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November 25, 2019

Dear Administrator Wheeler,

As organizations who care about public health and the fate of our planet, we write to oppose the Environmental Protection Agency's attempt to roll back the requirements of the Emission Standards for New, Reconstructed, and Modified Sources for the Oil and Natural Gas Sector, 40 C.F.R. part 60 subpart OOOOa. EPA's attempt to roll back these important standards and block standards for existing sources is unwarranted, and will adversely impact those people who live near new oil and gas development. These important pollution controls are needed to protect

communities from oil and gas industry air pollution, as well as help stave off catastrophic climate change.

Methane, the principal component of natural gas and a potent greenhouse gas, is 87 times more potent than carbon dioxide over a 20 year time period. In addition, smog-causing volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) such as benzene and xylene, are released throughout the oil and gas development process from initial drilling, through transmission, to end use - even if that end use is overseas.

Communities living near oil and gas development bear the brunt of the dangerous air pollution from fracking-enabled oil and gas extraction, and deserve to be able to breathe cleaner air. Without these important safeguards ¹in place and absent existing source standards, methane and other harmful substances will leak, unchecked, from wells and compressor stations. EPA's proposed rollback of these commonsense protections and claim that it will not reduce pollution from existing oil and gas sources will cause imminent and irreparable harm to the public, particularly to children. This air pollution has real impacts on the ground -- nationally, there are more than 750,000 summertime asthma attacks in children under the age of 18 due to ozone--the primary component of smog-- resulting from oil and gas pollution.²

In addition to reducing harm to communities living with the burden of the oil and gas industry, methane pollution standards can help address the climate crisis exacerbated by the fracking boom. A quarter of the global warming we're experiencing is caused by methane emissions, and the emissions from the oil and gas industry are at least 60% higher than previously measured. This makes methane emissions from oil and gas drilling a far greater threat than previously thought. Regulating methane 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 avoid the most devastating effects of catastrophic climate change.

The harms caused by not limiting methane emissions are especially disturbing because of the low-cost, commonsense nature of the rules being rolled back. Several oil and gas producing states already have protections in place like those the EPA now seeks to end, which demonstrates the feasibility and effectiveness of these standards. In addition to state rules that are already in place, several major oil and gas companies have come out in favor of federal methane regulations, including BP and Exxon Mobil. Royal Dutch Shell has publicly urged this administration not to roll these important safeguards back.

Given the damage that results from oil and gas emissions and the readily achievable, low-cost opportunities to reduce them, methane standards are both necessary and warranted. Curbing methane emissions from the oil and gas industry is a “win-win-win” that can reduce waste, curb greenhouse gas emissions, and improve air quality. We therefore strongly opposed the rollback of the new source performance standards for the oil and gas sector. This rollback is unwarranted,

¹ <https://www.edf.org/climate/methane-studies>

² http://www.catf.us/wp-content/uploads/2018/10/CATF_Pub_GaspingForBreath.pdf

and would be particularly harmful to people, especially children, who live near oil and gas development across the country.

Sincerely,

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