

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

May 20, 2015

Dear Administrator McCarthy,

In January, the administration took an important step by committing to a suite of actions to reduce harmful methane emissions from the oil and gas industry, the largest industrial source of this pollution. It is urgent that EPA take immediate protective action for the health of our communities and families.

As EPA moves forward with the initial step that the administration announced, we urge the agency to propose strong standards this summer to minimize methane pollution from new and modified sources in the oil and gas industry and also provide a solid foundation for required standards reducing methane emissions from a broad range of existing sources. Comprehensive and rigorous methane standards covering, at a minimum, the sources currently subject to VOC standards as well as those examined in the five 2014 EPA white papers will deliver important public health and environmental benefits. Effective curbs on methane emissions from new, modified, and existing sources are critical to provide much needed clean air protections to local communities, to meet EPA's obligations under the Clean Air Act, and to meet the administration's international climate goals.

These critical standards should include:

- **Requiring leak detection and repair across the oil and natural gas sector.** Under the current VOC standards EPA requires leak detection and repair only at some gas processing plants, leaving the vast majority of oil and natural gas equipment leaks unaddressed. EPA should require rigorous methane leak detection and repair at all types of oil and natural gas facilities, including frequent, direct monitoring requirements using proven technologies like infrared cameras. The standards should require swift repair and incentivize continuous improvement of monitoring technologies.
- **Extending green completion requirements to oil wells that produce significant amounts of natural gas.** EPA currently requires reduced emission completions (also known as green completions) only for VOC emissions from "gas wells," which are defined as wells drilled "principally" to produce natural gas. This definition, however, omits oil wells that produce significant amounts of pollution. The number of such wells has expanded rapidly in recent years due to shifting market fundamentals. The new standards should cover methane emissions from gas wells, and also apply the same commonsense measures to methane emissions from oil well completions. The agency should also require control of vented methane emissions associated with ongoing production at those sources.
- **Reducing emissions from liquids unloading.** EPA's latest inventory shows significant methane emissions associated with well venting from liquids unloading, a process operators use to remove liquids that accumulate during production. As EPA's White Papers demonstrate, highly cost-effective technologies are available to reduce emissions from liquids

unloading, and EPA should establish strong methane standards to deploy these proven technologies and reduce liquids unloading emissions.

- **Reducing emissions from pneumatic pumps.** Though EPA has established VOC standards for certain pneumatic controllers, pneumatic pumps are a significant source of methane emissions that are not currently subject to federal requirements. Available technologies such as solar-powered chemical injection pumps can substantially reduce emissions from pneumatic pumps and we urge EPA to establish rigorous methane standards for all pneumatic pumps.
- **Extending common-sense, clean air standards to equipment across the oil and natural gas supply chain.** Currently, standards apply only to equipment in certain upstream segments of the oil and natural gas supply chain, allowing unlimited pollution from equipment in other segments. The same control technologies are cost-effective and technically feasible to apply across the oil and natural gas supply chain and, accordingly, we urge EPA to establish methane standards extending clean air equipment protections to all such sources. In particular, the Agency should ensure that methane standards for compressors and pneumatic controllers apply throughout the sector, including at wellheads and in the transmission and storage segment.

We greatly appreciate your leadership in protecting public health and addressing harmful climate pollution. We urge you to establish protective safeguards addressing methane pollution from new and modified sources in the oil and natural gas sector, including the above-described sources, standards that will establish a strong foundation for required actions to address methane and other harmful emissions from existing infrastructure. These protections are urgently needed for the health of our communities and families.

Sincerely,

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*(Please see the attached list of endorsers).*

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