September 9, 2021

Administrator Michael Regan
Environmental Protection Agency
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Ave. NW
Washington DC 20460

Dear Administrator Regan:

We greatly appreciate the Environmental Protection Agency's commitment to address methane emissions from the oil and gas sector, and we respectfully urge you to adopt protective methane standards for these sources that include comprehensive coverage for both new and existing sources and address all significant sources of emissions. Protective standards must include no carveouts, and must secure the substantial, science-based pollution reductions needed to help address the climate crisis and to ensure healthy communities.

We are in the midst of another summer during which families and communities throughout the country are experiencing the deeply harmful impacts of climate change—from the devastation that Hurricane Ida wrought for families and communities across the Gulf Coast, New York and New Jersey to the tragic fires across the western United States and extreme heat that has impacted communities across the country. The recently released Intergovernmental Panel on Climate Change (IPCC) Report underscores the urgent need for swift, protective action to reduce methane emissions, a necessary step toward mitigating these harmful impacts and limiting warming to 1.5 degrees Celsius above pre-industrial temperatures.[1] Methane, the main component of natural gas, is a potent climate pollutant and human-caused methane emissions are responsible for at least 25% of the warming we are experiencing today.[2] There is now more methane in the atmosphere than any time in the last 800,000 years, with concentrations increasing at an alarming rate since 2007, in significant part because of fossil fuel production.[3]

Immediately deploying all feasible mitigation measures across sectors could cut methane pollution in half by 2030, slowing climate change and avoiding up to a quarter degree of warming by

[1] Intergovernmental Panel on Climate Change, *Sixth Assessment Report, Climate Change 2021: The Physical Science Basis, Summary for Policymakers*, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf
[2] Intergovernmental Panel on Climate Change, *Fifth Assessment Report, Climate Change 2013: The Physical Science Basis, Chapter 8SM – Anthropogenic and Natural Radiative Forcing – Supplementary Material*, https://www.ipcc.ch/report/ar5/wg1/chapter-8sm-anthropogenic-and-natural-radiative-forcing-supplementary-material/
[3] Intergovernmental Panel on Climate Change, *Sixth Assessment Report, Climate Change 2021: The Physical Science Basis, Technical Summary*, TS-35, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_TS.pdf

midcentury.[4] And studies have shown that innovative standards can support good-paying jobs in the growing methane mitigation industry while delivering deep emission reductions.[5]

As we transition from the unabated use of fossil fuels to cleaner forms of energy, stopping methane leaks from the oil and gas sector is one of the fastest and most cost-effective ways to reduce pollution and slow warming, and it is essential to meet the administration's science-based climate commitments.

Reducing this pollution is also necessary to protect communities on the frontlines of oil and gas development. Methane leaks from oil and gas equipment are emitted alongside hazardous air pollution, including human carcinogens, and volatile organic compounds that contribute to smog and lead to a wide range of harmful health impacts, including asthma attacks, heart attacks, and early death. Negative health effects from air pollution and climate change are felt most severely by vulnerable populations like children, the elderly, low-income people, and communities of color.

In a recent bi-partisan action that was supported by public health advocates, environmental groups, oil and gas operators, and major utilities, Congress restored oil and gas methane protections put in place by the Obama administration. That action creates an important foundation for EPA to move forward with protective, science-based standards for both new and older sources that build from and strengthen those prior standards. In particular, since the 2016 standards were adopted, technology has advanced and major oil and gas producing states have pioneered new and innovative approaches to reducing methane emissions. Strengthened EPA standards must incorporate these advances by:

- *Enhancing comprehensive requirements to find and fix leaks.* Significant oil and gas emissions come from leaks and equipment failures, which can lead to very large "super-emitter" events. EPA should build on its current standards by requiring more frequent monitoring, enabling operators to quickly identify and fix these large sources of pollution. Indeed, advanced technologies can play an important role in regularly scanning large areas at low cost to capture major leaks. And frequent ground-based monitoring is needed to detect small but widespread leaks. Rigorous monitoring requirements that reduce emissions by 80 to 90 percent (consistent with EPA estimates for quarterly to monthly inspections) must apply comprehensively across *all* facilities.[6] This includes low-production wells, which have been shown to leak at high rates (including at super-emitter levels) and contribute over half of the nation's methane emissions. These wells comprise the majority of the nation's fleet of wells but just a very small percentage of the nation's

[4] Ocko, et al., *Acting rapidly to deploy readily available methane mitigation measures by sector can immediately slow global warming*, 16 Env. Research Letters 054042 (2021), https://doi.org/10.1088/1748-9326/abf9c8

[5] Datu Research, *Find, Measure, Fix: Jobs in the U.S. Methane Emissions Mitigation Industry* (2021); Datu Research, *Advanced Methane Monitoring: Gauging the Ability of U.S. Service Firms to Scale Up* (2021), http://blogs.edf.org/energyexchange/files/2021/08/Advanced-Methane-Monitoring-Survey_Datu-Research_8-10-2021.pdf

[6] Multiple presenters at EPA's Methane Detection Technology Workshops, held August 23-24, 2021, indicated that advanced technologies in combination with traditional ground-based methods are capable of delivering reductions in this range. For example, Triple Crown Resources saw a 90% drop in emission volumes by its third aerial survey. Similarly, ExxonMobil was able to achieve greater than 60% reductions with only three aerial surveys per year.

oil and gas production, and most are owned by larger companies with profits that dwarf the compliance costs of even the most protective regulations.

