

August 2, 2016

Administrator Gina McCarthy  
Environmental Protection Agency  
Office of the Administrator  
Mail Code 1101A  
1200 Pennsylvania Ave, N.W.  
Washington, DC 20460

Re: EPA's Information Collection Request on Existing Sources of Methane Pollution

Dear Administrator McCarthy,

As organizations who care about public health and the fate of our planet, we write regarding the EPA's "Information Collection Request" (ICR) to seek data from oil and gas companies for the purposes of regulating existing sources of methane pollution. While we appreciate efforts taken thus far by this administration to curb methane pollution, the national actions proposed or announced to date will still leave methane pollution from the vast majority (at least 75%) of the wells and oil and gas infrastructure in use today virtually unregulated. Therefore, swift action to address emissions of this potent climate pollutant from its largest source is essential.

While no amount of regulation can ever make fracked gas a clean energy source, we support efforts to capture methane and repair leaks along the oil and gas supply chain. These important pollution controls will not only help stave off catastrophic climate change, but will also protect communities from the harm imposed by the oil and gas industry. This ICR can round out the already-robust technical foundation that the administration has on the emission sources and mitigation options available to the oil and gas industry, and can help ensure that a rulemaking to address existing sources is comprehensive and protective.

Until we are able to entirely end our reliance on fossil fuels, we support EPA's efforts to protect frontline communities from the hazards of oil and gas development and help curb further climate change. Methane, the principal component of natural gas, is 87 times more potent a greenhouse gas than carbon dioxide over a 20-year time period. In addition, smog- and soot-forming volatile organic compounds (VOCs) and hazardous air pollutants (HAPs, or air toxins), such as benzene and xylene, are released in significant quantities during oil and gas development. Communities bear the brunt of this dangerous air pollution and deserve to be able to breathe cleaner and safer air as we swiftly transition to a truly clean energy economy.

As EPA finalizes its draft ICR, we urge the agency to take into consideration the following:

1. Given the urgent need for industry-wide reductions of methane pollution, volatile organic compounds, and air toxins, EPA should move as expeditiously as possible to gather a robust data set through the ICR.
2. At the same time, the ICR should be designed to be as comprehensive as possible, capturing information from all pollution sources across the oil and gas supply chain — from production through distribution — not just data from sources or practices for which federal standards already exist.
3. EPA needs additional data to make sure that communities get the health protections they need. EPA should ensure that the ICR collects robust, accurate and specific information to describe the potential for individual VOCs and other toxic air pollutant emissions.
4. Consistent with section 114 of the Clean Air Act, EPA should make this data broadly available to the public.
5. Lastly, while this data collection effort is underway, we urge the agency to continue to assess effective policy-design approaches to minimize emissions from existing sources relying on the significant information already available and that the administration used to develop EPA's new source performance standards for methane and VOCs, BLM's methane and waste reduction rule, and the control techniques guidelines for oil and gas sources in ozone-constrained areas.

Through this ICR, EPA should round out its understanding of the myriad air pollution sources that are present across the oil and gas supply chain so as to effectively craft standards to cut these emissions. Specific sources that are known to emit methane that EPA should include in its ICR are:

- Leaks from all aboveground facilities, including “city gates” and other facilities in the distribution segment of the natural gas industry.
- Pneumatic controllers and pumps of all types, including intermittent-bleed controllers, “low-bleed” pneumatic controllers, and gas-assisted glycol dehydrator pumps.
- Tanks of all types, including tanks at all sites that store oil, condensate, or produced water, as well as tanks that have lower expected emissions.
- Reciprocating compressors at all sites, including those at well pads.
- Centrifugal compressors at all sites, including those at well pads.
- Offshore oil and gas production platforms.
- Liquids unloading operations from both vertical and horizontal wells.
- Blowdown events from wells or other equipment.
- Venting and flaring of associated gas from oil wells, and flares at other types of facilities.
- Open impoundments for handling produced water, and disposal facilities for produced water utilizing evaporation and/or percolation.
- Compressor engine exhaust, where methane is likely present from incomplete combustion of fuel gas.
- Acid gas removal units and dehydrators throughout the sector.

To safeguard communities living with the burden of existing oil and gas infrastructure and to meet President Obama's Climate Action Plan goal of reducing oil and gas sector methane emissions 40-45% below 2012 levels by 2025, EPA *must* move quickly to create rules for existing oil and gas facilities both upstream, midstream and downstream. While we support a quick and robust ICR process, and reiterate the urgent need for strong and protective methane standards for *all* oil and gas sources, we emphasize even more strongly the need for a rapid and economy-wide transition to clean, renewable energy sources while leaving fossil fuels in the ground.

While reducing methane emissions from the oil and gas industry will not make drilling and fracking safe, or gas "clean," we support EPA's effort to address the climate crisis exacerbated by the fracking boom and reduce harm to communities living with the burden of the oil and gas industry. We urge the EPA to move as quickly as possible to collect all of the information needed to issue strong standards that protect public health and tackle climate change. Regulating existing sources of air pollution, coupled with an immediate shift to an economy that depends on clean, renewable energy -- not fossil fuels -- are steps that must follow in order to the avoid the most devastating effects of catastrophic climate change.

Sincerely,

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