



ADDRESSING OIL AND GAS METHANE POLLUTION ON TRIBAL AND PUBLIC LANDS: THREATS AND OPPORTUNITIES

Methane, which has more than 80 times the climate-altering impact of carbon dioxide (CO₂) over a 20-year period, is the second most prevalent greenhouse gas. The oil and gas sector is the single largest source of methane emissions in the U.S.¹

The Administration has adopted a goal of cutting methane emissions from the oil and gas sector by 40 to 45 percent below 2012 levels by 2025. To achieve this goal, the Environmental Protection Agency (EPA) and the Department of the Interior's Bureau of Land Management (BLM) have produced common-sense rules that help meet this climate goal cost-effectively while also reducing the waste of valuable energy resources on federal and tribal lands. The rules will also curb pollution that harms communities near and downwind of oil and gas sites, wildlife, and outdoor enthusiasts. Further, capturing natural gas will generate more royalty revenues that can be used to better protect special places and support communities and infrastructure. However, BLM has not yet finalized its rule, and EPA's rule only covers pollution from new and modified sources—it does not cover methane pollution from existing oil and gas sources, leaving a substantial gap in regulating this dangerous climate pollutant. Therefore, it is critical that EPA set standards for current sources of pollution, and that BLM swiftly finalize its rule.

METHANE: QUICK FACTS

- Methane is a super-pollutant that fuels climate change, threatening human health², wildlife, and natural resources across the U.S.³
- In 2014, methane emissions comprised nearly 11 percent of total U.S. greenhouse gas emissions.⁴ Methane is the chief component of natural gas⁵, which can also be a by-product of oil production. The oil and gas sector is the largest source of these emissions, accounting for one-third of total methane pollution.⁶
- Methane emissions can occur at any stage of the oil and gas supply chain (i.e., drilling and production, processing, transmission, storage, and distribution to end users), but most emissions occur during oil and natural gas production.⁷
- Operators typically release natural gas directly into the atmosphere through venting (direct release) and/or flaring (burning). Methane is also wasted through leaks in oil and gas infrastructure.⁸
- In addition to methane, other harmful pollutants are emitted by the oil and gas sector, including volatile organic compounds (VOCs) and air toxics like benzene (a known carcinogen). These pollutants cause a range of harmful health effects such as asthma and some cancers, as well as environmental impacts. These pollutants can be

particularly concerning for communities on and near tribal and federal lands where oil and gas production occurs.⁹ *Regulations that reduce methane will also reduce emissions of these other damaging pollutants.*

BLM'S PROPOSED RULE

- The BLM proposed a rule in February 2016 to reduce methane pollution and waste from the oil and gas industry on public and Indian lands.¹⁰ More specifically, the proposed rule aims “to reduce the waste of natural gas from flaring, venting, and leaks from oil and gas production operations on public and Indian lands.”¹¹ The rule is currently in the final stages of review by the White House.
- BLM estimates that the rule’s net benefits could be worth about \$115-\$188 million each year.¹²
- The proposed rule also could save enough natural gas to be able to power up to about 760,000 households each year. Compared to 2013 levels, this proposed rule “would reduce flaring by an estimated 41-60 percent and venting by roughly 44-46 percent.”¹³
- Alternatively, American taxpayers could lose \$800 million over the next decade from natural gas flaring and venting on federal lands, if policies are not updated.¹⁴

EPA REGULATIONS

- In May 2016, the EPA finalized a rule to reduce methane and volatile organic compound (VOC) emissions from new and modified oil and gas sources, including regular methane leak inspection and repair requirements.¹⁵
- EPA estimates that this rule will result in net climate benefits of \$170 million in 2025, by reducing 462,000 metric tons of methane (an amount equivalent to 11 million metric tons of carbon dioxide). It also will reduce 210,000 tons of VOCs and 3,900 tons of air toxics by 2025.¹⁶
- One analysis estimates that without existing source standards, 75 percent of methane from today’s oil and gas infrastructure would remain unregulated at the federal level, even after the rule on new and modified sources goes into effect.¹⁷
- EPA has begun a data collection process to serve as the foundation for regulating existing oil and gas sources.

