

February 13th, 2023
EPA-HQ-OAR-2021-0317
Administrator Michael Regan
Environmental Protection Agency
Office of the Administrator
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Dear Administrator Regan:

As organizations that care about public health as well as the fate of our planet's climate, we greatly appreciate the Environmental Protection Agency's (EPA's) commitment to address methane emissions from new and existing oil and gas pollution under the Clean Air Act. We write to support key improvements and additional strengthening of the Supplemental Proposal to Reduce Methane and Other Harmful Pollution from Oil and Natural Gas Operations, to reduce methane air pollution from new and existing sources of oil and gas development as much and as quickly as possible.

While the best and most just solution to the climate crisis is to transition away from fossil fuels and embrace a clean energy economy, utilizing the full power of the Clean Air Act now will reduce harm to frontline communities living with oil and gas development and help curb further global warming. Reducing methane pollution from the oil and gas industry will also help capture harmful emissions. These include smog- and soot-forming volatile organic compounds, which cause serious heart and lung conditions like asthma attacks and bronchitis, and hazardous air pollutants such as benzene and xylene, known human carcinogens.

Methane pollution from the oil and gas sector is accelerating the pace of climate change and harming the health of our families and communities — and it is a problem that is only getting worse. Oil and gas infrastructure is also next to or nearby some of our most treasured natural and cultural sites on public lands, areas warming at nearly twice the rate of the rest of the country and experiencing dramatic impacts from a changing climate. There is no time to waste, and we cannot miss out on this opportunity to create the strongest standards possible under the Clean Air Act to limit pollution from the oil and gas industry.

Where EPA has proposed protective standards, the agency should follow through and finalize those standards as quickly as possible. These include eliminating the use of outdated, intentionally-polluting pneumatic controllers and requiring a transition to zero-emitting solutions, strong leak detection and repair requirements that cover all polluting wells, and a requirement that abandoned wells are subject to monitoring until closure and that oil and gas companies submit a closure plan and conduct a post-closure survey.

While we are encouraged by the November 2022 draft rule, additional improvements must be made in order to protect nearby communities and help tackle the impending climate crisis. We urge the EPA to:

- **Eliminate routine flaring** - The EPA must ensure that operators at wells capture associated gas and strictly limit flaring of that gas to instances in which it is necessary for safety or maintenance reasons.
- **Expand the threshold for storage tanks.** The supplemental rulemaking did not expand the applicability threshold for storage vessels, which are prevalent throughout communities impacted by oil and gas development.. The EPA should strengthen the standards to address emissions from storage tanks by making the standards applicable to more tanks.
- **Include more robust community and third-party monitoring in the Super Emitter Response Program.** The EPA must provide a clear pathway for communities and third parties to participate and engage in this program. The EPA must ensure that data from approved monitoring technologies are accessible to all, including the use of Optical Gas Imaging cameras.

These important gaps on critical issues must be addressed to prioritize public health, protect frontline communities, and hold oil and gas companies accountable. In addition to these improvements, we also urge the EPA to move as quickly as possible to implement and finalize these rules. Communities and the climate are being harmed right now. It is critical that EPA moves quickly to finalize national rules. Once the ink dries and these rules are enacted, states must quickly work to write State Implementation Plans (SIPs) to show how they will implement and enforce new federal standards on the ground. In cases where a State Implementation Plan falls short of meeting federal standards, the EPA must swiftly issue a Federal Implementation Plan (FIP) to eliminate industry self-policing and regulatory capture.

We must couple strong methane regulations to control air pollution from oil and gas development with throwing the full weight of our resources behind decarbonizing our economy to address the climate crisis. Stopgap measures like methane pollution standards will reduce climate pollution and protect communities in the short term, until this country makes the necessary transition away from dirty, dangerous fossil fuels.

Sincerely,

Alamosa Riverkeeper

Atchafalaya Basinkeeper

Bayou City Waterkeeper

Black Warrior Riverkeeper

Bold Alliance

Brighter Green

Cahaba Riverkeeper
Change the Chamber
Change the Chamber
Chispa AZ
Choctawhatchee Riverkeeper
Clean Air Council
Clean Water Action
Collier County Waterkeeper
Columbia Riverkeeper
Conservation Alabama
Conservation Colorado
Conservation Voters of Pennsylvania
Cook Inletkeeper
Coosa River Basin Initiative/Upper Coosa Riverkeeper
Coosa Riverkeeper
Crab Creek Conservancy
Defend Our Future
Earth Ethics, Inc.
Earthworks
Elected Officials to Protect America
Energy Alabama
Environment Texas
Environmental Law & Policy Center
Evergreen Action
FracTracker Alliance
Georgia Clinicians for Climate Action

Georgia State Medical Assoc
GreenLatinos
Haw River Assembly
Healthy Gulf
Humboldt Baykeeper
Illinois Environmental Council
League of Conservation Voters
League of Women Voters of the United States
Living Rivers & Colorado Riverkeeper
Long Island Soundkeeper
Maryland League of Conservation Voters
Matanzas Riverkeeper
Michigan Clinicians for Climate Action
Milwaukee Riverkeeper
Missouri Confluence Waterkeeper
Moms Clean Air Force
Mountain Watershed Association
Narragansett Bay Riverkeeper
Narragansett Baykeeper
National Parks Conservation Association
National Wildlife Federation
NC League of Conservation Voters
Nevada Conservation League
New Jersey League of Conservation Voters
New Mexico Voices for Children
New York League of Conservation Voters

Northern Plains Resource Council
NY/NJ Baykeeper
Orange County Coastkeeper
Our Future West Virginia
Oxfam America
Peconic Baykeeper
Physicians for Social Responsibility Philadelphia
Potomac Riverkeeper Network
Protect PT
Puget Soundkeeper
RE Sources
Respiratory Health Association
Rio Grande Waterkeeper
Russian Riverkeeper
San Antonio Bay Estuarine Waterkeeper
San Diego Coastkeeper
San Juan Citizens Alliance
Seneca Lake Guardian
Seneca Lake Guardian, A Waterkeeper Alliance Affiliate
ShoreRivers
Sierra Club
Snake River Waterkeeper
Spokane Riverkeeper
The Climate Center
The Sludge Hub & Company
Three Rivers Waterkeeper

Tualatin Riverkeepers

Unitarian Universalist Advocacy Network of IL

Upper Allegheny Waterkeeper

Watauga Riverkeeper

Waterkeeper Alliance

Waterkeepers Chesapeake

Waterway Advocates

Western Organization of Resource Councils

Winyah Rivers Alliance