

To: U.S. Environmental Protection Agency

From: Environmental Defense Fund; Breathe Utah; Change the Chamber; Citizens Caring for the Future; Clean Air Council; Clean Air Task Force; Center for Biological Diversity; Christians For The Mountains; Center for Methane Emissions Solutions; Defend Our Future; Environmental Law & Policy Center; Environment Texas; Evangelical Environmental Network; Earthjustice; Environmental Health Project; Healthy Air & Water CO; Hispanic Access Foundation; League of Conservation Voters; Moms Clean Air Force; Naeva; Natural Resources Defense Council; New Mexico & El Paso Interfaith Power and Light; New Mexico Voices for Children; Our Future West Virginia; PA- Jewish Earth Alliance; Pennsylvania Environmental Council; Public Land Solutions; PennEnvironment; Responsible Decarbonization Alliance – RDA; Rio Grande International Study Center; Runners for Public Lands; ReImagine Appalachia; Sierra Club; Texas Impact; Western Environmental Law Center; Waterkeeper Alliance; Western Leaders Network

RE: Comments on Financial and Technical Assistance Funding under the Methane Emissions Reduction Program

Submitted: June 2, 2023

I. Introduction

The Environmental Protection Agency (EPA) is soliciting feedback on providing financial and technical assistance authorized under the Methane Emissions Reduction Program (MERP).

Specifically, EPA is interested in responses to the following questions:

1. Which listed actions in the Methane Emissions Reduction Program should be prioritized for financial and technical assistance?
2. What methane mitigation technologies and practices should EPA prioritize for financial assistance to achieve near-term emission reductions?
3. What methane monitoring technologies and research should EPA prioritize for financial assistance to meet near-term monitoring needs?
4. Are there areas of financial and technical assistance for methane mitigation from marginal conventional wells that should be prioritized?
5. Are there emerging monitoring and mitigation technologies that should be prioritized for financial assistance to support innovation and encourage methane emissions reduction efforts?
6. What kinds of technical assistance would be most valuable?
7. How can financial assistance be used to mitigate the health effects of methane and other greenhouse gas emissions in low-income and disadvantaged communities?

The undersigned organizations share an interest in addressing the climate crisis through reductions in greenhouse gas emissions from the oil and gas sector, ensuring benefits for disproportionately impacted communities, and seeing that MERP's funding be maximized to

achieve these ends. Some of the undersigned organizations also submitted comments to EPA's Request for Information (RFI) on related topics. We submit responses to several of EPA's questions below, though would like to underscore the importance of EPA engaging directly with frontline communities and reviewing community comments on the MERP RFI¹ and at the May listening sessions to ensure adequate consideration of community interests.

II. Question 1: Which listed actions in the Methane Emissions Reduction Program should be prioritized for financial and technical assistance?

With the passage of MERP and the \$1.55 billion appropriation from Congress, EPA has an important opportunity to fund programs that will significantly reduce emissions while protecting communities. To that end and with respect to the \$850 million reserved for all types of wells,² we recommend that EPA prioritize the following: (1) improving EPA, state, and tribal methane emissions monitoring for detection of leaks and compliance assurance; (2) improving Greenhouse Gas Reporting Program (GHGRP) reporting and the implementation of incentives to reduce emissions; (3) supporting programs that will protect and engage communities; and (4) permanently mitigating emissions at marginal wells. Generally, EPA should not prioritize financial assistance to operators. If it does, EPA should create guardrails as outlined in section I(E).

A. Enhanced EPA Monitoring and Financial and Technical Assistance for State and Tribal Monitoring

First, we encourage EPA to use MERP funds to enhance state, tribal, and EPA monitoring efforts, including those that can help ensure clean air standards are delivering expected pollution reductions.

EPA expects its section 111 proposal to reduce methane emissions by 36,000,000 tons; VOC emissions by 9,700,000 tons; and HAP emissions by 390,000 tons.³ To achieve these reductions, operators must comply with the standards and high emissions events must be quickly detected and mitigated. Unfortunately, data shows that compliance with environmental regulations is generally quite low. For most environmental regulations – including those applicable to the oil and gas sector – the rate of serious noncompliance is 25% or more, and for many rules with big health consequences the serious noncompliance rates for large facilities are 50% to 70%.⁴ While protective regulations are an important first step, regulators must improve compliance assurance to achieve expected emissions reductions.

