

Andrew R. Wheeler U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW Washington, D.C. 20460

Nov. 25, 2019

Dear Administrator Wheeler,

We the undersigned write in opposition to the Environmental Protection Agency's rollback of its methane emission standards. Recently, the EPA released a proposed rule to completely eliminate regulations for methane emissions from the oil and gas industry, which would remove from the scope of federal oversight all existing oil and gas facilities nationwide. This is yet another blow to taxpayers and the environment in addition to the agency's separate proposal last fall to significantly weaken pollution control standards adopted in 2016. By doing this, EPA is also attempting to shirk its legal obligation to regulate existing oil and gas pollution sources and protect our health and environment by addressing climate change.

As local elected officials from across the Interior West, we can speak from experience about the realities of climate change. We're seeing more frequent and extreme droughts, heatwaves, floods, wildfires and other impacts that threaten our economies and quality of life. And we know that reducing methane is a key piece of addressing our climate crisis. As such, we can't be serious about addressing climate change while simultaneously undoing protections against a greenhouse gas that's 87 times more potent that carbon dioxide in disrupting the climate. Moreover, a recent study found that the oil and gas industry produces more than 13 million metric tons of methane pollution annually, which is 60 percent more than EPA estimates. Failing to stop preventable methane waste is also a misuse of taxpayer resources. Tens of millions of royalty dollars are wasted each year as a result of wasted natural gas, which means many of our energy-producing western states and communities miss out on critical funding for infrastructure projects, public services and education.

If EPA adopts both proposals and entirely rescinds current methane pollution standards, by EPA's own estimates it would result in 730,000 to 830,000 additional tons of methane from new sources through 2025. Not only is this contradictory to protecting citizens and our environment, it's contradictory to many leading oil and gas companies' own call for responsible, commonsense methane regulations to address energy waste and climate pollution.

Over the past two years, many of the undersigned local elected officials also signed multiple letters to the Interior Department, opposing the Bureau of Land Management's rescission of its own rules to limit methane waste from oil and gas operations on federal land. The reasons are the same: we need to be strengthening, not weakening, federal standards that will cut down on needless methane waste that cheats our taxpayers, pollutes our environment and threatens our public health.

We're proud of the western states that have strengthened their resolve to reduce methane pollution and combat climate change in the midst of so many rollbacks of environmental safeguards at the federal level. Colorado for example, has already created strong, enforceable statewide standards to reduce greenhouse gas emissions and cut down on unnecessary methane waste, and New Mexico is currently in the processing of adopting its own protections against oil and gas pollution. We need these regulations now more than ever. Waste is not a western value, and EPA's elimination of methane regulations – for the sole purpose of giving the oil and gas industry a break that many companies do not even want – is shamefully wasteful, lacks foresight, and is out of step with what American citizens want and deserve.

Sincerely,

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Austin Nunez San Xavier District Chairman Tohono O'odham Nation Arizona

Phyllis Valenzuela San Xavier District Councilmember Tohono O'odham Nation Arizona

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