to work at depth under high pressure, contributing to early understandings of decompression, suit integrity, and underwater mechanics. Her techniques and endurance helped influence future protocols for commercial diving—a key component of offshore oilfield development today.

Amelia's story is not only one of gender-breaking boundaries but also of technical excellence in a field critical to one of the world's largest industries. Her role in supporting the infrastructure needed for early oil and gas operations—particularly in underwater environments—was decades ahead of its time. ■



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## PA Supreme Court Hears Oral Arguments on RGGI's Constitutionality

*PIOGA's General Counsel, Todd Pappasergi, attended the arguments and provides this report.*

For over two hours on May 13, 2025, the constitutionality of Pennsylvania's participation in the Regional Greenhouse Gas Initiative (RGGI) was front and center before the seven justices of the Pennsylvania Supreme Court. At the heart of the lawsuit is whether revenue delivered to Pennsylvania and other states through RGGI's carbon dioxide allowance auctions actually constitute taxes being unconstitutionally levied on the oil and gas industry by the Department of Environmental Protection. Further, through arguments made by environmental justice groups, the Court also heard argument on what role, if any, Article I, Section 27 of the Pennsylvania Constitution (the so-called "Environmental Rights Amendment") plays in Pennsylvania's participation in RGGI.

In late 2019, then-Governor Tom Wolf issued an executive order directing DEP to hand down new regulations that would guarantee Pennsylvania's participation in RGGI. First established in 2005 by a group of states on the East Coast, RGGI operates through participating states agreeing to reduce carbon emissions by requiring power plants producing at least 25 MW/year to purchase allowances at auctions to emit carbon dioxide and then, over time, reducing the number of allowances available. Through these auctions, Pennsylvania stands to gain upwards of \$200 million annually.

Following Governor Wolf's 2019 executive order, DEP promulgated a final regulation in 2022, making Pennsylvania the only state to enter the RGGI compact without any input or vote from elected legislators. Lawsuits were immediately filed by impacted electricity generators, and Pennsylvania's participation in RGGI has been paused since then. Last year, the Commonwealth Court found in favor of the electricity generators, holding that RGGI was unconstitutional. The Commonwealth Court held that the RGGI allowance auctions amounted to a tax on the energy industry; and, taxes can only be implemented by the General Assembly. The court continued that, because RGGI was mandated by the Governor and DEP without any General Assembly vote, Pennsylvania's participation was unconstitutional.

DEP appealed, and environmental justice groups were given permission to intervene and participate. Several

amicus curiae briefs were also filed in support of both sides, including one by PIOGA in support of the industry challengers. During last month's oral arguments, the justices concentrated on the clear policy implications that Pennsylvania's involvement in RGGI brings, while simultaneously noting that policy decisions are left solely to the General Assembly by the Constitution. The justices peppered both sides with a basic concept: can a governor and state agency decide that Pennsylvania should join a multi-state compact leading to tens or even hundreds of millions of dollars of policy-based revenue impact without the legislature's consideration or vote?

DEP and environmental groups answered this question with a resounding "yes." They responded that the federal Clean Air Act and Pennsylvania Air Pollution Control Act explicitly authorized DEP to impose and collect fees for the imposition of air pollution programs. They continued that because the auction proceeds can only go to the Pennsylvania's Clean Air Fund, the proceeds are not taxes paid by the energy industry but rather fees paid by electricity generators to the Commonwealth, through RGGI, to operate within Pennsylvania's borders. The environmental group challengers then added on, stating that keeping Pennsylvania's air free of carbon dioxide emissions is mandated by Article I, Section 27 of the Constitution, which enhances RGGI's constitutionality.

When their turn at the dais came, the industry challengers doubled down on the questions posed by many of the justices to DEP: the amount of revenue involved with RGGI, coupled with the massive policy implications of forcing an industry to be carbon free in the future, must be imposed by the General Assembly and not the non-elected employees of a state agency. David Fine of K&L Gates, arguing for the industry challengers, continued that the revenue itself is uncontrollable, and having uncontrollable revenue entering the state coffers is a policy choice in and of itself that is unconstitutional unless mandated by the legislature. Mr. Fine continued that executive agencies have the power to impose fees related to the administration of a program; but, because the RGGI fees received far surpass the entire DEP budget for any given year, there is no connection with the fees to an administrative program and therefore go well beyond the purview of DEP.

The Senate GOP concluded the argument by countering

*Continued on page 9*



## **RGGI** *Continued from page 8*

the contentions of the environmental groups that Article I, Section 27 saves the RGGI regulations. The caucus pointed out that Article I, Section 27 exists to limit impermissible state action in regard to the Commonwealth's natural resources, and further to protect the public resources common to all citizens. The RGGI regulations may actually violate Article I, Section 27, because it explicitly mandates a state action on private property – the limiting of carbon emissions on private property – while then also essentially placing the Commonwealth's air up for sale. Article I, Section 27, in the eyes of the GOP caucus, authorizes neither of these actions.

Despite the 5-2 Democratic majority on the Court, this oral argument was a fascinating example of how the justices, both individually and as a collective, truly consider the impact their decisions may have on not just the case before them, but the whole of Pennsylvania law. The vast majority of the argument was focused on executive power generally, with the RGGI regulations simply as the vehicle in which the justices prodded that issue.

All that's left now is for the Court to issue its decision. There are no strict timeframes by which the Court must issue its opinion; and, given the weighty issues at hand coupled with the extensive briefing in the case, a wait of a few months would not be unexpected. While anticipating what the outcome will be is a fool's errand, the questions posed by the justices certainly reveal that serious questions exist regarding the constitutionality of Pennsylvania's participation in RGGI and DEP's RGGI regulations. ■

## **PIOGA's 2025 Golf Outing**

### **Get Ready for PIOGA's Upcoming Golf Outing at Lake Arthur Golf Club!**

September 11th at Lake Arthur Country Club – Butler, Pa.