¹ Docket I.D. EPA-HQ-OAR-2022-0875.

² We address priority uses for the \$700 million allocated for marginal conventional wells in section IV.

³ EPA, Regulatory Impact Analysis of the Supplemental Proposal for the Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review, 49 (Nov. 2022).

⁴ Cynthia Giles, *Next Generation Compliance: Environmental Regulation for the Modern Era* (2022), available at <http://fdslive.oup.com/www.oup.com/academic/pdf/openaccess/9780197656747.pdf#page12>.

EPA's top priority should thus be to enhance monitoring and compliance assurance efforts. Specifically, EPA should consider using MERP funds to conduct regular overflights and other monitoring in major production basins, take follow up and enforcement action based on the results, and ensure there is adequate personnel for these efforts. EPA should also consider coordinating with the Department of Energy on their work to find undocumented orphaned wells and measure emissions from these wells.⁵ Enhanced monitoring can improve data quality, increase transparency and accountability, and help to ensure EPA's proposed section 111 regulations for this sector are adhered to and deliver on their promised pollution reductions. Data from monitoring can also be incorporated into GHGRP updates, as discussed in more detail below.

EPA should consider creating a monitoring program that is responsive to the concerns of low-income and disadvantaged communities, including by working with communities and third-party monitors to identify and prioritize enforcement in communities near significant oil and gas development. This could be done in many forms, including holding listening sessions with communities and third-party monitors and creating a forum for parties to discuss actionable data with EPA.

Financial and technical assistance should likewise be allocated to help support state and tribal implementation, monitoring, and compliance assurance for methane standards. Many state and tribal agencies are understaffed and under-resourced, limiting their ability to ensure compliance. MERP funding can be used to help states and tribes hire additional inspectors and other staff to conduct monitoring and identify potential regulatory violations, thereby ensuring that emission reductions are actually achieved in these areas.

EPA should also consider supporting state efforts to monitor, measure, analyze, and verify emissions for regulatory mitigation programs, such as the verification program that the State of Colorado is currently designing under the State's Air Quality Control Commission Regulation Number 7.

B. Reporting Updates and the Waste Emissions Charge

Second, EPA should ensure sufficient funding is available to improve reporting accuracy under subpart W and to implement the waste emissions charge.

1. Reporting Updates

In adopting MERP, Congress recognized the importance of accurate and empirically based methane reporting in effectuating the waste emissions charge. That is because the waste charge is

⁵ U.S. Department of Energy Office of Fossil Energy and Carbon Management, Undocumented Orphaned Wells Research Program Division of Methane Mitigation Technologies, <https://www.energy.gov/fecm/undocumented-orphaned-wells-research-program-division-methane-mitigation-technologies>.

only assessed on methane emissions reported to EPA through the GHGRP. If that reporting is not accurate and does not capture all of the emissions actually occurring, then the waste charge will not be as effective in incentivizing reductions as Congress intended. In recognition of the well-documented underreporting that currently occurs,⁶ Congress required EPA to update methane reporting methods and provided direction and substantial resources for doing so. Funding is provided for EPA to “prepare inventories, gather empirical data, and track emissions,” as well as for assisting operators in meeting their reporting obligations.⁷

To fulfill Congress’s directive to ensure methane reporting is empirically based and accurately reflects total emissions from facilities, EPA should ensure the necessary funds are directed to gathering empirical emissions data, revising reporting methods, and providing reporters with technical assistance. Funds should be used to gather empirical data through measurement studies and overflights, especially in regions where available data may be lacking. This data can also be useful to support mitigation efforts. EPA should also develop clear protocols that would allow reporters to directly measure site level emissions. EPA should provide technical assistance to operators seeking to measure their emissions in the form of training, manuals, and other resources.

