The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street N.W.
Washington, DC 20240

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

December 5, 2013

Dear Secretary Jewell and Administrator McCarthy,

We write to offer our support in reducing methane emissions from the oil and gas industry, a key component of President Obama’s strategy to meet our climate pollution reduction goals. In presenting his Climate Action Plan to the Nation, the President acknowledged that “[c]urbing emissions of methane is critical to our overall effort to address global climate change.” We agree, and would like to work with you to pursue three vital avenues to substantially reduce these harmful emissions through Environmental Protection Agency (EPA) and Department of the Interior regulations of methane emissions from oil and natural gas systems. These systems are the largest source of methane pollution in the U.S., and cleaning them up now is essential to meeting the Administration’s commitment to cut greenhouse gas emissions by 17 percent from 2005 levels by 2020.

Current regulations and practices in the oil and gas industry continue to allow for the unnecessary release of large amounts of methane. EPA’s most recent U.S. Greenhouse Gas Inventory shows that the oil and gas industry leaked or released approximately 8.4 million metric tons of methane in 2011, comparable to the CO₂ emissions of at least 60 coal-fired power plants. These estimates are conservative: methane’s impacts are even more powerful in the near term, and recent research suggests that EPA’s figures may be far too low.¹ In addition, methane and other volatile organic compounds (VOCs) in the leaked gas contribute to ground-level ozone, leading to respiratory illnesses and related deaths and the loss of millions of dollars worth of agricultural products each year. Fortunately, as EPA’s Natural Gas Star program and others have shown repeatedly, significant reductions in these emissions are within reach. Methane emissions from leaks, deliberate release of gas from oil and gas wells, and emissions from compressors, processing equipment, tanks, and pipelines can be reduced with off-the-shelf technologies. In many cases these technologies pay for themselves quickly, even at today’s low natural gas price.

We commend EPA for updating its VOCs performance standards for this industry in 2012, but the job is far from finished. While some reductions in methane emissions will be achieved as a co-benefit of these 2012 rules, many emission sources are not adequately addressed, such as the...
vast network of equipment that was installed before those rules went into effect. EPA needs to take immediate steps to produce regulations to directly reduce methane pollution from new and existing equipment from this industry.

The Department of the Interior has 33-year-old policies that need updating to prevent unnecessary and wasteful methane pollution. We urge the Department to update its methane controls quickly. Leaking, venting, and flaring of methane from oil and gas sources is a large waste of a valuable energy resource, and the Mineral Leasing Act of 1920 requires the Bureau of Land Management to include provisions in its leases that ensure producers will “use all reasonable precautions to prevent waste of oil or gas developed....” Reducing this waste would increase royalties paid to the government and reduce dangerous pollution.

Finally, although the Department of the Interior’s Bureau of Ocean Energy Management (BOEM) is now responsible for controlling air pollution from offshore Arctic oil and gas sources, BOEM’s current regulations were developed for the Gulf of Mexico. BOEM must develop rules specific to the challenging and fragile environment of the Arctic. Additionally, some of BOEM’s current rules are 30 years out of date, even for the Gulf facilities they were meant to address. More than 17 billion cubic feet of gas is flared offshore. That amount is equivalent to almost half of the total gas produced offshore in California. BOEM must modernize these regulations not only to reflect achievable emission controls, but also to recognize the very real differences between oil and gas operations in the Arctic and those in the Gulf of Mexico.

We look forward to supporting EPA and the Department of the Interior in their efforts to curb methane pollution from the oil and natural gas industries. Cleaning up methane emissions is a critical near-term step toward implementation of President Obama’s new Climate Action Plan and continued U.S. leadership on climate protection and healthier air.

Sincerely,

National Organizations

Katie Huffling, RN, MS, CNM, Director of Programs
Alliance of Nurses for Healthy Environments

Susan Arnold, Vice President for Conservation
Appalachian Mountain Club

Annie Sartor, Policy and Campaigns Coordinator
Breast Cancer Action

Ron White, Director of Regulatory Policy
Center for Effective Government

Sue Chiang, MPH, MPP, Pollution Prevention Co-Director
Center for Environmental Health
Lois Gibbs, Executive Director
Center for Health, Environment & Justice

Conrad Schneider, Advocacy Director
Clean Air Task Force

Lynn Thorp, National Campaigns Director
Clean Water Action

Harriet Shugarman, Executive Director
Climate Mama

Kassie Siegel, Director
Climate Law Institute
Center for Biological Diversity

John Kassel, President
Conservation Law Foundation

Kathleen Rogers, President
Earth Day Network

Marty Hayden, Vice President of Policy and Legislation
Earthjustice

Lauren Pagel, Policy Director
Earthworks

Bruce Gordon, Executive Director
EcoFlight

Carol F. Kwiatkowski, PhD, Executive Director
The Endocrine Disruption Exchange

Anna Aurilio, Director
Washington, DC Office
Environment America

Carol Werner, Executive Director
Environmental and Energy Study Institute

Elizabeth Thompson, President
Environmental Defense Action Fund

Jennifer L. Cassel, Staff Attorney
The Environmental Law & Policy Center
Heather White, Executive Director
Environmental Working Group

Tom Goldtooth, Executive Director
Indigenous Environmental Network

Susan Stephenson, Executive Director
The Regeneration Project
Interfaith Power & Light

Valerie Serrels, Director
Kids vs. Global Warming

Tiernan Sittenfeld, Senior Vice President, Government Affairs
League of Conservation Voters