HUMAN HEALTH CONSEQUENCES

- Air pollution from oil and gas facilities can have a significant impact on public health—even in areas far from oil and gas production.
- 238 counties in 21 states face cancer risk that exceeds EPA’s one-in-a-million threshold level of concern due to emissions from oil and gas facilities—these counties have a population of over 9 million people;
- Oil and gas production creates air pollution which results in ozone, also known as smog. Ozone smog harms public health. Smog especially poses a threat to children who suffer from asthma.
 - Nationally, there are more than 750,000 summertime asthma attacks in children under the age of 18 due to ozone smog resulting from oil and gas pollution.
 - Each summer, there are more than 2,000 asthma related emergency room visits and over 600 respiratory related hospital admissions nationally due to ozone smog resulting from oil and gas pollution.
 - Children miss 500,000 days of school nationally each year due to ozone smog resulting from oil and gas pollution.

- Nationally, 12.4 million people live within one-half of a mile of oil and gas facilities, including nearly 156,000 Native Americans. Peer-reviewed science shows that living near oil and gas facilities is associated with negative health impacts, including fetal defects and respiratory ailments.

WILDLIFE IMPACTS

- Climate change is one of the greatest threats to wildlife because of its potential to alter ecosystems, food and water resources, and wildlife behavior.
- Climate change—partly fueled by methane pollution—is leading to rapid shifts in the habitat, landscapes, and seascapes American wildlife depend on, placing numerous species at risk of extinction within this century if current rates of emissions continue unabated.¹⁸
- Oil and gas wells and associated infrastructure on federal and tribal lands can fragment wildlife habitat for species like the pronghorn, compounding harm for wildlife already impacted by a rapidly-changing climate. This can hinder migration routes, limit access to food, water, and other resources, and ultimately can lead to species population declines.
- Wildlife also can be harmed as a result of spills, chronic leaks, and crude oil releases.
- Loss of wildlife affects hunters and anglers, as well as wildlife watchers, outdoor recreational businesses, and wildlife managers, all of whom have a vested interest in conservation.¹⁹



IMPACTS OF METHANE WASTE ON THE ECONOMY AND ON TRIBAL LANDS

- A recent study by ICF International found that “[o]il and gas operations on federal and tribal lands emitted over 1 million tons of methane in 2013, about 12 percent of the nation’s methane emissions from oil and gas operations.”²⁰ This same study “estimates that fugitive and vented losses from oil and natural gas operations on federal and tribal lands amounted to over 65 billion cubic feet (Bcf) in 2013. This gas would be worth nearly \$330 million at current prices.”²¹ Analysis by the Clean Air Task Force has shown that emissions on federal and tribal lands are disproportionately high—reported emissions from production basins dominated by these lands are much higher than expected, based on the portion of U.S. oil and gas produced on them.²² This analysis suggests that the ICF International analysis is conservative.
- As much as \$23 million in royalty revenues from oil and gas development on tribal lands are lost annually when natural gas is wasted.²³ These revenues, if recovered, could be used to construct schools, hospitals, and hotels, and could generate additional jobs and economic development to improve the well-being of local communities, as well as remediate environmental impacts.
- In 2011, total expenditures on wildlife watching, hunting, and fishing in the U.S. amounted to \$54.9 billion.²⁴ A rapidly-changing climate threatens this outdoor economy. Fees and taxes paid by hunters and anglers support non-game conservation programs run by state wildlife agencies, so a decline in outdoor recreation means a decrease in the funds for such programs.²⁵

POLICY RECOMMENDATIONS

- Finalize the proposed rule by the Bureau of Land Management to substantially curtail methane waste from both existing and new sources of gas and oil production on public and tribal lands.
- Propose, finalize, and implement strong Environmental Protection Agency standards limiting methane pollution from existing sources in the oil and gas industry.
- Successfully implement the recently finalized EPA rule limiting methane pollution from new and modified sources.

¹ EPA, Climate Change, Emissions, Overview of Greenhouse Gases, Methane Emissions. <https://www3.epa.gov/climatechange/ghgemissions/gases/ch4.html>. Emissions estimates are from the *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014*.

² U.S. National Climate Assessment (NCA), 2014, Highlights: Human Health. U.S. Global Change Research Program. <http://nca2014.globalchange.gov/highlights/report-findings/human-health#intro-section-2>

³ U.S. NCA 2014, Highlights: Ecosystems and Biodiversity, Plants and Animals. U.S. Global Change Research Program. <http://nca2014.globalchange.gov/highlights/report-findings/ecosystems-and-biodiversity#statement-16341>

⁴ EPA, Climate Change, Emissions, Overview of Greenhouse Gases. <https://www3.epa.gov/climatechange/ghgemissions/gases.html>. Emissions Estimates are from: *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014*.

