



February 13, 2023

Mr. Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Regan and the Environmental Protection Agency,

As local, tribal, and state elected officials from across the Interior West, we are writing today to urge the Environmental Protection Agency to make some key improvements to its recently released draft rule to reduce methane emissions and other pollutants from new and existing oil and gas operations.

We applaud the EPA for improving its initial draft rule released in 2021 by incorporating feedback from citizens, elected officials, and non-governmental organizations. However, we believe the final rule must be strengthened in several critical ways to protect frontline communities like ours from pollution, help fight the climate crisis, and prevent the waste of taxpayer resources.

These improvements include:

- Ensuring that operators at oil and gas wells capture associated gas and limit flaring of that gas to instances in which it is necessary for safety or maintenance reasons;
- Strengthening the standards to address emissions from storage tanks by making the standards applicable to more tanks; and
- Providing a clear pathway for communities and individuals to participate and engage in the Super Emitter Response Program, which is designed to quickly address very large leaks from the oil and gas industry, by ensuring that approved monitoring technologies and data are accessible to all.

These loopholes and exclusions must be addressed to ensure the protection of communities affected by oil and gas operations, stop the needless waste of a public resource, and build a healthier, more resilient climate future. Methane is a powerful greenhouse gas 80 times more potent than carbon dioxide and responsible for about 25 percent of the climate change impacts we are experiencing today. For western communities like ours, those impacts manifest as extreme heat and drought, the destruction of wildlife habitat, poor air quality, and depleted water

resources. This consequently impacts our health, livelihoods and local economies, cultural resources, and quality of life.

The oil and gas industry is one of the leading producers of methane pollution in the U.S. In 2019, industry operations leaked and vented more than 16.3 million metric tons of the pollutant, wasting \$2.4 billion in natural gas that could have heated approximately 12.5 million homes for a year. The San Juan Basin, where Western Leaders Network's headquarters is based, is home to one of the largest concentrations of methane in North America, which not only is a waste of taxpayer resources but has also contributed to the region's poor air quality ratings over the past several years from the American Lung Association.

Poor air quality caused by oil and gas pollution disproportionately impacts tribal communities. Environmental degradation on and near tribal lands in the San Juan Basin of New Mexico and Colorado and across the U.S. West contributes to public health crises.

Therefore, federal regulation of methane emissions is critical to the health and safety of our communities and constituents throughout the oil and gas-producing regions in the Interior West. Climate change is one of the greatest threats local and tribal communities across the Interior West face today. Strong federal rules to curb methane pollution from the oil and gas sector are central to addressing it.

The Biden administration listened to the thousands of citizens that weighed in on this rulemaking and acknowledged that when it comes to our climate, we need bold, decisive, and immediate action at the federal level to address this crisis. We applaud the improvements EPA made upon its initial proposal and now ask that the administration make the necessary improvements the draft rule needs to hold the oil and gas industry accountable for pollution.

We look forward to working with you and your agency to finalize these important standards and get them over the finish line to protect our climate, public health, and local economies.

Sincerely,

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Flagstaff City Councilor

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