Mark your calendars, PIOGA members – an exciting day of golf, networking, and camaraderie is on the horizon! We are thrilled to announce our annual golf outing, set for **September 11th** at the beautiful Lake Arthur Golf Club at **Lake Arthur Country Club** in Butler, Pa.

Whether you're a seasoned pro or a casual golfer, this event promises something for everyone. Expect a fun-filled day, complete with plenty of opportunities to connect with fellow PIOGA members, share industry insights, and enjoy some friendly competition.

#### **Here's what you can look forward to:**

**Tee Time:** A beautiful course, perfect for both the seasoned golfers and those just looking to enjoy the game.

**Networking Opportunities:** Meet fellow professionals, make new connections, and catch up with old friends in a relaxed and enjoyable environment.

**Prizes and Giveaways:** Don't miss out on the chance to win fantastic prizes throughout the day – there's something for everyone!

**Delicious Food:** After a round of golf, indulge in a great selection of food and refreshments to keep the energy going.

**Connection and Fun:** Beyond the game, this is an excellent chance to build stronger relationships with others in the industry in a fun and casual setting.

Details about registration, tee times, and sponsorship opportunities are coming soon, so keep an eye on your inbox for more information.

This is one event you don't want to miss! Stay tuned for all the updates, and be ready to join us for a day of sun, fun, and golf at one of Butler's premier golf courses.

**Save the Date:** September 11th

**Location:** Lake Arthur Country Club, Butler, Pa.

**More Information Coming Soon!**

We can't wait to see you there!

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# Pipeline Safety Regulatory Initiatives Under the Trump Administration

Lee Banse, Esq. Babst Calland.

**Introduction** - Since entering office, President Trump has issued multiple executive orders seeking to promote the deregulation of American business, improve government efficiency, and unleash American energy.<sup>1</sup> In response, the U.S. Department of Transportation (DOT) and its agency responsible for pipeline safety, the Pipeline and Hazardous Materials Safety Administration (PHMSA), have initiated multiple rulemakings to achieve these objectives. This article will provide a brief overview of the initiatives that will impact operators subject to PHMSA's pipeline safety regulations. Operators can engage with DOT and PHMSA by providing comments to assist in the deregulatory efforts.

## ***DOT Initiatives - Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs Request for Information***

- On April 3, 2025, citing President Trump's executive orders related to deregulation and government efficiency,<sup>2</sup> DOT published a request for information (RFI) seeking the public's input to identify which DOT regulations, guidance, paperwork requirements, or other regulatory obligations can be modified or repealed<sup>3</sup>. The RFI is broad in scope and applies to all DOT programs, including the pipeline safety regulations, and seeks information to help drive future deregulatory rulemakings and initiatives. DOT requested comments on the RFI to be submitted by May 5, 2025, but has also established an email inbox,

[Transportation.RegulatoryInfo@dot.gov](mailto:Transportation.RegulatoryInfo@dot.gov), which remains open on a continuous basis for the public to submit additional ideas on programs suitable for modification or repeal.

## ***Administrative Rulemaking, Guidance, and Enforcement Procedures Notice of Proposed Rulemaking***

- On May 16, 2025, DOT published a notice of proposed rulemaking (NPRM) to recodify certain DOT administrative procedures and practices in the Code of Federal Regulations (CFR)<sup>4</sup>. Known informally as the "Rule on Rules," the NPRM primarily addresses the process and procedures that control how the DOT performs its core regulatory functions of rulemaking, guidance development, and enforcement. The first Trump administration promulgated a Rule on Rules in 2019<sup>5</sup>, but the Biden administration rescinded nearly all its provisions in 2021<sup>6</sup>. The NPRM would reinstate, update, and expand on

the requirements in the first Rule on Rules.

The NPRM includes rulemaking procedures that would apply to all DOT modes for each phase of a rulemaking and would recodify in the CFR provisions related to the DOT Regulatory Reform Task Force (RRTF). The RRTF is responsible for evaluating existing and proposed DOT regulations and providing recommendations to the Secretary of Transportation on whether regulations should be repealed or modified to reduce unnecessary regulatory burdens. Another key proposal in the NPRM includes heightened procedural requirements for rulemakings determined to be economically significant and high-impact (established through an estimation of the costs and job losses attributed to the proposed rule).<sup>7</sup>

For enforcement requirements, the NPRM includes provisions that stress that DOT must use its investigatory powers in a manner consistent with due process, basic fairness, as well as avoiding the use of enforcement as a "fishing expedition" to search for potential non-compliance<sup>8</sup>. The NPRM also proposes to disqualify DOT personnel with personal animus against specific regulated parties from participating in enforcement against those parties, and allows operators to petition the DOT's Office of General Counsel (OGC) to determine if DOT personnel violated an enforcement rule<sup>9</sup>. If a violation occurred, DOT OGC may, among other relief, remove the responsible DOT enforcement team from the case.<sup>10</sup>

For the first Rule on Rules, the Trump administration directly issued a final rule without providing an opportunity for public comment, because the rule only incorporated internal DOT administrative procedures into the CFR. For this rulemaking, since certain proposals in the NPRM would confer express rights to regulated parties, such as the ability to petition the OGC about DOT violations of enforcement procedures, DOT is seeking public comment. The public comment period for the NPRM closes June 16, 2025. Following the comment period, DOT will begin to evaluate the public comments and work to finalize the rule.

