

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 communities unprotected while delaying modest compliance expenditures by the oil and gas companies that own and operate new and modified wells—expenditures that represent a tiny fraction of these companies’ tens of billions of dollars in annual revenues.

These measures are highly cost-effective, even without accounting for the climate and health benefits of preventing leaks. In public testimony on EPA’s proposed rule, a leak detection and repair company indicated that it provides surveys for \$250 per well, and other sources have documented similarly modest costs. Moreover, compliance with the leak detection and repair provisions will prioritize taxpayers’ interests by ensuring resources that would otherwise be leaked to the atmosphere are instead captured and put to use. And greater adoption of methane mitigation practices will help to put Americans to work in the methane mitigation industry, which represents over 130 U.S. companies with locations in almost every state, helping to recover otherwise wasted natural gas. The stay will harm companies that provide methane mitigation technologies and services – 60% of which are small businesses.

EPA’s methane standards are national protections that will ensure *all* communities benefit from these common sense best practices—and not just those located in states that have adopted such regulations. These proven state-level standards—including requirements in Colorado, Ohio, and Wyoming—demonstrate that protective pollution measures are entirely consistent with continued development and economic growth. The purpose of national standards under section 111 of the Clean Air Act is to ensure that all Americans are protected from sources of harmful pollution. The stay, however, will leave millions of Americans at risk.

A broad and diverse set of stakeholders supports the current oil and gas standards, including lawmakers in major producing states, small businesses, manufacturing workers’ groups, investors, health professionals, public health groups, labor unions, and environmental organizations. Polling during the rule’s comment period showed that 67 percent of Americans supported the proposed safeguards.

We strongly urge you to adhere to the rule’s deadlines and not attempt to stay the leak detection and repair provisions.

You can contact Peter Zalzal at pzalzal@edf.org or 303-447-7214 to further discuss this request.

Respectfully submitted,

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Laura Belleville
Appalachian Trail Conservancy

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