Dominique Browning, Co-Founder and Senior Director
Moms Clean Air Force

Mark Wenzler, Vice President, Landscape Conservation Program
National Parks Conservation Association

Jim Lyon, Vice President for Conservation Policy
National Wildlife Federation

David Doniger, Policy Director, Climate & Clean Air Program
Natural Resources Defense Council

Seth B. Shonkoff, PhD MPH, Executive Director
Physicians, Scientists, & Engineers for Healthy Energy

Daniel R. Patterson, Ecologist and Southwest Director
Public Employees for Environmental Responsibility

Deborah J. Nardone, Director
Beyond Natural Gas Campaign
Sierra Club

Jeremy Nichols, Climate & Energy Program Director
WildEarth Guardians

David Alberswerth, Senior Policy Advisor
The Wilderness Society

Erin Thompson Switalksi, Executive Director
Women’s Voices for the Earth
Regional, State, and Local Organizations

Pamela Miller, Executive Director
Alaska Community Action on Toxics

Kristen Miller, Government Affairs Director
Alaska Wilderness League

Tom Cormons, Executive Director
Appalachian Voices

Oscar Simpson, Public Lands / Legislative Chair
Backcountry Horsemen of New Mexico

Karin Feridun, Founder
Berks Gas Truth

Rebecca Roter, Chairperson
Breathe Easy Susquehanna County

Mike Painter, Coordinator
Californians for Western Wildness

Jill Wiener
Catskill Citizens for Safe Energy

Wes Gillingham, Program Director
Catskill Mountainkeeper

John White, Executive Director
Center for Energy Efficiency and Renewable Technologies

Matia Vanderbilt, Co-founder / Board Member
Citizen Shale

Paul Ferrazzi, Executive Director
Citizens Coalition for a Safe Community

Jim Ramey, Director
Citizens for a Healthy Community

Ted Glick, National Campaign Coordinator
Chesapeake Climate Action Center

Barbara Warren, Executive Director
Citizens’ Environmental Coalition
June Blotnick, Executive Director  
Clean Air Carolina  

Joseph Otis Minott, Esq., Executive Director  
Clean Air Council  

Josh McNeil, Director  
Conservation Voters of Pennsylvania  

Ben Shavelson, Cook Inletkeeper  
Cook Inletkeeper  

Theodora Bird Bear, Oil and Gas Task Force Chair  
Dakota Resource Council  

Maya van Rossum, the Delaware Riverkeeper  
Delaware Riverkeeper Network  

Sanders Moore, Director  
Environment New Mexico  

Nancy Schietzelt, President of the Board of Directors  
Environmental Defenders of McHenry County, Illinois  

Gary Graham Hughes, Executive Director  
Environmental Protection Information Center  

Judy Braiman, President  
Empire State Consumer Project  

Taylor McKinnon, Director of Energy  
Grand Canyon Trust  

Shelley Silbert, Executive Director  
Great Old Broads for Wilderness  

Joe Osborne, Legal Director  
Group Against Smog and Pollution  

Elizabeth Crowe, Executive Director  
Kentucky Environmental Foundation  

Kimberly Baker, Executive Director  
Klamath Forest Alliance
Julie Ann Edgar, Organizer
Lehigh Valley Gas Truth

Jim Kuyper, Executive Director
Los Padres ForestWatch

Rebecca Cheatham, Manager
Medical Advocates for Healthy Air

Jim Jensen, Executive Director
Montana Environmental Information Center

Dorothy Felix, President
Mossville Environmental Action Now

Melinda Hughes-Wert, President
Nature Abounds

Jim Warren, Executive Director
NC WARN

Joan Brown, osf, Executive Director
New Mexico Interfaith Power and Light

Oscar Simpson, Chair
New Mexico Sportsmen

Erik VanderBeek, Oil and Gas Task Force Chair
Northern Plains Resource Council

Mark Riskedahl, Executive Director
Northwest Environmental Defense Center

Adam Garber, Field Director
PennEnvironment

Christine E. Simeone, Director
Energy Center
PennFuture

Teresa Méndez-Quigley, MSW, LSW, Director, Environmental Health Programs
Physicians for Social Responsibility Philadelphia

Gillian Malone, Chair
Powder River Basin Resource Council
Tom Smith, Texas Director
Public Citizen of Texas

Dan Randolph, Executive Director
San Juan Citizens Alliance

Anne Blair, Clean Fuels and Bioenergy Director
Southern Alliance for Clean Energy

Steve Bloch, Legal Director
Southern Utah Wilderness Alliance

Sarah Wright, Executive Director
Utah Clean Energy

Erik Schlenker-Goodrich, Executive Director
Western Environmental Law Center

Donald Nelson, Oil and Gas Campaign Team Chair
Western Organization of Resource Councils

John Nielsen, Interim President
Western Resource Advocates

Will Roush, Conservation Advocate
Wilderness Workshop

Bruce Pendery, Chief Legal Counsel
Wyoming Outdoor Council
CC:
The Honorable Tommy Beaudreau
Acting Assistant Secretary, Land and Minerals Management
Director, Bureau of Ocean Energy Management
U.S. Department of the Interior

The Honorable Neil Kornze
Principal Deputy Director, Bureau of Land Management
U.S. Department of the Interior

The Honorable Janet McCabe
Acting Assistant Administrator, Office of Air and Radiation
U.S. Environmental Protection Agency