## ***PHMSA Initiatives - Mandatory Regulatory Reviews to Unleash American Energy and Improve Government***

***Efficiency Advance Notice of Proposed Rulemaking*** - On June 4, 2025, PHMSA published an advance notice of proposed rulemaking (ANPRM) seeking public comment to identify requirements in the pipeline safety regulations suitable for repeal or modification<sup>11</sup>. The ANPRM is broad in scope and

1.Exec. Order No. 14,192, "Unleashing Prosperity through Deregulation," 90 Fed. Reg. 9,065 (Feb. 6, 2025); Exec. Order No. 14,219, "Ensuring Lawful Governance and Implementing the President's 'Department of Government Efficiency' Deregulatory Initiative," 90 Fed. Reg. 10,583(Feb. 25, 2025); Exec. Order No. 14,154, "Unleashing American Energy," 90 Fed. Reg. 9,065 (Feb. 6, 2025); Exec. Order No. 14,156 "Declaring a National Energy Emergency," 90 Fed. Reg. 8,433 (Jan. 29, 2025).

2 .Department of Transportation, "Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs," 90 Fed. Reg. 14,593 (Apr. 3, 2025).

3. Id.

4. Department of Transportation, "Administrative Rulemaking, Guidance, and Enforcement Procedures," 90 Fed. Reg. 20,956 (May 16, 2025).

5. Department of Transportation, "Administrative Rulemaking, Guidance, and Enforcement Procedures," 84 Fed. Reg. 71,714 (Dec. 27, 2019).

6. Department of Transportation, "Administrative Rulemaking, Guidance, and Enforcement

Procedures," 86 Fed. Reg. 17,292 (Apr. 2, 2021).

7. 90 Fed. Reg. 20,956, 20,968 (May 16, 2025).

8. Id. 20,972-20,973.

9. d. 20,976.

10. Id.

11.Pipeline and Hazardous Materials Safety Administration, "Pipeline Safety: Mandatory Regulatory Reviews to Unleash American Energy and Improve Government Efficiency," 90 Fed. Reg. 23,660 (Jun.

*Continued on page 12*

## PHMSA *Continued from page 11*

requests comments on any PHMSA interpretation, guidance document, or any other material implementing the pipeline safety regulations which are suitable for modification or repeal. Additionally, the ANPRM seeks comment on whether PHMSA should codify in the pipeline safety regulations a requirement to conduct periodic regulatory reviews so that the agency is continuously reviewing and identifying regulations that require modification. Public comment on the ANPRM is due by **August 4, 2025**.

**Liquefied Natural Gas Facilities Advance Notice of Proposed Rulemaking-** On May 5, 2025, PHMSA published in the Federal Register an ANPRM seeking public comments to help guide amendments to 49 C.F.R. Part 193, the safety standards applicable to liquefied natural gas (LNG) facilities.<sup>12</sup>

Citing the growing importance of LNG to the economy and that the current Part 193 requirements incorporate out-of-date industry standards that no longer align with modern LNG operations or facilities, PHMSA requested public comment to understand how best to revise Part 193. Specific topics discussed in the ANPRM include (1) the appropriate means to clarify the scope of PHMSA's jurisdiction over LNG facilities; (2) whether different types of LNG facilities, e.g., peak shavers and export terminals, should be regulated differently; (3) possible amendments to LNG facility reporting requirements; and (4) how best to update the current industry standards incorporated in Part 193. The public comment period for the ANPRM closes on **July 7, 2025**.

### **Repair Criteria Advance Notice of Proposed Rulemaking**

On May 21, 2025, PHMSA published an ANPRM requesting public comment on how best to update the agency's repair criteria in 49 C.F.R. Part 192 for gas pipelines, and in 49 C.F.R. Part 195 for hazardous liquids and carbon dioxide pipelines, as well as updating inspection requirements for in-service breakout tanks.<sup>13</sup> Parts 192 and 195 include repair criteria and remediation timelines for certain pipeline anomalies, such as dents and corrosion. These requirements differ depending on whether the pipeline is subject to Part 192 or 195 integrity management (IM) requirements.

Noting that certain Part 192 or Part 195 repair criteria and timelines had not been updated for an extended period and do not accommodate advances in modern technologies and methods to manage pipeline integrity, PHMSA requested public comment on an extensive list of topics to help guide a future rulemaking to modernize the repair criteria and reduce their current regulatory burden. Certain specific topics in the ANPRM include (1) whether the current repair criteria and

remediation timelines provided commensurate safety benefits when measured against compliance costs; (2) whether the current regulations can appropriately accommodate the use of innovative technologies or methods; (3) identification of potential amendments to annual, incident, and safety-related condition reporting; and (4) identification of potential changes to the IM repair criteria for longitudinal seam weld corrosion on hazardous liquid pipelines.<sup>14</sup> The comment period for the ANPRM closes on **July 21, 2025**.

**Public Comments on Interpretation Requests** - Apart from new rulemakings, PHMSA has also adopted a new process which allows the public to provide comments on interpretation requests under review by the agency. Under PHMSA's regulations, any person may file an interpretation request seeking PHMSA's guidance on the meaning of its regulations or how the regulations would apply in specific circumstances.<sup>15</sup> Previously, PHMSA did not make an interpretation request publicly available until it also published its response. Under the Trump administration, PHMSA now publishes the interpretation requests it receives on its website<sup>16</sup>, and provides a 30-day comment window, so that the public may provide input on how PHMSA should respond. The new process provides operators with notice of pending interpretation requests that may have industry-wide implications and allow operators to participate in the interpretation process.

**Conclusion** - For pipeline operators, the current focus of DOT and PHMSA to improve efficiency, modernize, and deregulate its programs provides an opportunity to inform DOT and PHMSA's efforts by providing comments in the rulemaking proceedings. Additionally, operators should be aware that the situation remains dynamic, and it is likely that DOT and PHMSA will continue to add new deregulatory initiatives alongside those already announced. Operators should continue to track DOT and PHMSA activity to determine if there are any new initiatives that they may want to participate in. ■

*Lee Banse is an attorney in Babst Calland's Washington, D.C. office and a member of the Energy and Natural Resources and Pipeline and HazMat Safety groups. Mr. Banse represents clients in pipeline safety matters before the Pipeline and Hazardous Materials Safety Administration (PHMSA), state agencies, and federal courts.*

*Contact him at [lbanse@babstcalland.com](mailto:lbanse@babstcalland.com) or 202-853-3463.*



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4, 2025).