Auditing and verifying reported emissions will also be important for ensuring accuracy and effectuating the waste charge. EPA should likewise consider using funds for this purpose, including by regularly comparing reported emissions to observational data. With this funding and support from Congress, EPA has an opportunity to enhance the accuracy, reliability, and empirical grounding of methane reporting methods that will help implement the waste emissions charge and can also help to support other important EPA policies to reduce oil and gas sector pollution.

2. Waste Emissions Charge Implementation

EPA should also ensure sufficient funds are available and used for implementing, assessing, and enforcing the waste emissions charge. Congress specified that the appropriations should be used to “cover all direct and indirect costs required to” administer the charge.⁸ To timely and fully implement the waste charge and accurately assess the charge on applicable facilities will require significant agency resources and attention. EPA will need to, as discussed above, ensure that all applicable facilities required to report are doing so completely and accurately. EPA will then need to calculate methane intensity, determine whether exemptions are available, and collect the charge. Each of these steps will require adequate staff attention as well as technical assistance and outreach to operators of applicable facilities.

⁶ Alvarez et al., *Assessment of Methane Emissions from the U.S. Oil and Gas Supply Chain*, 361 *Science* 186 (2018), <https://www.science.org/doi/10.1126/science.aar7204>; Rutherford et al., *Closing the Methane Gap in US Oil and Natural Gas Production Emissions Inventories*, 12 *Nature Comms.* 4715 (2021), <https://www.nature.com/articles/s41467-021-25017-4>.

⁷ 42 U.S.C. § 7436(a)(1), (4).

⁸ *Id.* at § 7436(a)(4).

C. Community Engagement Programs

Third, EPA should prioritize funding for low-income and disadvantaged community programs that reflect community interests. For instance, EPA could consider creating grant programs that enable communities to monitor for methane emissions and legacy air pollution coming from oil and gas operations in a manner that ensures data produced is actionable. Congress has long empowered EPA to create grant programs for third-party monitoring, including in the American Rescue Plan, and EPA has created programs like the Community-Scale Air Toxics Ambient Monitoring grants, the Air Sensor Toolbox, and the Community and Citizen Science Air Projects.

EPA should also work with information gathered from section 111 reporting and monitoring to build transparency around ongoing oil and gas emissions in nearby communities and to notify communities when large or ongoing emissions events are likely occurring. The section 111 regulations require that operators report on compliance with the regulations and whether they are seeking an exemption. This information and data collected from EPA and third-party monitoring can be used to notify communities of when ongoing or large emissions events pose a risk to their health.

EPA should ensure that program design and any funding it deploys are done in consultation with impacted communities.

D. Plugging Marginal Wells

Section 136(a)(3)(D) gives EPA authority to provide funding for “permanently shutting in and plugging wells on non-Federal land.” EPA should use part of the \$850 million allocated for all types of wells to assist in plugging marginal wells and to provide states, tribes, local governments and communities funds to permanently shut in and plug marginal wells on non-Federal land. More detail on how EPA should finance marginal well plugging is provided in section IV.

E. Operator Assistance

To the extent EPA provides any funding for private companies or organizations, it should be a lower priority and should be limited to technical assistance. When EPA provides operators financial assistance, it should be provided only to small operators, be designed in a way that incentivizes compliance with regulations, and in most cases be provided as a loan.⁹

First, EPA should prioritize other programs ahead of operator assistance. Owners and operators already have a duty to comply with regulations adopted under section 111 of the Clean Air Act and other authorities that require them to reduce emissions. Many have also developed voluntary emission reduction targets as part of their business models and have the ability to implement

⁹ Grants for small operators may be appropriate in some circumstances (see section IV on marginal well plugging).

cost-effective measures identified by EPA's rules. Further, the cost of other important programs – including compliance assurance, GHGRP updates, WEC implementation, and plugging – are likely to be very high. For example, plugging and reclaiming a single well costs on average approximately \$76,000,¹⁰ making the cost of plugging marginal well sites operated by just small operators approximately \$1.75 billion.¹¹ Because of the high cost of these other competing programs and the ability and obligation operators have to reduce emissions on their own, operator assistance should be a lower priority for EPA.

