

Congress of the United States
Washington, DC 20515

December 17, 2018

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Docket EPA-HQ-OAR-2017-0483

Dear Administrator Wheeler:

We write in strong opposition to the Environmental Protection Agency's (EPA) proposed rule that would weaken methane and volatile organic compounds (VOCs) emissions standards from new, reconstructed, and modified sources in the oil and gas sector.¹ These changes to the 2016 New Source Performance Standards (NSPS) will lead to increased methane emissions that contribute to climate change and sacrifice public health.

Emissions of methane, VOCs, particulate matter, and hazardous air pollutants from oil and gas operations harm public health. Families living near oil and gas infrastructure are in danger of breathing in hazardous air pollutants like benzene, formaldehyde, and acetaldehyde, plus particulate matter and ground level ozone. These pollutants are associated with a wide range of health impacts including asthma attacks, reduced lung function, chronic respiratory damage, cancer, nervous system damage, and birth defects.² In fact, the EPA acknowledged in the notice of proposed rulemaking that the proposed rule would "degrade air quality and adversely affect health and welfare."³ Furthermore, according to the Fourth National Climate Assessment, increased VOCs emissions will lead to the production of more ozone – the primary component of smog – threatening air quality and increasing cardiovascular and cardiopulmonary health risks caused by climate change.⁴ Continuing to move ahead this proposed rule will directly threaten the health of our constituents by increasing these dangerous emissions.

In addition to harming public health, the increased emissions will worsen climate change. Methane is a very potent greenhouse gas (GHG) with a global warming potential up to thirty-six times that of carbon

¹ Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration; Proposed Rule, 83 Fed. Reg. 52,056 (Oct. 15, 2018).

² "Fossil Fumes: a public health analysis of toxic air pollution from the oil and gas industry." Clean Air Task Force. June 2016. <http://www.catf.us/resources/publications/files/FossilFumes.pdf>

³ Federal Register, Vol. 83, No. 209. Retrieved from <https://www.gpo.gov/fdsys/pkg/FR-2018-10-29/pdf/2018-23570.pdf>

⁴ Fann, N., T. Brennan, P. Dolwick, J. L. Gamble, V. Ilacqua, L. Kolb, C. G. Nolte, T. L. Spero, and L. Ziska, 2016: Ch. 3: Air quality impacts. *The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment.*, U.S. Global Change Research Program, Washington, DC, 69–98. doi:[10.7930/J0GQ6VP6](https://doi.org/10.7930/J0GQ6VP6)

dioxide.⁵ Methane is a key contributor to the global climate crisis and rewriting industry safeguards to permit them to increase emissions is an unwise decision. According to the most recent Intergovernmental Panel on Climate Change (IPCC) special report, the planet has as little as 12 years to take meaningful climate action in order to limit the increase in global average temperature to 1.5°C.⁶ The special report, authored by 132 of the world's preeminent scientists drawing on thousands of peer-reviewed research papers, represents a broad scientific consensus on the latest climate change information that the EPA is willfully ignoring through its regulatory rollbacks. The message is clear: action must be taken now to reduce greenhouse gas emissions from all sources.

Annually, oil and gas extraction operations emit over 8 million tons of methane⁷, which is the equivalent to a year's worth of carbon dioxide emissions from 50 coal fired power plants.⁸ Allowing methane emissions to increase will only accelerate us down the road towards climate change's costly and destructive consequences. Any path to limit the catastrophic effects of global warming must include strong methane controls.

The proposed rule disregards the current scientific understanding of methane pollution and suffers from inaccurate supporting evidence to justify the regulatory changes the EPA is seeking. It completely ignores the findings of a new scientific report, conducted by 24 authors representing 12 universities and two United States Government labs, that found methane emissions from the oil and gas industry in the United States were 60% higher than the amount of previous EPA greenhouse gas inventory estimates.⁹ Using a lower, inaccurate baseline downplays the severity of the methane (and VOCs) emissions problem, artificially lowering the costs associated with weakening pollution standards for oil and gas operations.

The proposed rule would modify the NSPS EPA published in 2016, which directed emissions sources to limit the amount of methane gas being released into the atmosphere.¹⁰ The 2016 NSPS finalized standards that improved existing regulations designed to reduce VOCs and methane emissions by requiring common-sense reporting and best-available technology standards. These standards are designed to reduce fugitive GHG emissions by addressing leaks in the oil and gas infrastructure supply chain which can occur during production, processing, transmission, and storage operations.

According to the EPA, 27 billion cubic feet of natural gas will be recovered by 2025 by implementing the 2016 NSPS.¹¹ The EPA also estimates that the monetized climate benefits of the 2016 NSPS will

⁵ "Understanding Global Warming Potentials." United States Environmental Protection Agency. Accessed December 4, 2018. <https://www.epa.gov/ghgemissions/understanding-global-warming-potentials>

⁶ Intergovernmental Panel on Climate Change. "Global Warming of 1.5 °C." IPCC - SR15. October 6, 2018. Accessed October 10, 2018. <http://ipcc.ch/report/sr15/>.

⁷ "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016." United States Environmental Protection Agency. Accessed December 4, 2018. <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2016>

⁸ "Greenhouse Gas Equivalencies Calculator." United States Environmental Protection Agency. Accessed December 4, 2018. <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

⁹ R.A. Alvarez, et al., *Assessment of methane emissions from the U.S. oil and gas supply chain*, Science 10.1126/science.aar7204(2018).