<sup>12</sup>Pipeline and Hazardous Materials Safety Administration, "Pipeline Safety: Amendments to Liquefied Natural Gas Facilities," 90 Fed. Reg. 18,949 (May 5, 2025).

<sup>13</sup>Pipeline and Hazardous Materials Safety Administration, "Pipeline Safety: Repair Criteria for Hazardous Liquid and Gas Transmission Pipelines," 90 Fed. Reg. 21,715 (May 21, 2025).

<sup>14</sup> Id. 21,717-27,719.

<sup>15</sup> 49 C.F.R. § 190.11(b).

<sup>16</sup> <https://www.phmsa.dot.gov/standards-rulemaking/pipeline/interpretations/pending-pipeline-interpretations>



## New PA Corporate Reporting Requirement Deadline

### ***New PA Corporate Reporting Requirement Deadline - Fast Approaching***

A new Pennsylvania law requires practically every registered business entity in the state to file an Annual Report with the Pennsylvania Department of State's Bureau of Corporations and Charitable Organizations. Previously, businesses were required to file this report every ten years; the new law changes that to an annual reporting requirement. Your reporting deadline is based on the type of business organization you are, as follows:

#### **BUSINESS ORGANIZATION TYPE/ ANNUAL FILING DEADLINE/ FEE**

**For-Profit Corporation/** June 30/ \$7 — **Non-Profit Corporation/** June 30/ no fee — **Limited Liability Company/** Sept. 30/\$7

**All Other Business Organizations/** December 31/\$7 (unless the purpose is not-for-profit, then no fee)

The failure to file the Annual Report by the appropriate deadline may subject your business to various penalties, including the dissolution or termination of your business registration and the loss of the exclusive use of your business's name. Importantly, the Annual Report must be filed by every entity registered to do business in Pennsylvania, whether you are incorporated in Pennsylvania or somewhere else.

The Annual Report may be filed online [HERE](https://www.pa.gov/agencies/dos/programs/business/types-of-filings-and-registrations/annual-reports.html) (<https://www.pa.gov/agencies/dos/programs/business/types-of-filings-and-registrations/annual-reports.html>), and only collects data such as your business name, registered and principal place of business addresses, state of incorporation, and the names and titles of your business governors and principal officers. ■

## PIOGA Derrick Docket - Unanimous U.S. Supreme Court Narrows NEPA

*Todd Pappasergi, PIOGA General Counsel & VP of Governmental Affairs*

*"Simply stated, NEPA is a procedural cross-check, not a substantive roadblock. The goal of the law is to inform agency decision-making, not to paralyze it." ~ Justice Brett Kavanaugh*

On May 29, 2025, the U.S. Supreme Court issued a landmark decision in *Seven County Infrastructure Coalition v. Eagle County*, unanimously ruling 8-0 to limit the scope of environmental reviews under the National Environmental Policy Act (NEPA). The case concerned the Uinta Basin Railway, an 88-mile proposed rail project in Utah intended to transport crude oil to refineries and other strategic locations.

Writing for the Court, Justice Brett Kavanaugh stated that NEPA imposes only procedural requirements on federal agencies and does not compel them to assess indirect or speculative environmental consequences, especially ones that arise outside their regulatory authority. He stated, "NEPA is a procedural cross-check, not a substantive roadblock." The ruling reverses a lower court decision that had blocked the project on the basis that the Surface Transportation Board (STB) failed to fully assess downstream environmental impacts, such as increased oil extraction and refining, which would result from the railway's completion, despite them not being part of the actual railway construction itself.

Kavanaugh emphasized that agencies are only required to consider environmental effects that are "reasonably foreseeable" from the project before the STB and within their jurisdiction to regulate. In this case, the STB had analyzed the direct impacts of the railway—such as construction disturbance, habitat disruption, and localized pollution—but did not delve into speculative consequences stemming from market responses or unrelated third-party activities. The lower courts found this failure to be fatal to the STB's NEPA review; the High Court unanimously disagreed. This decision reinforces prior precedent that NEPA does not expand an agency's statutory authority or force it to reject projects based on broader environmental policy goals.

This outcome has the potential to significantly reduce the legal risks for major infrastructure projects by curbing challenges based on secondary or indirect environmental effects. Going forward, federal agencies may feel empowered to approve energy and transportation projects more quickly, knowing that NEPA obligations are procedural rather than predictive. The decision marks a turning point in the balance between environmental review and development facilitation, and how it is applied by federal agencies during the Trump Administration will bear watching. ■

## PIOGA Member Company Profile: The SRS Group



Every company has a story. The SRS Group began modestly in 1988 in the spare room of Founder, President, and CEO Greg Johnson. Originally named Susquehanna Rehabilitation Services, it reflected the company's Pennsylvania roots near the Susquehanna River.

The founder began his career at a workers' comp case management company that was later acquired by a corporate giant. As a case manager, he was drawn to the unique challenges injured workers faced and saw the difference proper support could make in helping them recover and return to work safely. This passion led to the creation of The SRS Group. It wasn't always easy, but through consistent effort and unwavering determination, the company has endured—and this July, it proudly celebrates 37 years in business.