Moreover, section 136(a)(1) of MERP authorizing financial and technical assistance to owners and operators is limited to preparing and submitting reports under subpart W of the Greenhouse Gas Reporting Program. Thus, should EPA provide assistance to private companies and organizations for any of the other purposes specified in MERP, such as developing and utilizing new or advanced emission detection and reduction technologies, EPA should focus on providing technical, rather than financial, assistance.

If EPA provides financial assistance, the agency should focus on smaller operators and set parameters that incentivize strong operator action and the greatest emissions reductions possible. For instance, EPA could require fleet plugging plans (i.e., for an operator's entire corpus of wells) before providing funding to operators or require operators to show funding will be used to achieve reductions that will exceed those gained under section 111 standards and then document that those reductions were achieved. EPA should also consider conditioning funding to operators on a demonstration that they follow all state, local, and federal clean air and water laws and regulations.

Finally, if EPA provides financial assistance to private companies and industry, EPA should provide it in the form of loans, rather than grants.¹² Oil and gas companies generate significant revenue and can potentially generate additional profit by acquiring new and advanced technologies to capture and sell gas that would otherwise be vented or flared.¹³ As a result, MERP funding could create a windfall profit scenario for companies at the expense of the government and community groups that might have been able to obtain additional funding. Accordingly, to the extent EPA provides any funding for private companies, the agency should consider how it might use loans to best leverage the limited resources provided by MERP.

¹⁰ This is the average cost of plugging an orphaned well. Resources for the Future, *Decommissioning Orphaned and Abandoned Oil and Gas Wells: New Estimates and Cost Drivers* (July 2021), <https://www.rff.org/publications/journal-articles/decommissioning-orphaned-and-abandoned-oil-and-gas-wells-new-estimates-and-cost-drivers/>. Plugging marginal wells is thought to cost slightly less, but even it cost much less the discrepancy between available funds and the funds required to plug small marginal wells would remain significant.

¹¹ See *infra* footnote 20.

¹² With the exception of funding to permanently mitigate emissions at marginal well sites operated by those in genuine need of financial assistance (see section IV).

¹³ See, e.g., Rystad Energy, *Final Report: Cost of Flaring Abatement* 11 (Jan. 31, 2022), https://blogs.edf.org/energyexchange/files/2022/02/Attachment-W-Rystad-Energy-Report_-Cost-of-Flaring-Abatement.pdf (finding that gas gathering, on average, has a net profit of \$3.10/kcf or \$162 per metric ton of methane flaring avoided).

III. Question 3 and 5 - What methane monitoring technologies and research should EPA prioritize for financial assistance to meet near-term monitoring needs? Are there emerging monitoring and mitigation technologies that should be prioritized for financial assistance to support innovation and encourage methane emissions reduction efforts?

EPA should consider financing research and development of additional capture solutions to prevent routine flaring. While there are a wide range of cost-effective solutions that already exist, additional technologies are emerging that could benefit from research and development financing.

IV. Question 4 - Are there areas of financial and technical assistance for methane mitigation from marginal conventional wells that should be prioritized?

EPA should distribute part of the \$850 million allocated for all types of wells, and the \$700 million allocated for marginal conventional wells, to permanently mitigate emissions at marginal conventional wells and to assist states and tribes in doing so. We encourage EPA to do so in a manner consistent with the following considerations to ensure funds are utilized in ways that maximize the emission reductions and environmental justice benefits to be gained by MERP.

- A. EPA should prioritize funds for operators opting to permanently eliminate emissions at marginal conventional wells with a matching grant program

EPA should prioritize a portion of the \$850 million allocated for all types of wells, in addition to the \$700 million allocated for marginal conventional wells, for operators who opt to permanently eliminate emissions at marginal wells. Specifically, EPA should create a matching grants program for marginal well operators that apply to plug with tiers based on need. For example, domestic well owners who do not operate commercially are less likely to have the funds to plug and may benefit from full EPA financing, while other operators – even small operators that EPA should prioritize (see section IV(c)) – may be able to cover 50% of the cost. EPA could thus further tier based on an operator’s well count or revenue as identified in their application. A grant program of this type would both help to identify operators who want to plug their wells and increase the number of marginal wells that can be plugged.