¹⁰ Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Proposed Rule, Federal Register, Vol. 81, No. 107.


¹¹ Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources; Proposed Rule, Federal Register, Vol. 81, No. 107.


total \$690 million in 2025. Off-the-shelf technology already exists to reduce fugitive emissions from these sources. Deploying this technology will support jobs, allow the industry to capture more natural gas that can be sold to consumers, and protect public health in the process.

Section 111 of the Clean Air Act directs the EPA to limit emissions from categories of stationary sources that cause or contribute to air pollution that endangers public health and welfare.¹² The oil and gas sector is one such category and there is overwhelming evidence that greenhouse gases such as methane pose a major threat to our health, our climate, and our wellbeing. Instead of relaxing emissions standards on new sources, the EPA must instead work to *strengthen* clean air standards to reduce methane emissions and other pollutants from new and existing sources to protect our atmosphere and environment. We reiterate our strong opposition to the proposed rule and urge you to withdraw this proposed rule without delay.

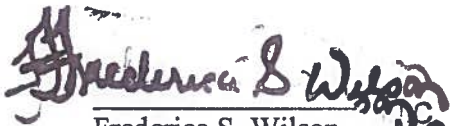
Sincerely,


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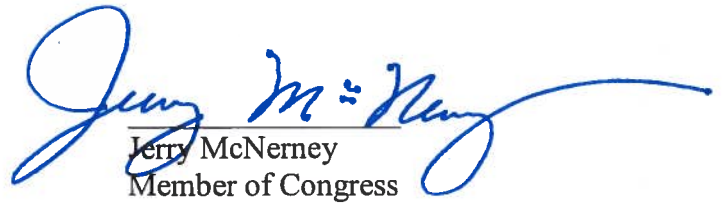

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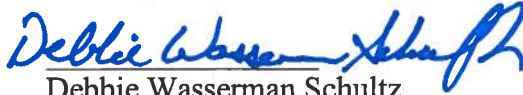

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¹² 42 U.S.C. § 7411(b)(1)(A).


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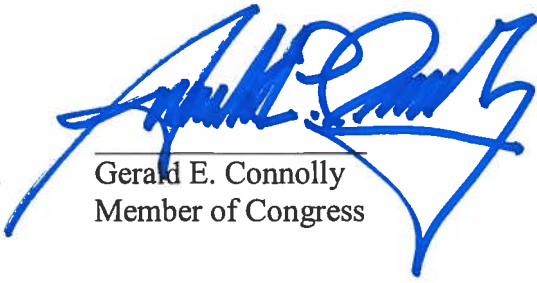

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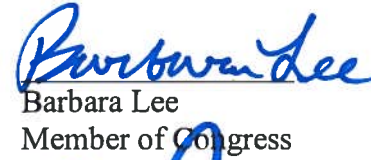
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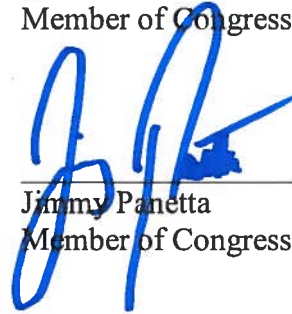
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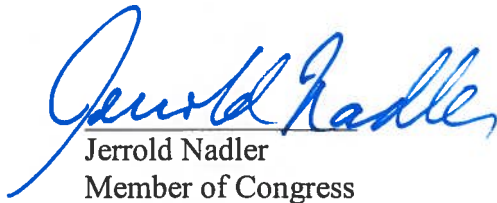
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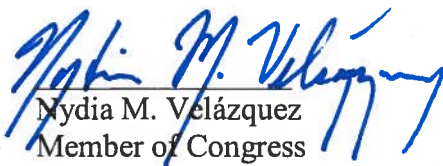
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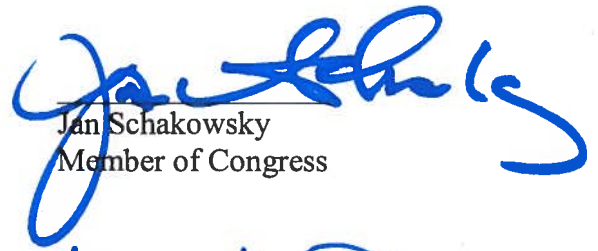



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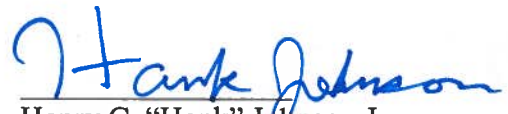

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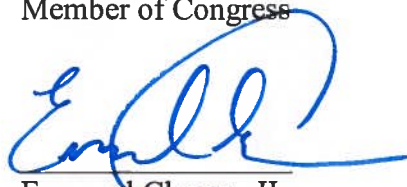

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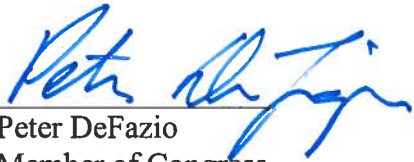

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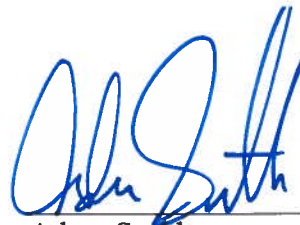

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