The company initially specialized in field-based workers' compensation case management. While effective, this approach relied heavily on referrals from insurance companies—typically when additional medical support was needed or when returning an injured worker to the job became difficult. Over time, it became clear that this reactive model limited the ability to provide timely and meaningful support. Delays within the insurance process—caused by a lack of urgency, postponed medical care, attorney involvement, high adjuster turnover, or overwhelmed caseloads—often left injured employees lost in the system. The company recognized that earlier involvement in the Workers' Compensation process could lead to better outcomes for both employers and employees.

A major shift for The SRS Group came nearly 20 years ago. After reviewing years of research showing that early medical intervention led to faster recoveries, better outcomes, and lower costs, we asked: Why wait? Why delay care until after an insurance claim is filed? Most workplace injuries don't require an ER or urgent care visit, and many, if treated promptly and conservatively, never become workers' comp claims. The old mindset of "we've always done it this way" wasn't good enough. An injury is an injury—whether it becomes a claim or not—and the most effective approach is early intervention. That's why we developed Acute Injury Management (AIM).

Traditionally work-related injuries have had a three-tiered approach: 1) Medical Provider Visit (Panels in some states); 2) Insurance Claims Process (File a claim and begin the process); 3) Workers' Comp Case Management (when nothing seems to be progressing).

Typically, the process follows this order as well. Send the employee to a medical professional who only assesses and

addresses the injury. Then file a claim with the insurance company who primarily addresses the claims process. If the injured worker doesn't return to work or has a medical delay, then send them to workers' comp nurse case management who understands both the medical needs and the workers' comp process.

The SRS Group's solution came from the recommendation of one of its Nurse Supervisors and very experienced Worker's Comp Registered Nurse Case Managers. The solution was to act similar to what occurs in the Emergency Room, provide Acute Injury Medical Triage to assess an injury and prioritize the medical care based on the level of care needed. The SRS Group's Medical Triage process started years ago telephonically and today employ both telephonic and video triage. The SRS Group's Triage Registered Nurse is the first point of contact while the employee is still in the field or plant, local or working remote. Immediate assessment, fully documented and proactive. This has benefited both the employer and the employee.

Study after study and SRS's real-world experience demonstrated that the early intervention and medical triage demonstrated:

- Employees felt more valued and connected to their care
- Employee attitudes were more positive
- The faster employees return to work
- Less attorney involvement & legal costs
- Lower indemnity costs
- Quicker recovery time and less expensive medical claims
- Lower OSHA Recordable WC Claims

This approach has made a meaningful difference—improving injured workers' care and outlook while reducing overall costs for employers. As our Founder, President & CEO put it: "As a business owner, I understand the challenges companies face to stay competitive and support their employees. An injury can be a serious setback. But our Injured Worker Triage has proven to be a true win-win."

Although a lot has changed since 1988, a few things have remained the same. The foundation of the company at its core has been a commitment to its employees, and preferred providers all with one objective: to serve its customers. The SRS Group understands what it takes to be successful and that is why next month it is entering the 37th year as a Pennsylvania based family-owned business. ■



## PROMOTE and BOOST YOUR BUSINESS with PIOGA!

Advertising Now Open for the 2025–2026 PIOGA Membership Directories

Don't miss your chance to elevate your brand and connect with Pennsylvania's oil and gas industry leaders—advertising opportunities are now available in our 2025–2026 PIOGA Membership Directories!

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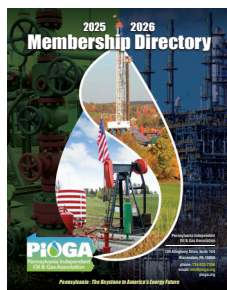
Let your fellow members know who you are, what you do, and that you're proud to be part of PIOGA! This is a perfect opportunity to make your presence known, grow your network, and show your support for the industry.

#### ✓ Key Details:

- All premium ad positions are sold out – but don't worry! *There is unlimited high-visibility space available in our Preferred Suppliers Section.*

- Deadline for artwork and payment: June 30, 2025

**For more information contact Debbie Oyler at  
debbie@pioga.org or 724.933.7306 ext. 22.**



## THANK YOU TO OUR 2025 PIOGA PARTNERS



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TrenchTech Inc - PA | 800 Ayers Ave | Lemoyne, PA 17043

## Oil & Gas Dashboard

### Sources

American Refining Group:

[www.amref.com/Crude-Prices-New.aspx](http://www.amref.com/Crude-Prices-New.aspx)

Ergon Oil Purchasing: [www.ergon.com/crudeoil](http://www.ergon.com/crudeoil)

Gas futures: [quotes.ino.com/exchanges/?r=NYMEX\\_NG](http://quotes.ino.com/exchanges/?r=NYMEX_NG)

Baker Hughes rig count: [bakerhughesrigcount.gcs-web.com/na-rig-count](http://bakerhughesrigcount.gcs-web.com/na-rig-count)

NYMEX strip chart: Mid American Natural Resources

Basis futures values: IGS Energy, Inc.

