

May 25, 2017

Administrator E. Scott Pruitt
Office of the Administrator, Code 1101A
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Reconsideration and Stay of EPA's Methane New Source Performance Standards for the Oil and Natural Gas Sector

Dear Administrator Pruitt:

We write to convey our opposition to your April 18 decision to reconsider important provisions of the currently effective performance standards for new and modified sources in the oil and natural gas sector, which will reduce harmful methane, smog-forming pollution, and toxic emissions from these sources. We also oppose your stated intent to stay those provisions.

In a letter you sent to several oil and gas industry associations on April 18, you indicated that you intend to reconsider and stay requirements to find and fix equipment leaks, promising that "sources will not need to comply with these requirements while the stay is in effect." The current compliance date for these requirements is June 3, 2017. This stay will increase health risks for numerous Americans living in close proximity to wells and other facilities, which will emit significant amounts of additional hazardous and smog-forming pollution that would otherwise have been reduced. The stay will also add thousands of tons of methane, a highly potent greenhouse gas, to an atmosphere already overburdened with heat-trapping pollutants. Further, the stay will cause the waste of substantial volumes of valuable natural gas.

The leak detection and repair provisions that your letter threatens to stay are the cornerstone of EPA's methane standards. They require oil and gas operators to use proven, common-sense solutions to monitor their infrastructure and equipment in order to identify and then repair components that are leaking natural gas (the predominant component of which is methane) into the air. The agency projects that the leak detection and repair requirements alone will deliver over half of the rule's methane reductions and nearly 90 percent of its toxic air pollution reductions, including known human carcinogens like benzene. These protections also will result in substantial reductions of volatile organic compounds, which form ground-level ozone, the primary component of smog.

Suspending these requirements would allow thousands of newly-drilled or modified wells and compressor stations across the country to continue leaking large volumes of this harmful air pollution, posing serious health risks to communities, families, and workers. Such an action would leave the people living and working in these

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