

December 9, 2020

Biden-Harris Agency Review Team for the Environmental Protection Agency:

As organizations that care about public health, environmental justice, and the fate of our planet's climate, we thank the Biden-Harris administration for committing to move forward with protective standards to reduce methane pollution from the oil and natural gas sector. We write to urge swift action to repeal the Trump-era methane rollbacks and to issue stronger methane emissions standards for new and existing oil and natural gas sites nationwide. Protective standards issued under section 111 of the Clean Air Act that rely on readily available, proven technologies and practices and help to accelerate promising, emerging technologies can reduce methane emissions in 2025 from the oil and gas sector by as much as 65% below 2012 levels.<sup>1</sup> These reductions can be achieved using existing technologies, at low cost. These important pollution controls will not only help stave off catastrophic climate change, but will also protect frontline communities from the harms imposed by air pollution from the oil and gas industry, while creating jobs.

Building from the foundational standards established during the Obama administration, more protective methane reductions from the oil and gas industry are essential to addressing climate change. Methane, the principal component of natural gas, is 86 times more potent than carbon dioxide over a 20 year time period. In addition, smog-causing volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) such as benzene and xylene are released throughout the oil and gas supply chain from initial drilling, through transmission to end use.

A quarter of the global warming we're experiencing is caused by methane emissions, and the emissions from the oil and gas industry are at least 60% higher than previously measured.<sup>2</sup> In fact, the annual methane emissions from this sector have a near-term global warming impact equivalent to the carbon dioxide emissions of the nation's entire car and light-duty truck fleet (using the 20-year global warming potential of methane). This makes methane emissions from oil and gas drilling a far greater threat than previously thought, and reducing emissions an even more important opportunity. Significant reductions can be achieved by broadly implementing a handful of straightforward measures that have already been proven, and that some major oil and gas producing states have relied on in setting their own standards. These include frequent leak detection and repair at all sites, replacement of high-emitting equipment, capture of vented gas, and proper waste minimization techniques. These measures dovetail with President-elect Biden's mission to "Build Back Better" and would ensure that the solutions to our methane pollution problem would create American jobs for both oil and gas workers and others.

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<sup>1</sup> Clean Air Task Force. Reducing Methane from Oil and Gas: A Path to a 65 Percent Reduction in Sector Emissions. April 24, 2020.

<https://www.catf.us/resource/reducing-methane-from-oil-and-gas/>

<sup>2</sup> <https://www.edf.org/climate/methane-studies>

Protective pollution safeguards for the oil and natural gas sector would also deliver important benefits to frontline communities. Frontline communities, including communities of color, bear the brunt of the impacts of the oil and gas sector's air pollution, and deserve to be able to breathe cleaner air. More than 9 million people live within half a mile of an active oil or gas well nationally, including 2.5 million people of color.<sup>3</sup>

Nationally, EPA estimates air pollution from the oil and gas industry causes more than one million asthma attacks in children each year.<sup>4</sup> Other research shows this includes more than 150,000 asthma attacks for Latino children and 140,000 for African American children.<sup>5</sup> Latinos are twice as likely, and Black children are four times as likely as non-Hispanic whites, to visit the emergency room for asthma.<sup>6, 7</sup>

Strengthened standards to reduce oil and gas methane pollution are broadly supported by health, environmental and community groups, states and cities, faith-based organizations, academics, investors, and companies, including some major and independent oil and gas producers. And, we know voluntary actions and other half measures are not enough to cut the emissions of harmful, climate-disrupting methane pollution from oil and gas operations and will not adequately protect impacted communities. Accordingly, we respectfully urge you to move forward swiftly with protective, enforceable methane standards to reduce climate pollution and protect communities across the country, while this country makes the necessary transition towards a clean energy economy.

Sincerely,

350 Santa Fe  
Alliance of Nurses for Healthy Environments  
Beaver County Marcellus Awareness (BCMAC)  
Better Path Coalition  
CAVU

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<sup>3</sup> Environmental Defense Fund, *Federal Methane Map*, <http://www.edf.org/federalmethanemap/>.

<sup>4</sup> Fann N, Baker KR, Chan EAW, Eyth A, Macpherson A, Miller E, et al. 2018. Assessing human health PM2.5 and ozone impacts from U.S. oil and natural gas sector emissions in 2025. *Environ Sci Technol* 52(15):8095–8103.

<sup>5</sup> Clean Air Task Force and the National Association for the Advancement of Colored People. *Fumes Across the Fence-line: The Health Impacts of Air Pollution from Oil and Gas Facilities on African American Communities*. November 2017. [https://www.catf.us/wp-content/uploads/2017/11/CATF\\_Pub\\_FumesAcrossTheFenceLine.pdf](https://www.catf.us/wp-content/uploads/2017/11/CATF_Pub_FumesAcrossTheFenceLine.pdf)

Clean Air Task Force, League of United Latin American Citizens (LULAC), and National Hispanic Medical Association (NHMA). *Latino Communities at Risk: The Impact of Air Pollution from the Oil and Gas Industry*. September 2016. [https://www.catf.us/wp-content/uploads/2016/09/CATF\\_Pub\\_LatinoCommunitiesAtRisk.pdf](https://www.catf.us/wp-content/uploads/2016/09/CATF_Pub_LatinoCommunitiesAtRisk.pdf)

<sup>6</sup> Asthma and Hispanic Americans. (2017). U.S. Department of Health and Human Services, Office of Minority Health. Retrieved from: <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=60>

<sup>7</sup> Asthma and African Americans. (2018). U.S. Department of Health and Human Services, Office of Minority Health. Retrieved from: <https://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlid=15>

Center for Civic Policy  
Clean Air Council  
Clean Air Task Force  
Climate Reality Project  
Conservation Voters New Mexico  
Dakota Resource Council  
Devil's Spring Ranch  
Earthjustice  
Earthworks  
Environmental Defense Fund  
Environmental Law & Policy Center  
Friends of the Earth United States  
Green America  
GreenLatinos  
Interfaith Power & Light  
League of Conservation Voters  
Lebanon Pipeline Awareness  
Moms Clean Air Force  
National Parks Conservation Association  
Natural Resources Defense Council  
New Mexico Environmental Law Center  
New Mexico Interfaith Power and Light  
New Mexico Sportsmen  
Oxfam America  
Powder River Basin Resource Council  
Project CoffeeHouse  
Quittapahilla Watershed Association  
Responsible Drilling Alliance (RDA)  
Rio Grande Indivisible - NM  
Rocky Mountain Farmers Union  
Santa Fe Green Chamber of Commerce  
Sierra Club  
The Evangelical Environmental Network  
Union of Concerned Scientists  
UUJusticePA  
Waterkeeper Alliance, Inc.  
Western Colorado Alliance  
Western Organization of Resource Councils  
Young Evangelicals for Climate Action