EPA should prioritize permanent and full (rather than temporary and partial) mitigation at marginal wells for several reasons. First, marginal wells contribute heavily to methane emissions through leakage, making up about 50% of total production site methane emissions, so fully mitigating emissions at these sites is critical.¹⁴ Second, marginal conventional wells produce very little marketable oil and gas, constituting just 6% of national production.¹⁵ Because of these wells' limited economic viability and their marginal production, many will likely need to be

¹⁴ Mark Omara, et al., *Methane emissions from US low production oil and natural gas well sites*, 13 *Nature Commc'n* 2085 (2022) at 6, <https://www.nature.com/articles/s41467-022-29709-3> (“Omara”).

¹⁵ *Id.*

plugged in the coming years. However, because plugging wells can be a relatively costly endeavor, owners of marginal conventional wells will often put off plugging wells for decades with many becoming insolvent prior to plugging.¹⁶ As a result, government assistance would be particularly helpful for these sites. Third, if operators are provided funding to simply reduce or partially mitigate emissions, this will serve to extend the life of wells that have little chance at surviving – MERP’s funding would best be used to instead fully mitigate emissions at sites that soon may become orphaned anyway.

EPA should also prioritize a program that permanently mitigates emissions at active or idle marginal wells instead of a plugging program focused solely on orphaned wells. Active marginal wells are a relatively larger source of emissions than orphaned wells.¹⁷ Further, there is funding dedicated under the Bipartisan Infrastructure Law to an orphaned well closure program operated by the Department of Interior (DOI), but there is not currently a federal program that focuses on plugging active or idle marginal wells at high risk of being orphaned. While plugging orphaned wells is an extremely important endeavor that we support, we see great benefit and efficiencies in using MERP funding to focus on active and idle marginal well closure: EPA would be starting a mitigation program not currently covered by another agency, maximize emissions reductions, and reduce logistical issues that would come with coordinating orphaned well plugging with DOI. Moreover, many marginal wells that are currently active or idle are likely to become orphaned in the future – based on estimates of the total number of wells drilled in the U.S., the number of active wells and the number of plugged wells, Environmental Defense Fund estimates that approximately 50% of inactive wells in the U.S. have been orphaned, and the vast majority of idle wells (wells that have an owner but do not produce anything) do not get turned back on.¹⁸ A program focused on permanently mitigating emissions at active and idle marginal wells thus would serve to help prevent the orphaned well epidemic.

B. Mitigation efforts should prioritize leak prevention assessments

While we recommend that EPA provide financial assistance to marginal well operators that opt to plug their wells, should EPA choose to provide assistance beyond that (i.e., to *reduce* emissions at marginal wells), EPA should prioritize funding opportunities that focus on leak prevention assessments and accurate empirical emissions measurement. Conducting leak prevention assessments can allow operators to optimize their leak detection and repair (LDAR) programs beyond what is required through current EPA regulations by identifying and remedying system weaknesses that might not otherwise be detected. Providing funding for empirical emission measurement will not only ensure that operators’ reported emissions are

¹⁶ Zachary R. Mider and Rachel Adams-Heard, *An Empire of Dying Wells*, Bloomberg (Oct. 12, 2021), <https://www.bloomberg.com/features/diversified-energy-natural-gas-wells-methane-leaks-2021/>.

¹⁷ While marginal wells make up 50% of all well site production emissions, orphaned wells make up 3% of total methane emissions from abandoned wells. See Omara et al., *Nature Communications*, 2022; Boutot et al., *Environ. Sci. Technol.* 2022, 56, 20, 14228–14236.

