



U.S. PIRG

Standing Up To
Powerful Interests



ENVIRONMENTAL
ACTION SINCE 1970

RE: Docket ID No. EPA-HQ-OAR-2021-0317-0001 Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Mail Code 1101A

Dear Administrator Regan,

We write to you on behalf of Environment America, U.S. PIRG, and Environmental Action. Thank you for proposing strong methane emissions rules. Methane is a particularly harmful greenhouse gas and 85 times more potent than carbon dioxide over a span of 20 years. Currently, the EPA has the opportunity to drastically reduce our country's greenhouse gas emissions by strengthening methane emissions regulations. While the proposed regulatory plan takes good first steps, it must go further to deliver on the Global Methane Pledge and President Joe Biden's goal of a 30 percent reduction in methane emissions by 2030.

We can no longer afford to give methane polluters a free pass to damage our environment and our health. Holding oil and gas companies accountable for the methane they leak into our atmosphere would be a huge victory for our country and our planet.

First, we urge the EPA to strengthen the monitoring requirement. EPA must require regular monitoring at smaller, high polluting wells. Hundreds of thousands of wells across the country generate just a trickle of usable product but are leaking large amounts of unused methane into the atmosphere. EPA has recognized in the proposal that a "low production" exemption is not appropriate. However, under EPA's current proposal, operators that calculate lower potential

emissions (less than three tons of methane per year) could still evade regular leak monitoring. This would allow operators to let super-emitters continue to leak an amount of methane disproportionate to their size without consequence.

Second, the monitoring schedule for sites emitting less than three tons of methane per year must be more frequent and regular. As it stands, the EPA requires these sites to be checked for leaks only once. These sites should be checked for leaks quarterly as it is possible for increases in emissions to go unnoticed without consistent monitoring.

Finally, while the occasional flaring is an inevitable byproduct of methane gas and oil extraction, it is another wasteful practice that is rampant in the oil and gas production sector and it is happening far too frequently. When companies rush to extract oil, some forgo investments necessary to capture and sell gas and instead burn it as a waste product, emitting a host of climate and health-harming pollutants. Flares also commonly malfunction and spew methane directly into the atmosphere. Leading operators have virtually eliminated flaring across their operations and states like Colorado and New Mexico have moved to eliminate flaring except in emergency situations. EPA should likewise move to end routine flaring.

Attached to this letter are 32,046 comments submitted by members of Environment America, U.S. PIRG and Environmental Action calling on the EPA to enforce the strictest possible methane emissions regulations. We ask that these names be entered into the official record and considered as separate public comments.

Given the above, we urge the EPA to set the strongest methane standards possible.

Sincerely,
Max Wengroff, Environment America
Matt Casale, U.S. PIRG
Patrick Kelly-Fischer, Environmental Action