- *Leveraging technologies that can eliminate emissions*. Requiring zero-emitting pneumatic devices is another effective pollution mitigation practice that states like Colorado have found cost-effective for both new and existing sources. These technologies are readily available and can be deployed across the sector regardless of the availability of onsite electricity, achieving significant emission reductions at low cost.

- *Ending routine flaring.* Flaring is a wasteful practice and a large source of methane, carbon dioxide, nitrous oxide, volatile organic compound, and hazardous air pollution. Capturing natural gas that would otherwise be vented or flared reduces significant amounts of pollution and even generates revenue for operators. Eliminating the practice of routine flaring, as leading states like Colorado and New Mexico have done, is a common-sense step that EPA can and must take now.

- *Applying best practices to all sources.* We also urge EPA to ensure that new standards address polluting activities not previously covered by EPA rules. For instance, in addition to strengthening requirements for sources already covered under the existing EPA safeguards, new standards should also limit emissions from liquids unloading activities and prevent wells from becoming improperly abandoned when they are no longer profitable to the operator. Proper shutdown and plugging requirements for retired wells can ensure these sources do not leak into perpetuity and will prevent closure costs from falling to taxpayers.

- *Enhancing transparency.* Emissions and compliance data must be regularly updated and available in a transparent and easy-to-use public format. Advanced technologies create important, additional opportunities for swift reporting and rapid disclosure. Data transparency can help foster compliance and build the public's trust.

Thank you again for your commitment to reduce climate and health harming pollution from the oil and gas sector. As your agency moves to strengthen emission control requirements for new oil and gas facilities and address existing sources, we respectfully urge you to adopt standards that substantially reduce methane and local air pollution, including protective standards for these key sources. Protective EPA rules that capitalize on readily available means to reduce methane and other pollution are common-sense and required to avoid the worst impacts of climate change and protect frontline communities.

Sincerely,

Air Alliance Houston

Center for Civic Policy

Center for Human Rights and Environment (CHRE)

Citizens Caring for the Future, Permian Basin

Citizens for Clean Air, Grand Junction, CO

Clean Air Council

Clean Air Task Force

Clean Water Action

Climate Action Lower Merion, PA

Climate Advocates Voces Unidas (CAVU)

Conservation Colorado

Conservation Voters of Pennsylvania

Conservation Voters of New Mexico

Dakota Resource Council

Defend Our Future

Diné C.A.R.E.

Earthjustice

Earthworks

Environment Texas

Environmental Defense Fund

Environmental Law & Policy Center

Evangelical Environmental Network

Grand Canyon Trust

Green America

Health Action New Mexico

Hispanics Enjoying Camping, Hunting, and the Outdoors (HECHO)

Institute for Governance and Sustainable Development

Interfaith Power & Light

League of Conservation Voters

Liveable Arlington

Mobilify Southwestern Pennsylvania

Moms Clean Air Force

Mormon Environmental Stewardship Alliance

Mountain Mamas

National Parks Conservation Association

Natural Resources Defense Council

NAVA Education Project

New Mexico Environmental Law Center

New Mexico Interfaith Power and Light

New Mexico Voices for Children

Ohio Environmental Council

Partnership for Responsible Business

PennEnvironment

Philadelphia Solar Energy Association

Physicians for Social Responsibility

Physicians for Social Responsibility Pennsylvania

ProgressNow

ProgressNow New Mexico

Rio Grande International Study Center

Rocky Mountain Farmers Union

San Juan Citizens Alliance

Santa Fe Green Chamber of Commerce

Seeding Sovereignty

Sierra Club

Socially Responsible Investment Coalition

Southern Oregon Climate Action Now (SOCAN)

SWPA Environmental Health Project

Tarrant Coalition for Environmental Awareness

Texas Campaign for the Environment

Texas NAACP

The Center for Coalfield Justice

The Wilderness Society

Turtle Island Restoration Network

United Methodist Women

Waterkeeper Alliance

Western Colorado Alliance

Western Environmental Law Center

Western Leaders Network

Western Organization of Resource Councils

Wyoming Outdoor Council

350 New Mexico

350 Santa Fe