

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street N.W.
Washington, DC 20240

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

December 5, 2013

Dear Secretary Jewell and Administrator McCarthy,

We write to offer our support in reducing methane emissions from the oil and gas industry, a key component of President Obama's strategy to meet our climate pollution reduction goals. In presenting his Climate Action Plan to the Nation, the President acknowledged that "[c]urbing emissions of methane is critical to our overall effort to address global climate change." We agree, and would like to work with you to pursue three vital avenues to substantially reduce these harmful emissions through Environmental Protection Agency (EPA) and Department of the Interior regulations of methane emissions from oil and natural gas systems. These systems are the largest source of methane pollution in the U.S., and cleaning them up now is essential to meeting the Administration's commitment to cut greenhouse gas emissions by 17 percent from 2005 levels by 2020.

Current regulations and practices in the oil and gas industry continue to allow for the unnecessary release of large amounts of methane. EPA's most recent U.S. Greenhouse Gas Inventory shows that the oil and gas industry leaked or released approximately 8.4 million metric tons of methane in 2011, comparable to the CO₂ emissions of at least 60 coal-fired power plants. These estimates are conservative: methane's impacts are even more powerful in the near term, and recent research suggests that EPA's figures may be far too low.¹ In addition, methane and other volatile organic compounds (VOCs) in the leaked gas contribute to ground-level ozone, leading to respiratory illnesses and related deaths and the loss of millions of dollars worth of agricultural products each year. Fortunately, as EPA's Natural Gas Star program and others have shown repeatedly, significant reductions in these emissions are within reach. Methane emissions from leaks, deliberate release of gas from oil and gas wells, and emissions from compressors, processing equipment, tanks, and pipelines can be reduced with off-the-shelf technologies. In many cases these technologies pay for themselves quickly, even at today's low natural gas price.

We commend EPA for updating its VOCs performance standards for this industry in 2012, but the job is far from finished. While some reductions in methane emissions will be achieved as a co-benefit of these 2012 rules, many emission sources are not adequately addressed, such as the

vast network of equipment that was installed before those rules went into effect. EPA needs to take immediate steps to produce regulations to directly reduce methane pollution from new and existing equipment from this industry.

The Department of the Interior has 33-year-old policies that need updating to prevent unnecessary and wasteful methane pollution. We urge the Department to update its methane controls quickly. Leaking, venting, and flaring of methane from oil and gas sources is a large waste of a valuable energy resource, and the Mineral Leasing Act of 1920 requires the Bureau of Land Management to include provisions in its leases that ensure producers will “use all reasonable precautions to prevent waste of oil or gas developed....”² Reducing this waste would increase royalties paid to the government and reduce dangerous pollution.

Finally, although the Department of the Interior’s Bureau of Ocean Energy Management (BOEM) is now responsible for controlling air pollution from offshore Arctic oil and gas sources, BOEM’s current regulations were developed for the Gulf of Mexico. BOEM must develop rules specific to the challenging and fragile environment of the Arctic. Additionally, some of BOEM’s current rules are 30 years out of date, even for the Gulf facilities they were meant to address. More than 17 billion cubic feet of gas is flared offshore.³ That amount is equivalent to almost half of the total gas produced offshore in California. BOEM must modernize these regulations not only to reflect achievable emission controls, but also to recognize the very real differences between oil and gas operations in the Arctic and those in the Gulf of Mexico.

We look forward to supporting EPA and the Department of the Interior in their efforts to curb methane pollution from the oil and natural gas industries. Cleaning up methane emissions is a critical near-term step toward implementation of President Obama’s new Climate Action Plan and continued U.S. leadership on climate protection and healthier air.

Sincerely,

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The Honorable Neil Kornze
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The Honorable Janet McCabe
Acting Assistant Administrator, Office of Air and Radiation
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¹ Karion, A., et al. 2013. Methane emissions estimate from airborne measurements over a western United States natural gas field. *Geophys. Res. Lett.*, 40, 4393–4397, doi:[10.1002/grl.50811](https://doi.org/10.1002/grl.50811).

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² 30 U.S.C. §187.

³ U.S. Energy Information Administration. Natural Gas Gross Withdrawals and Production. http://www.eia.gov/dnav/ng/ng_prod_sum_a_epg0_vgv_mmcf_a.htm.