### Penn Grade Crude Oil Prices

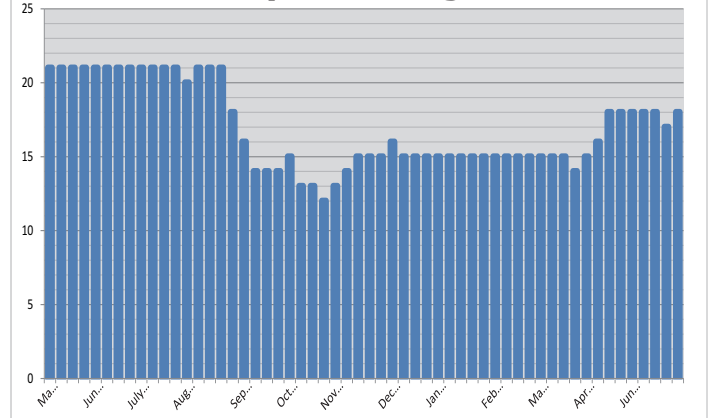


### Natural Gas Futures Closing Prices

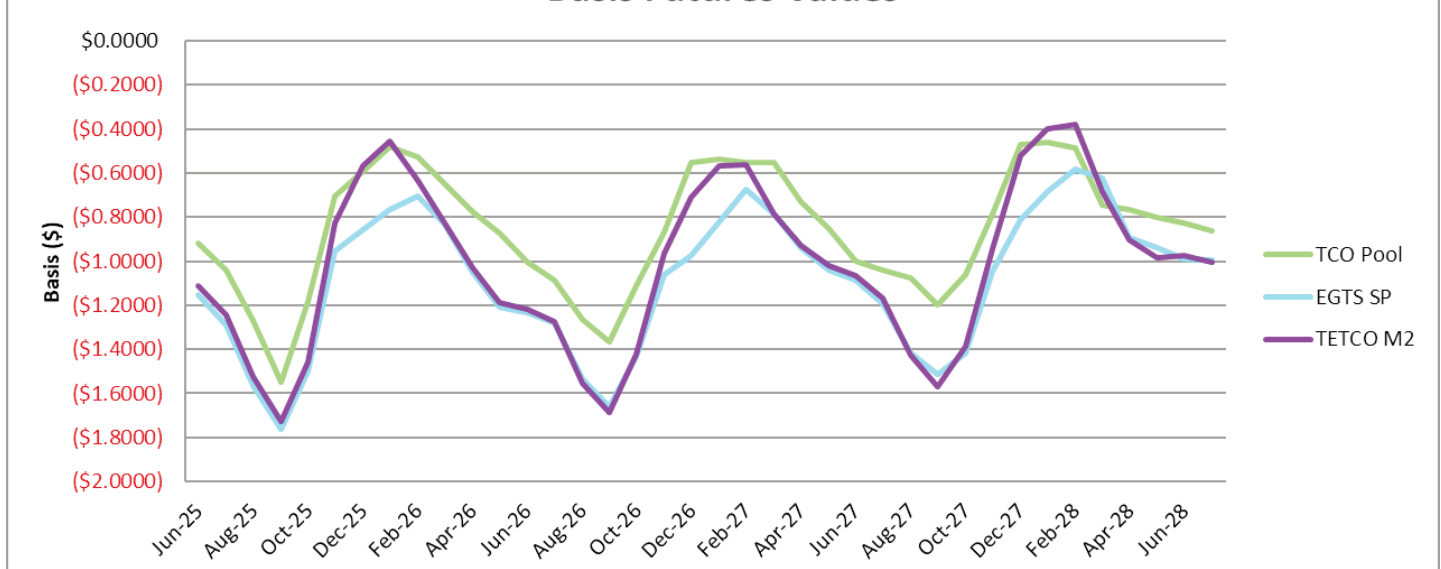
|              |       |
|--------------|-------|
| July 2025    | 3.533 |
| August       | 3.631 |
| September    | 3.620 |
| October      | 3.720 |
| November     | 4.111 |
| December     | 4.654 |
| January 2026 | 4.937 |
| February     | 4.669 |
| March        | 4.235 |
| April        | 3.939 |

Prices as of June 11, 2025

### Pennsylvania Rig Count



### Basis Futures Values





# Northeast Pricing Report — June 2025

The breakout above the 200-day moving average is drawing attention as a possible inflection point for bullish momentum. This level, now acting as a key support, may control short-term direction. Should the rally gather steam, bulls may target \$4.186 per MMBtu in the coming sessions, contingent on sustained buying and weather-driven demand. Last week's EIA storage report confirmed a 101 Bcf injection, exceeding both the five-year average of 98 Bcf and last year's 84 Bcf increase. Inventories now stand at 2,476 Bcf—93 Bcf above the five-year average, although still 316 Bcf below 2024 levels. Strong storage builds continue to challenge upside potential, even as traders eye seasonal demand strength.

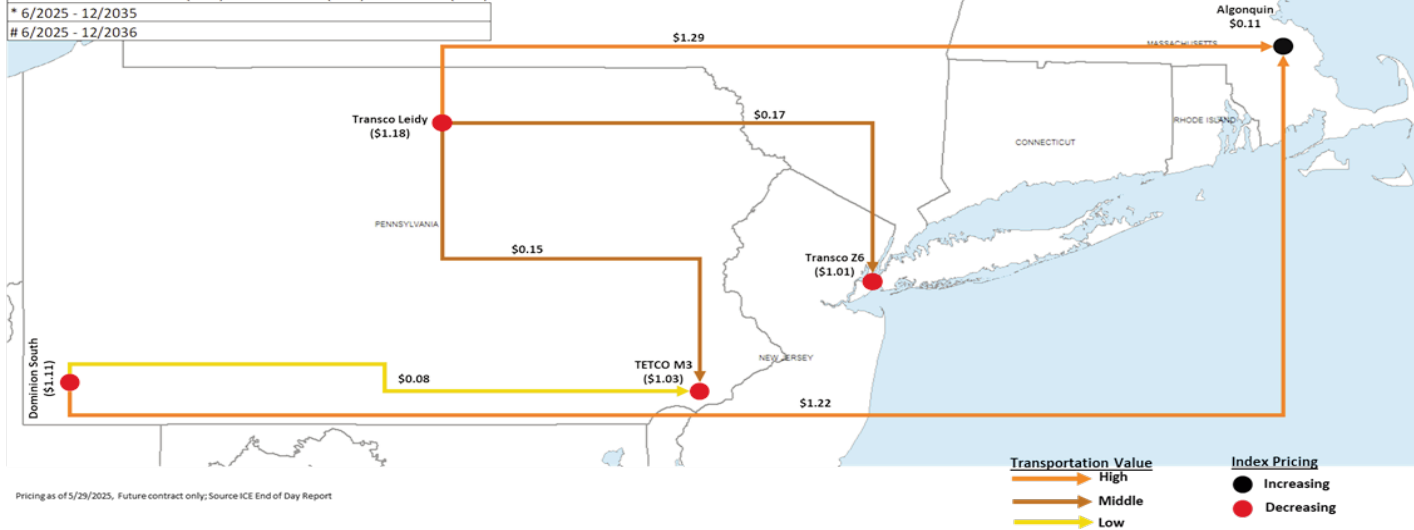
In May 2025, Appalachian natural gas prices averaged \$2.50 per MMBtu, reflecting seasonal trends and moderate demand. By June 2025, prices saw a slight decline, averaging \$2.02 per MMBtu, as regional supply remained strong and demand softened with warmer temperatures. This drop aligns with typical summer trends, where lower heating demand and pipeline maintenance contribute to price fluctuations.