¹⁸ See, e.g., https://www.epa.gov/sites/default/files/2018-04/documents/ghgemissions_abandoned_wells.pdf, and Muehlenbachs, L. (2015), A DYNAMIC MODEL OF CLEANUP: ESTIMATING SUNK COSTS IN OIL AND GAS PRODUCTION. *International Economic Review*, 56: 155-185, <https://doi.org/10.1111/iere.12098>.

accurate but will also ensure that the data and feedback from such efforts will aid EPA in revising the GHGRP to require empirical data as mandated by the IRA.

C. Funds for marginal well plugging or mitigation efforts should be reserved for small owners/operators

EPA should ensure that marginal well funding – whether for plugging wells or reducing emissions – only goes to small owners and operators that genuinely need assistance. Marginal wells are not necessarily operated by small operators. In fact, only 4% of marginal well sites are operated by companies with fewer than 10 operating sites, and over half of all marginal wells are owned by very large companies (owning over 100 operating sites).¹⁹ Further, the cost to plug marginal wells owned by small operators with 10 or fewer well sites amounts to \$1.75 billion,²⁰ more than two times the allocated \$700 million for marginal wells under MERP. And the estimated \$1.75 billion cost for plugging these sites owned by small operators is likely a conservative estimate.²¹ Given this cost, and that most marginal conventional wells are owned by companies that generate hundreds of millions in revenue each year²² and are equipped with the necessary resources to mitigate emissions, EPA should ensure funding only goes to small owners and operators that genuinely require assistance.

EPA could also prioritize domestic-use wells on properties with owners that would not be able to otherwise afford plugging themselves, as these wells are very likely to become orphaned.

D. EPA should prioritize low-income and disadvantaged communities impacted by oil and gas development

Finally, EPA should provide funding to permanently mitigate emissions at marginal wells in low-income and disadvantaged communities that are disproportionately burdened by oil and gas development.

V. Question 6 - What kinds of technical assistance would be most valuable?

Section 136(a)(1) authorizes EPA to use appropriated funds to provide “technical assistance to owners and operators of applicable facilities to prepare and submit greenhouse gas reports under

¹⁹ *By the Numbers: Marginal Oil and Gas Wells*, Env’t Defense Fund, <https://blogs.edf.org/energyexchange/files/2021/11/MarginalWellFactsheet2021v2.pdf> (last visited Jan. 18, 2023); See also Attachment A, May 2023 EDF Operatorship Analysis.

²⁰ See Attachment A, showing that there are about 23,000 well sites operated by operators with 10 well sites or fewer. 23,000 multiplied by \$76,000 (the average cost to plug a single well, *see supra* footnote 10), is \$1.75 billion.

²¹ EDF’s analysis is restricted to wells that produced at some point in 2019, so there are hundreds of thousands of additional inactive wells in the United States outside the scope of this analysis that could be considered marginal. Further, each well site can have more than a single well that needs to be plugged, and this analysis multiplies the well plugging cost by the number of wells sites, not wells.

²² Env’t Defense Fund, et al., Comment Letter on Proposed Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review 103 (Jan. 31, 2022).

subpart W[.]” We urge EPA to provide technical assistance to subpart W reporters in the form of training, guidance, and best practices with the goal of ensuring reporting is done in an accurate and rigorous way. As described above, accurate reporting under subpart W is critical for ensuring the effectiveness of the waste emissions charge and fulfilling the intent and goals of MERP. Recently, major discrepancies in subpart W reporting have been uncovered,²³ and, absent technical assistance, such problems may become even more prevalent in light of the updated reporting requirements that EPA is directed to adopt. As incentives to under-report increase with changes to the reporting structure, it will be increasingly important for EPA to provide clear instructions and guidance for accurate reporting. Doing so will also help EPA take appropriate action when misreporting occurs and minimizes the potential for credible confusion on the part of operators.

VI. Question 7 - How can financial assistance be used to mitigate the health effects of methane and other greenhouse gas emissions in low-income and disadvantaged communities?

