

Gina McCarthy
EPA Administrator
<http://www.regulations.gov>.

RE: Docket ID Number EPA-HQ-OAR-2010-0505

October 16, 2015

Ms. McCarthy

Please accept the following as comment on the EPA's proposed rules on methane emissions from oil and natural gas facilities, Docket ID Number EPA-HQ-OAR-2010-0505, as submitted by the signed-on Colorado County Commissioners.

The oil and gas industry is carelessly wasting millions of tons of gas and leaking toxic chemicals into the air that harm health, waste an important national resource and speed up climate change. This does not have to happen; low-cost safeguards already exist to plug the leaks and stop this pollution.

EPA has proposed rules that will "help combat climate change, reduce air pollution that harms public health, and provide greater certainty about Clean Air Act permitting requirements for the oil and natural gas industry." These national rules, like those already in place in Colorado, make sense to protect public health and our economy.

Methane pollution puts Colorado families at risk. Methane releases can be accompanied by harmful pollutants that have significant public health consequences. This includes toxic chemicals like benzene, which are linked to cancer, and other smog-forming pollutants that can create ground-level ozone, which can lead to asthma. Especially susceptible to this are our children and elderly population.

Methane leaks are an unnecessary waste of a saleable commodity. It makes no economic sense and is irresponsible for operators to vent or flare a saleable commodity into the air when it can be captured and sold, increasing both private and public sale revenues. Capture makes good business sense.

Methane pollution is threatening the climate. Curbing methane pollution is critical because methane is over 80 times more potent a greenhouse gas than carbon dioxide. If federal action isn't taken, methane pollution from the oil and natural gas industry is projected to increase by 25 percent nationally over the next 10 years.

In 2014, Colorado chose to lead the way on this issue, becoming the first state to regulate methane pollution from the oil and natural gas industry. Since adoption and implementation of these regulations by the state, there has been no fiscal downside to the industry, and more benefit to the Colorado's citizens. While what the EPA is proposing is a good, necessary first step, I would encourage the EPA to strengthen its draft to mirror what Colorado has in place - including regulating existing sources of methane pollution. Regulation works here and will work nationally. Methane pollution is a national problem that requires a national response.

Thank you for taking the time to consider these comments and requests.

Sincerely,

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