## Transportation Value Market Indicator

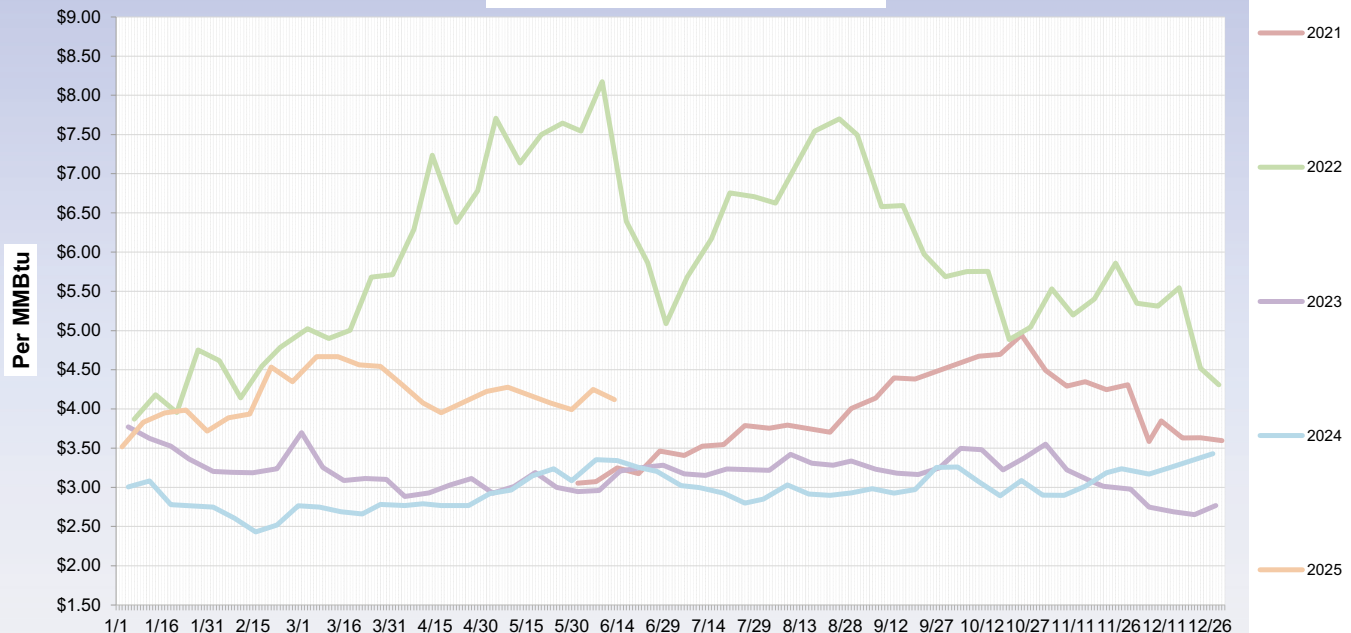


Provided by Bertison-George, LLC  
www.bertison-george.com

| Natural Gas Basis Future Pricing (\$/MMBtu) |              |               |                |
|---|--------------|---------------|----------------|
| Location                                    | Pricing Term |               |                |
|   | 6/2025       | 6/2025-5/2026 | 6/2025-12/2030 |
| Algonquin                                   | 0.11         | 1.93          | 1.59           |
| Dominion South #                            | (1.11)       | (1.11)        | (1.02)         |
| TETCO M3 *                                  | (1.03)       | (0.22)        | (0.06)         |
| Transco Z6 *                                | (1.01)       | 0.24          | 0.10           |
| Transco Leidy *                             | (1.18)       | (1.06)        | (1.00)         |



## NYMEX ANNUAL STRIP PRICE



## Spud Report: May



## PIOGA In The News

The data show below comes from the Department of Environmental Protection. A variety of interactive reports are available by going to the Office of Oil and Gas Management page at [www.dep.pa.gov](http://www.dep.pa.gov) and choosing Report from the menu. The table is sorted by operator and lists the total wells reported as drilled last month. Spud is the date drilling began at a well site. The API number is the drilling permit number issued to the well operator. An asterisk (\*) after Operator indicates a conventional well.