As discussed above, EPA can mitigate the health effects of methane and legacy air pollution in low-income and disadvantaged communities by:

1. Prioritizing EPA monitoring and enforcement in low-income and disadvantaged communities near oil and gas development and supporting state and tribal implementation, monitoring and enforcement;
2. Engaging with low-income and disadvantaged communities and third-party monitoring companies to identify areas of concern and follow-up with emissions mitigation efforts;
3. Transparently making information about section 111 compliance and exemptions from compliance, as well as data gathered from monitoring efforts, easily accessible and digestible on a public website, with community alerts when there are ongoing or large emissions events;
4. Prioritizing funding to permanently mitigate marginal conventional well emissions for wells that are near low-income and disadvantaged communities that have been disproportionately burdened by oil and gas development; and
5. Providing state, tribal, and local governments funds to plug marginal conventional wells.

VII. Conclusion

We appreciate the opportunity to provide input to the EPA on the Methane Emissions Reduction Program and look forward to working with the Agency to ensure that this important program is effectively implemented.

²³ See, e.g., Zachary Minder, *Methane ‘Loophole’ Shows Risk of Gaming New US Climate Bill*, Bloomberg (Aug. 10, 2022), <https://www.bloomberg.com/news/articles/2022-08-10/methane-loophole-shows-risk-of-gaming-new-usclimate-bill> (discussing reporters misinterpreting “in service” when reporting under subpart W to under-report pneumatic controller emissions).

Respectfully submitted,

Grace Smith, Attorney
Rosalie Winn, Senior Attorney
Environmental Defense Fund

Ashley Miller
Executive Director
Breathe Utah

Evey Mengelkoch
Climate Fellow
Change the Chamber

Kayley Shoup
Community Organizer
Citizens Caring for the Future

Joseph Otis Minott, Esq.
Executive Director and Chief Counsel
Clean Air Council

Darin Schroeder
Legal and Regulatory Director, Methane
Pollution Prevention
Clean Air Task Force

Maggie Coulter
Senior Attorney, Climate Law Institute
Center for Biological Diversity

Allen Johnson
Coordinator
Christians For The Mountains

Isaac Brown
Executive Director
Center for Methane Emissions Solutions

Morgan Brown
Organizer
Defend Our Future

Alison L. Steele
Executive Director
Environmental Health Project

Scott Strand
Senior Attorney
Environmental Law & Policy Center

Luke Metzger
Executive Director
Environment Texas

Mitchell Hescox
President/C.E.O.
Evangelical Environmental Network

Chris Espinosa
Legislative Director, Climate & Energy
Earthjustice

Sabrina Pacha
Senior Director
Healthy Air & Water CO

Shanna Edberg
Director of Conservation Programs
Hispanic Access Foundation

Lizzy Duncan
Government Affairs Rep., Healthy Communities
League of Conservation Voters

Celerah Hewes
National Field Manager
Moms Clean Air Force

Ahtza D Chavez
Executive Director
Naeva

David Doniger
Senior Strategic Director, Climate and Clean
Energy Program
Natural Resources Defense Council

Joan Brown
Executive Director
**New Mexico & El Paso Interfaith Power and
Light**

Amber Wallin
Executive Director
New Mexico Voices for Children

Kathy Ferguson
Int. Executive Director
Our Future West Virginia

Phyllis Blumberg
Lead Organizer
PA- Jewish Earth Alliance

John Walliser
Senior Vice President, Legal & Government
Affairs
Pennsylvania Environmental Council

Jason Keith
Managing Director
Public Land Solutions

Flora Cardoni
Field Director
PennEnvironment

Barbara Jarmoska
Director
Responsible Decarbonization Alliance – RDA

Sheila Serna
Climate Science and Policy Director
Rio Grande International Study Center

Kathleen Baker
Managing Director
Runners for Public Lands

Amanda Woodrum, Co-Director
Dana Kuhnline, Project Manager
ReImagine Appalachia

Mahyar Sorour
Director, Beyond Fossil Fuels Policy
Sierra Club

Bee Moorhead
Executive Director
Texas Impact

Melissa Hornbein
Senior Attorney
Western Environmental Law Center

Daniel E. Estrin
General Counsel and Advocacy Director
Waterkeeper Alliance

Gwen Lachelt
Executive Director
Western Leaders Network