

January 31, 2022

Dear Administrator Regan:

As organizations that care about public health as well as the fate of our planet's climate, we greatly appreciate the administration's commitment to address methane emissions from the oil and gas sector, and write to support strengthening the Environmental Protection Agency's Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources for the Oil and Natural Gas Sector to reduce methane air pollution from new and existing sources of oil and gas development as much and as quickly as possible.

Methane, the principal component of natural gas, is over 80 times more potent than carbon dioxide over a 20-year time period. The best science shows that methane pollution from oil and gas facilities in the United States is far worse than current, self-reported estimates suggest. Recent studies found methane emissions levels to be 60% greater than currently estimated by the Environmental Protection Agency. In addition to methane, smog-causing volatile organic compounds (VOCs) and toxic hazardous air pollutants (HAPs), including cancer-causing agents, are released in significant quantities throughout the oil and gas sector. Ozone smog from oil and gas industry pollution is associated with 1.1 million summertime asthma attacks in children, and over 9 million people face a cancer risk that exceeds EPA's one-in-a-million threshold level of concern due to emissions from oil and gas facilities.

While the best and most just solution to the climate crisis is to fully transition away from fossil fuels and embrace a clean energy economy, utilizing the full power of the Clean Air Act now will reduce harm to frontline communities living with oil and gas development and help curb further climate change. Until we manage the decline of fossil fuels and transition to a cleaner, more equitable energy system, we urge much-needed improvements to the current proposed rule in order to more fully protect human health and the environment from the destructive impacts of oil and gas development. 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 midcentury.

We urge the EPA to:

- Strengthen its monitoring requirements to require frequent leak detection and repair inspections at all wells. EPA has recognized in its proposal that a "low production" exemption is not appropriate. However, under the current proposal, operators that calculate lower potential emissions (less than 3 tons per year of methane) could avoid all monitoring after just one initial inspection. Rigorous monitoring requirements that reduce emissions by 80 to 90 percent (consistent with EPA's estimates for quarterly to monthly inspections) must apply comprehensively across all facilities. This includes wells with a calculated potential to emit below 3 tons per year. These calculations are based on emission factors that very likely underrepresent the true extent of fugitives originating

from these wells, and do not account for equipment failures or malfunctions that can lead to super-emitting events. Thus, EPA should not provide special and more lenient requirements for these wells, but should mandate regular monitoring at all wells, regardless of their calculated potential to emit.

- Eliminate routine flaring. EPA's proposal does not go far enough to address pollution from flaring. EPA's final rule must prohibit the practice of routine flaring at oil and gas sites. When companies rush to extract oil, some forgo investments necessary to capture and sell gas and instead burn it as a waste product, emitting a host of climate and health-harming pollutants. Flaring is a wasteful practice and a large source of methane, carbon dioxide, nitrogen oxides, VOCs, and HAPs. Capturing natural gas that would otherwise be vented or flared reduces significant amounts of pollution and even generates revenue for operators. EPA must eliminate flaring except in emergency situations. EPA must also ensure that flares are operating properly and are frequently inspected to ensure they are lit and operating at maximum efficiency.
- Incorporate community monitoring that allows frontline communities and other observers to engage with regulators when there is documented evidence of pollution or ongoing emissions. EPA should accept evidence presented by communities, as well as monitoring results from third parties. This will help the agency enforce comprehensive rules on the millions of wells and other emission sources in the oil and gas sector and prioritize fixing major leaks that are harming nearby communities more quickly.
- Require monitoring and plugging of abandoned wells that are leaking methane. According to the Reuters investigation, which conducted a comprehensive review of the available data in 2020, orphaned and abandoned wells in the United States were collectively responsible for emitting 281,000 tons of methane into the atmosphere in 2018. While orphaned wells no longer have an identifiable owner, abandoned wells are typically defined as an unproductive well with a known owner/operator. EPA should require twice-a-year monitoring at idle and unplugged wells, while also including a requirement for companies to submit comprehensive well closure plans in order to properly cap wells at their end of life.

These important gaps on critical issues must be addressed to prioritize public health, protect frontline communities, and hold oil and gas companies accountable. Where EPA has proposed protective standards, such as rules eliminating the use of intentionally-polluting pneumatic controllers and requiring a transition to zero-emitting solutions, the agency should follow through and finalize those strong standards. Methane pollution from the oil and gas sector is accelerating the pace of climate change and harming the health of our families and communities — and it is a problem only getting worse. Oil and gas infrastructure is also next to or nearby some of our most treasured natural and cultural sites on public lands, areas warming at nearly twice the rate of the rest of the country and experiencing dramatic impacts from a changing climate. There is no time to waste, and we cannot miss out on this opportunity to create the strongest standards possible to limit pollution from the oil and gas industry.

