

December 4, 2015

To EPA:

As representatives of local governments and school boards across Colorado we write to request your strong support for federal action to reduce methane pollution and waste from the oil and gas industry. Action from both the U.S. Environmental Protection Agency and Bureau of Land Management is crucial to ensuring that pollution and waste of natural gas is minimized while state and local governments recoup the maximum funding possible to offset negative impacts to local communities.

Methane pollution represents a significant economic loss to the state of Colorado and the nation. A recent report by the Western Values Project found that Colorado lost out on an estimated \$36 million since 2009 and \$8 million in 2013 alone due to leaks and intentional venting and flaring of natural gas on public lands. Our state sorely needs these royalties to support our school systems and other local government needs such as infrastructure improvements in the communities impacted by drilling the most.

While Colorado is rightly proud of our national-leading efforts to combat methane pollution and waste, federal action is necessary to level the playing field and help address this problem across the U.S. Nationwide, Taxpayers for Common Sense found almost \$70 million in lost federal royalties from venting and flaring natural gas from 2006 to 2013, with annual losses increasing during that period. Every molecule of gas that is captured is a molecule that can be sold and put to good use, and one that would result in state and federal royalties. Capturing methane leaks, ending venting and reducing flaring therefore helps the taxpayers and vital state and local services.

This wasted natural gas is also a significant public health issue. When methane is released into the air, this often occurs along with harmful pollutants that seriously impact human health. These include toxic chemicals like benzene, which are linked to cancer, and other smog-forming pollutants that can trigger asthma.

Curbing methane pollution is also critical as a part of our nation's efforts to combat climate change. Pound for pound, methane is more than 80 times more potent than carbon dioxide in the first 20 years after its release, and is already responsible for a quarter of man-made warming we are experiencing today according to the Intergovernmental Panel on Climate Change. Federal action is necessary because without it, this problem is only projected to get worse, despite voluntary industry efforts. Without strong action, methane pollution from the oil and natural gas industry is projected by EPA to increase approximately 25 percent over the next 10 years.

Luckily, sensible, cost effective solutions to this problem exist and are readily available. A report by the respected business consulting firm ICF found that the oil and gas industry could cut methane emissions by 40% at an average annual cost of less than one penny per thousand cubic feet of produced natural gas by adopting available emissions-control technologies and operating practices. In fact in Colorado since methane rules were adopted, Colorado's economic growth has exceeded projections. The state regulations demonstrate that smart environmental policy can go hand in hand with economic growth. It is essential that new BLM and EPA standards deploy these proven, cost-effective methods for minimizing waste and harmful air pollution – both at newly developed oil and gas facilities, and at existing infrastructure where possible.

Draft EPA rules that are currently out for public comment are a good first step, but they fall short of the Colorado model in a few key areas. We ask that you help us encourage EPA to take a stronger look at the Colorado rules particularly regarding requiring frequent (at least quarterly) leak inspections at drilling sites and in terms of including requirements to reduce pollution from existing sources. And furthermore we need your help to ensure the BLM rule currently being considered by the Office of Management and budget does not mimic these shortcomings.

For the reasons stated above we strongly request you help in supporting and improving new EPA and BLM rules designed to reduce wasteful methane leaks, venting and flaring across the U.S.

Sincerely,

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