

March 10, 2016

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Administrator McCarthy,

We write today to encourage the Environmental Protection Agency to finalize standards to limit methane emissions in the oil and gas sector from new and modified sources. Colorado finalized first-in-the-nation methane controls for oil and gas in 2014, and Pennsylvania and California are now taking steps toward regulating sources of methane emissions. We are pleased to see the EPA pursuing a complementary suite of regulations for new and modified sources and urge you to take further action to regulate existing sources of methane emissions this year. Reducing methane emissions from this industry is a cost-effective way to combat climate change, improve public health and reduce the waste of natural gas.

According to the EPA, more than \$1 billion worth of natural gas is lost throughout the oil and gas supply chain annually. And without limits on methane pollution, the agency projects a 25 percent increase in leakage over the next 10 years. When methane is leaked, so too are other dangerous air pollutants, including smog-forming volatile organic compounds (VOCs) and air toxics including benzene, toluene, ethylbenzene and xylene. These pollutants are associated with a range of health impacts, including reduced lung function, asthma attacks, hospitalization and chronic respiratory damage. Reducing methane emissions will also lead to reduction of these pollutants, lessening exposures and health risks for communities near oil and gas development. As the methane leak at a natural gas storage facility in Aliso Canyon, California highlighted, methane emissions can have a direct, severe impact on the lives of our constituents.

EPA estimates that its proposal will avoid the equivalent of 7.7 to 9 million metric tons of carbon dioxide emissions by 2025, with net climate benefits of \$120 to \$150 million. Importantly, this doesn't take into account the health benefits of reductions in other pollutants.

In addition to the health and climate impacts of the rule, there are also economic benefits. Off-the-shelf technology already exists to reduce air pollution from oil and gas sources. It is readily available and affordable and supports jobs in the burgeoning methane mitigation industry.

Finally, Colorado's recent rules cover new as well as existing sources, and we would like to see EPA use its authority under Section 111(d) of the Clean Air Act to regulate existing sources this year. Reducing methane from existing sources is the necessary next step in order to meet the Administration's goals under the Climate Action Plan. Acting on existing sources now will result in significant savings, and provide a level playing field going forward. We also suggest that EPA examine methane emissions downstream in the oil and gas sector to see if further reductions are achievable.

Thank you for proposing standards to limiting methane emissions from the oil and gas sector. We look forward to working with you to finalize a suite of methane rules this year.

Sincerely,

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