Rules to cut methane emissions are an important first step on the road to what is truly needed to stave off climate catastrophe. A June 2021 report from the Intergovernmental Panel on Climate

Change (IPCC) underscores the urgent need for swift, protective action to reduce methane emissions. They identified methane pollution reduction from the oil and gas industry as a necessary step toward mitigating these harmful impacts and limiting warming to 1.5 degrees Celsius above pre-industrial temperatures. But, even with the best regulations in place, oil and gas facilities will continue to pollute, and continued reliance on these energy sources will put us on a path toward a dangerously warmer planet. We must couple strong methane regulations to control air pollution from oil and gas development with throwing the full weight of our resources behind decarbonizing our economy to address the climate crisis.

Signatories:

350 New Orleans
Alabama Interfaith Power & Light
Alamosa Riverkeeper
Alliance of Nurses for Healthy Environments
Altamaha Riverkeeper
Animas Riverkeeper
Apalachicola Riverkeeper
Arizona Interfaith Power & Light
Arundel rivers Federation
Assateague Coastal Trust
Atchafalaya Basinkeeper
Badlands Conservation Alliance
Bayou City Waterkeeper
Big Blackfoot Riverkeeper, Inc.
Black Warrior Riverkeeper
Broad Riverkeeper
Cahaba Riverkeeper
Calusa Waterkeeper
Cape Fear River Watch
Catawba Riverkeeper Foundation
Central California Asthma Collaborative
Chattahoochee Riverkeeper
Chesapeake Climate Action Network
Chispa TX
Clean Air Council
Clean Energy Action
Clean Energy Now Texas
Clean Water Action
Coastal Carolina Riverwatch
Collier County Waterkeeper
Columbia Riverkeeper
Cook Inletkeeper
Coosa River Basin Initiative/Upper Coosa Riverkeeper

Dakota Resource Council (Fort Berthold POWER)
Delaware Interfaith Power and Light
Deschutes Estuary Restoration Team
Earthworks
Elders Climate Action
Emerald Coastkeeper
Empower our Future - Colorado
Environment in the Public Interest
Environmental Law & Policy Center
Environmental Stewardship
Evergreen Action
FracTracker Alliance
Franciscan Action Network
Friends of Casco Bay
Friends of the Earth
Gas Free Seneca
Georgia Interfaith Power and Light (GIPL)
Green River Action Network
Green Riverkeeper
GreenLatinos
Gunpowder RIVERKEEPER
Hackensack Riverkeeper
Haw River Assembly
Healthy Gulf
High Tide Foundation
Hispanic Access Foundation
Hispanic Federation
Hudson Riverkeeper
Hurricane Creekkeeper
Irving Impact
Islamic Society of North America (ISNA) Office for Interfaith and Community Alliances
Kentucky Riverkeeper
Kissimmee Waterkeeper
Kootenai Environmental Alliance
LA Waterkeeper
Lackawanna River Conservation Association
Lake Worth Waterkeeper
League of Conservation Voters
League of Women Voters Pennsylvania
Liveable Arlington
Living Rivers & Colorado Riverkeeper
Local Environmental Action Demanded (LEAD) Agency, Inc.
Long Island Soundkeeper
Los Padres ForestWatch

Louisiana Environmental Action Network
Lower Susquehanna Riverkeeper Association
Milwaukee Riverkeeper
Minnesota Interfaith Power & Light
Missouri Confluence Waterkeeper
Mobile Baykeeper
Moms Clean Air Force
Montana Interfaith Power and Light
Mountain Watershed Association
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
New Energy Economy
NPCA
Ogeechee Riverkeeper
Oil Change International
Okefenokee Conservation, LLC
Our Climate
Oxfam America
Peconic Baykeeper
Private Equity Stakeholder Project
Public Citizen
Pueblo Action Alliance
Puget Soundkeeper
Rachel Carson Council
Raritan Baykeeper, Inc (dba NY/NJ Baykeeper)
Raritan Riverkeeper
RE Sources
Riverkeeper
Rivertown Coalition for Clean Air & Water
Rogue Riverkeeper
San Antonio Bay Estuarine Waterkeeper
San Diego Coastkeeper
San Luis Obispo Coastkeeper
Satilla Riverkeeper
Savannah Riverkeeper
Save The Colorado
Save The River Upper St Lawrence Riverkeeper
Seneca Lake Guardian
Sierra Club
Snake River Waterkeeper
Society of Native Nations
South Platte River Waterkeeper
Southern Alliance for Clean Energy

Spokane Riverkeeper
St. Johns Riverkeeper
Stop SPOT and Gulflink
Suncoast Waterkeeper
Suwannee Riverkeeper
Tennessee Riverkeeper
Texas Campaign for the Environment
Texas Grassroots
Texas Grassroots Network
Texas NAACP
The Climate Center
The Wilderness Society
Three Rivers Waterkeeper
Tualatin Riverkeepers
Turtle Island Restoration Network
Twin Harbors Waterkeeper
Union of Concerned Scientists
United Methodist Women
Upper Allegheny WK affiliate
Upper Green River Network
Upper Missouri Waterkeeper
Wabash Riverkeeper
Watauga Riverkeeper
Waterkeeper Alliance
Waterkeepers Chesapeake
Waterway Advocates
West Virginia Rivers Coalition
Winyah Rivers Alliance
Yuba River Waterkeeper