

July 20, 2016,

Gina McCarthy, EPA Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy,

We thank you for your leadership on creating America's first-ever nationwide limits on methane emissions from new industrial oil and gas facilities. We also welcome the Environmental Protection Agency's commitment to use its authority under the Clean Air Act to address existing sources of methane emissions from the oil and gas sectors, as well as other sources of these emissions. The mounting costs associated with these emissions are real and urgent and we encourage the EPA to move those standards forward without delay.

Environmental Entrepreneurs (E2) is a national, nonpartisan group of business leaders who advocate for smart policies which drive innovation in business while protecting the environment. Our members have founded or funded more than 2,500 companies, created more than 600,000 jobs, and manage more than \$100 billion in venture and private equity capital.

As business leaders, we understand that an increase in greenhouse gas emissions is a threat to our local, state, and national economies, as climate change contributes to crop losses, flood damage, catastrophic fires and other climate-related disasters. Methane is 80 times as potent as carbon dioxide.

The production of natural gas is the largest industrial source of methane emissions in the U.S. It is estimated that the production of natural gas, and the corresponding emissions, will increase in coming years, making it critical to put safeguards in place now. Instead of accepting the profligate waste of this resource through leakage, we support adopting economically sensible measures to stem the escape of methane gas from oil and gas operations and the indirect costs that waste imposes on the American economy.

President Obama set a goal of reducing methane emissions from the oil and gas sector 40 to 45 percent from 2012 levels by 2025, and has taken the first steps to reduce methane emissions from new and modified sources with this most recent rulemaking. However, standards on new and modified sources will not be enough to reach the 2025 goal. A 2014 report by ICF International projected that existing sources (existing in 2011) will be responsible for almost 90 percent of methane emissions from the oil and gas industry in 2018.^[1] Now that the Administration has laid the path for existing sources, we urge EPA to act without delay to put in place cost-effective and sensible standards for existing sources.

Methane mitigation makes sense economically. It is estimated that the U.S. loses more than \$1 billion worth of natural gas every year through methane leaks and intentional releases. The technologies to reduce and stop these leaks and releases are cost-effective and easy to

implement.

Curbing the practice of intentionally releasing gas from oil and gas wells through an EPA standard is also a commonsense way to reduce methane emissions. Collectively these actions would create an increase in demand for positions like mechanical and electrical engineers, technicians, and welders. Currently, methane mitigation industry firms operate at more than 530 locations in 46 states, with small firms driving the industry. In total, there are nearly 400 service and sales locations; more than 100 are manufacturing and assembly sites.

Our organizations look forward to supporting the effort to put safeguards in place to reduce emissions from the largest source of methane in the U.S. Please do not hesitate to contact us if we can be of assistance to you and your agency.

Sincerely,

[1] https://www.edf.org/sites/default/files/methane_cost_curve_report.pdf

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