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Jan. 31, 2022

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

RE: Docket ID No. EPA-HQ-OAR-2021-0317

Dear Administrator Regan,

In the U.S. oil and gas production is the largest industrial source of methane pollution. This pollution is accelerating the pace of climate change and harming the health of our families and communities — and it's only getting worse.

This issue hits close to home. The University of Texas is the fifth-largest oil producer in the state, with 10,000 oil wells in West Texas on land owned by the University. Unfortunately, these wells have been shown to consistently release harmful methane into the atmosphere with little regulation - in 2017, these wells flared as much as 5.2 billion cubic feet of natural gas. Despite University of Texas researchers publishing a number of studies on the dangers of flaring, and UT representatives speaking out against methane flaring, University Lands has failed to implement any substantial solutions. We now call upon the EPA to make certain that its potential new guidelines protect people and the planet from these toxic releases.

While EPA's proposed methane safeguards are an important step in the right direction, they do not go far enough, and must be strengthened in order to protect communities on the frontlines of oil and gas development, and confront the climate crisis head-on. The EPA must strengthen their proposed rule to protect public health and the climate, through a supplemental rulemaking or other action, in order to:

1. End the wasteful and dangerous practice of routine flaring at oil and gas facilities, as states like Colorado and New Mexico have done already.
2. Require regular monitoring at all smaller, high-polluting and leak-prone wells, and
3. Work to incorporate emission monitoring results generated by community groups and other third parties into its standards.

We cannot miss out on this opportunity to cut methane pollution, safeguard public health, and act on climate. That means strengthening your proposed rules to finalize the most comprehensive methane safeguards that finally reign in methane waste from oil and gas companies and hold polluters accountable.

Thank you for your consideration,

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