

January 31, 2022

**Comment From Academics and Medical Professionals on the New Source Performance Standards and Emissions Guidelines For Existing Sources in the Oil and Gas Sector**

Dear EPA Administrator Regan,

We write to you today to urge you to strengthen the Environmental Protection Agency's (EPA) proposed updates to the New Source Performance Standards (NSPS) and first-ever emissions guidelines for existing sources in the oil and gas sector to comprehensively protect public health and combat the climate crisis. Oil and gas production is the largest industrial source of methane pollution in the U.S., and methane emissions from the oil and gas industry are accelerating the pace of climate change and creating more frequent and more dangerous weather events that put the health of our families and communities at risk.

While the EPA's proposed methane safeguards are an important step in the right direction, they do not go far enough to meet the moment. We call on the EPA to strengthen these rules to protect everyone, but especially communities on the frontlines of oil and gas development and residents in urban areas where the devastating effects of the climate crisis are, and will continue to be, felt the hardest.

The oil and gas industry in the U.S. alone accounts for 16 million metric tons of methane annually, with the same climate effects as 350 coal plants. In addition, harmful volatile organic compounds (VOCs), including the known carcinogen benzene, leak alongside methane from the same sources. Methane is up to 87 times as potent as carbon dioxide at trapping heat in the atmosphere over a 20-year timeline. This potency creates the perfect conditions for extreme weather events, and the potential for tremendous damage to public property and loss of life. According to the Pennsylvania Auditor General, the total cost of climate change in 2018 in Pennsylvania was \$261 million, with \$125.7 million in infrastructure damage. In August 2021, the Intergovernmental Panel on Climate Change (IPCC) released a dire warning about the climate crisis, and pointed to methane as a major contributor.

We urge the EPA to require regular monitoring at all smaller, leak-prone wells. Research has demonstrated that these wells are responsible for a disproportionate and significant amount of methane pollution from oil and gas sources in Pennsylvania.<sup>1</sup> Research has also shown that many wells that produce less than a barrel of oil per day leak into the atmosphere more than 100 percent of their reported gas production. The proposal includes a requirement that all wells perform an initial survey to establish baseline methane emission estimates, which is critical. However, past performance is no guarantee of future results, and small leak-prone wells,

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<sup>1</sup> "Methane Emissions from Natural Gas Production Sites in the United States: Data Synthesis and National Estimate." Mark Omara, et. al (2018). Environmental Science & Technology 2018 52 (21), 12915-12925. <https://pubs.acs.org/doi/10.1021/acs.est.8b03535> ; "Methane Emissions from Conventional and Unconventional Natural Gas Production Sites in the Marcellus Shale Basin." Mark Omara, et. al (2016). Environmental Science & Technology 2016 50 (4), 2099-2107. <https://pubs.acs.org/doi/abs/10.1021/acs.est.5b05503>

including those emitting below a baseline of 3 tons per year (TPY) of methane, cannot thereafter be exempt from any future inspections. This is especially true given that EPA stated in its proposal that quarterly monitoring is cost-effective at well sites *as low as 2 TPY of methane*. We applaud the EPA for seeking comment on the concept of community monitoring programs to document large emission events, operator malfunctions, and abnormal process conditions; even so, we urge the EPA to establish a meaningful and effective process that allows communities to report such events directly to the EPA or relevant state agencies, rather than having that information be provided solely to the responsible owners or operators. The EPA is in the best position to ensure operators take appropriate and timely action to mitigate emissions and maintain accurate records on such events.

Furthermore, the EPA should require an end to the harmful practice of routine flaring at oil and gas facilities. Flaring gas creates unnecessary and harmful air pollution. The EPA has proposed that all well sites with “reasonably available” sales gas pipelines should be required to reinsert all gathered methane gas emitted at a site into available pipelines. This is a good start, but we urge the EPA to ban flaring at all oil and gas facilities, except in emergencies when they would otherwise have to vent the gas directly to the atmosphere. EPA should require operators to collect all gas that might have otherwise been flared, regardless of the proximity to sales gas pipelines.

The requirement for “no bleed” pneumatic controllers at every new and existing site is commendable, but we urge the EPA to require all electric pneumatic pumps at compressor stations and processing plants.

We urge the EPA to finalize the strongest and most comprehensive methane pollution rules that cut as much methane as possible to safeguard public health and act on climate.

Thank you for your consideration,

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