⁵ EPA Methane Emissions.

⁶ Ibid.

⁷ ICF International, “Methane Emissions from the Oil and Gas Industry: ‘Making Sense of the Noise,’” 2015, page 4. <http://www.icfi.com/insights/white-papers/2015/methane-emissions-from-the-oil-and-gas-industry>

⁸ U.S. Government Accountability Office (GAO), Report to Congressional Requesters, *Oil and Gas, Interior Could Do More to Account for and Manage Natural Gas Emissions*, July 2016, page 6. <http://democrats-naturalresources.house.gov/imo/media/doc/Interior%20Could%20Do%20More%20to%20Account%20for%20and%20Manage%20Natural%20Gas%20Emissions.pdf>

⁹ EPA 2016. Proposed Climate, Air Quality and Permitting Rules for the Oil and Gas Industry: Fact Sheet. https://www.epa.gov/sites/production/files/2016-09/documents/og_fs_081815.pdf

¹⁰ U.S. Bureau of Land Management (BLM), Energy, Oil and Gas, “Proposed Methane and Waste Prevention Rule.” http://www.blm.gov/wo/st/en/prog/energy/oil_and_gas/methane_and_waste.html

¹¹ BLM Fact Sheet.

¹² Ibid.

¹³ Ibid.

¹⁴ Western Values Project. Up in Flames: Taxpayers Left Out in the Cold as Publicly Owned Natural Gas is Carelessly Wasted. May 2014. <http://westernvaluesproject.org/wp-content/uploads/2014/05/Up-In-Flames.pdf>

¹⁵ EPA, “EPA’s Actions to Reduce Methane Emissions from the Oil and Natural Gas Industry: Final Rules and Draft Information Collection Request,” pages 1-2. <https://www3.epa.gov/airquality/oilandgas/may2016/nsps-overview-fs.pdf>

¹⁶ EPA’s Actions to Reduce Methane Emissions, page 4.

¹⁷ Cassidy, A., *The Who’s Who of Methane Pollution in the Onshore Oil and Gas Production Sector*, Center for American Progress, June 20, 2016, page 4. <https://cdn.americanprogress.org/wp-content/uploads/2016/06/20070044/MethanePollution-report.pdf>

¹⁸ U.S. NCA 2014, Ecosystems and Biodiversity.

¹⁹ NWF 2015. Game Changers: Climate Impacts to America’s Hunting, Fishing, and Wildlife heritage. <http://www.nwf.org/News-and-Magazines/Media-Center/Reports/Archive/2015/11-16-2015-Game-Changers.aspx>

²⁰ Environmental Defense Fund (EDF), “New Study Quantifies Natural Gas Loss from Production on U.S. Public and Tribal Lands,” June 23, 2015. <https://www.edf.org/media/new-study-quantifies-natural-gas-loss-production-us-public-and-tribal-lands>

²¹ EDF, “Substantial Loss Of Natural Gas On Public Lands, Report: Cutting Energy Waste On Us Federal, Tribal Lands Could Save Millions.” <https://www.edf.org/energy/substantial-loss-natural-gas-public-lands>

²² Clean Air Task Force, “Supplemental Comments to May 30, 2014 Comments Submitted to Inform Modernization of the U.S. Bureau of Land Management’s 34-Year-Old Rules.” http://www.catf.us/resources/filings/BLM_Oil_and_Gas_Regulations/20150626-CATF%20Supplement%20to%20May%2030%20BLM%20Comments.pdf

²³ BLM, “Fact Sheet on Methane and Waste Reduction Rule.”

http://www.blm.gov/style/medialib/blm/wo/Communications_Directorate/public_affairs/news_release_attachments.Par.74451.File.dat/VF_Fact_Sheet.pdf

²⁴ U.S. Fish and Wildlife Service (USFWS) 2012. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. <http://www.census.gov/prod/2012pubs/fhw11-nat.pdf>

²⁵ Voggesser, Garrit, “Big Impacts on Big Game, Voices from the Field: Sportsmen Speak Out,” NWF Blog, November 17, 2015. <http://blog.nwf.org/2015/11/big-impacts-on-big-game/>