| Operator            | Wells | Date    | API#      | County      | Municipality  |
|---------------------|-------|---------|-----------|-------------|---------------|
| Branch, John D *    |       | 5/14/25 | 123-49128 | Warren      | Warren City   |
| Cameron Energy *    | 2     | 5/6/25  | 123-48932 | Warren      | Sheffield Twp |
|                     |       | 5/15/25 | 123-48934 | Warren      | Sheffield Twp |
| Coterra Energy      | 6     | 5/9/25  | 115-23201 | Susquehanna | Forest Lake   |
|                     |       | 5/9/25  | 115-23202 | Susquehanna | Forest Lake   |
|                     |       | 5/9/25  | 115-23150 | Susquehanna | Forest Lake   |
|                     |       | 5/9/25  | 115-23151 | Susquehanna | Forest Lake   |
|                     |       | 5/9/25  | 115-23152 | Susquehanna | Forest Lake   |
|                     |       | 5/9/25  | 115-23153 | Susquehanna | Forest Lake   |
| Gas & Oil Mgmt *    | 2     | 5/6/25  | 123-48952 | Warren      | Mead Twp      |
|                     |       | 5/15/25 | 123-49025 | Warren      | Mead Twp      |
| Pa Gen Energy       | 2     | 5/13/25 | 081-22037 | Lycoming    | Shrewsbury    |
|                     |       | 5/15/25 | 081-22036 | Lycoming    | Shrewsbury    |
| Pa Well Dev.        |       | 5/9/25  | 065-27128 | Jefferson   | Young Twp     |
| Range Resources     | 5     | 5/2/25  | 003-22684 | Allegheny   | North Fayette |
|                     |       | 5/3/25  | 003-22685 | Allegheny   | North Fayette |
|                     |       | 5/5/25  | 003-22686 | Allegheny   | North Fayette |
|                     |       | 5/6/25  | 003-22687 | Allegheny   | North Fayette |
|                     |       | 5/6/25  | 003-22688 | Allegheny   | North Fayette |
| Wilmoth Interests * | 3     | 5/5/25  | 123-49048 | Warren      | Sheffield Twp |
|                     |       | 5/15/25 | 123-49047 | Warren      | Sheffield Twp |
|                     |       | 5/23/25 | 123-49046 | Warren      | Sheffield Twp |

|                     | May       | April     | March     | Feb       |
|---------------------|-----------|-----------|-----------|-----------|
| <b>Total Wells</b>  | <b>22</b> | <b>67</b> | <b>41</b> | <b>41</b> |
| Unconventional Gas  | 13        | 62        | 32        | 31        |
| Conventional Gas    | 0         | 0         | 0         | 0         |
| Oil                 | 8         | 5         | 8         | 6         |
| Combination Oil/Gas | 0         | 0         | 1         | 1         |
| Waste Disposal      | 1         |           |           |           |

## New PIOGA members Welcome!

### TEAM, Inc.

Andy Shingledecker

4333 W. 21st St. Tulsa, OK 74107

### Allies & Providers

### The SRS Group, LLC

Greg Johnson

PO Box 803 - New Kingstown, Pa 17072

### Allies & Providers

## PIOGA Responds to Misleading Editorial from State Rep. Greg Vitali

PIOGA was recently featured in the Pittsburgh Post-Gazette in response to an op-ed by State Representative Greg Vitali (D–Delaware County), Chairman of the House Environmental Resources and Energy Committee. In his column, Rep. Vitali painted an inaccurate and highly misleading picture of Pennsylvania’s oil and gas industry, calling for increased DEP staffing and expanded regulatory oversight based on broad generalizations and outdated information.

In our published response, PIOGA President & Executive Director Dan Weaver and General Counsel & Vice President of Governmental Affairs Todd Pappasergi set the record straight.

PIOGA highlighted the essential economic role that Pennsylvania’s oil and gas producers play in supporting over 100,000 jobs, powering local communities, and contributing billions to the state’s economy. PIOGA also corrected several of Rep. Vitali’s claims, including the long-debunked notion that today’s operators are responsible for plugging century-old orphaned wells—wells that predate any modern regulation or permitting.

Our response emphasized the need for balanced and informed policy, not rhetoric that undermines Pennsylvania’s competitiveness. As other states like Ohio and West Virginia continue to embrace their energy sectors to attract AI and data center investment, Pennsylvania cannot afford to push away innovation and job growth through politically motivated overregulation.

PIOGA will continue to advocate for policies that promote environmental responsibility and economic vitality. Our members are committed to safe, responsible energy development—and we will not allow the industry to be mischaracterized by those who do not represent the facts.

Let’s work together to power Pennsylvania’s future.

**Links:** *Pittsburgh Post Gazette:* <https://www.post-gazette.com/opinion/letters/2025/06/08/incorrect-vitali/stories/202506080069>

*Marcellus Drilling News:* <https://marcellusdrilling.com/2025/06/pa-rep-greg-vitali-d-attacks-og-pioga-responds/>

*Daily Times:* <https://www.delcotimes.com/2025/06/13/guest-column-pennsylvanias-energy-fuels-our-future-a-response-to-vitali/>



## Calendar

### PIOGA events

Information: [www.pioga.org](http://www.pioga.org) > PIOGA Events

#### PIOGA 2025 Events

**PiogaTech - PFAS/Water & Waste Management Training**  
July 30

**PIOGA's - Producers Golf Outing**  
TBA

**PIOGA - Lake Arthur Golf Club Event**  
September 11

### Other events

**96th Annual IPAA Meeting**  
June 17-19  
(<https://pioga.org/event/96th-annual-ipaa-annual-meeting/>)

**WEN Gala**  
August 15  
(<https://pioga.org/event/wen-gala/>)

**GO WV - Oil & Gas Festival**  
September 11-13  
(<https://pioga.org/event/go-wv-oil-gas-festival/>)

**Appalachian Hydrogen & Carbon Capture Conference**  
October 16  
(<https://pioga.org/event/appalachian-hydrogen-carbon-capture-conference-2/>)

**Full Calendar - PIOGA Event & Meeting Schedule -**  
[https://pioga.org/publication\\_file/2025-PIOGA-Calendar.pdf](https://pioga.org/publication_file/2025-PIOGA-Calendar.pdf)

PIOGA Members and Industry Partners - Please email [meghan@pioga.org](mailto:meghan@pioga.org) to advertise upcoming events.



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### **Pennsylvania Independent Oil & Gas Association**

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