

ROBERT P. CASEY, JR.
PENNSYLVANIA

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United States Senate

WASHINGTON, DC 20510

November 25, 2019

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, District of Columbia 20460

Dear Administrator Wheeler:

I write in opposition to the U.S. Environmental Protection Agency's (EPA) proposal to eliminate federal methane controls from the 2016 New Source Performance Standards (NSPS) for oil and gas facilities. EPA's proposal fails to address the urgent threat from climate change and endangers the health of Americans living near oil and gas facilities. I urge you to keep the existing regulations in place in order to protect clean air, our communities and future generations.

Methane is the main component of natural gas and up to 86 times more potent as a greenhouse gas than carbon dioxide over a twenty-year timeline. EPA has identified it as the second-most prevalent greenhouse gas emitted in the U.S. from human activities, and a quarter of methane is produced by the natural gas and oil industries. Reducing methane emissions leaks is an essential step in addressing greenhouse gas emissions and mitigating climate change.

Pennsylvania is the second-largest natural gas producing state, and over half a million tons of methane leak annually in the Commonwealth, accompanied by more than 54,000 tons of volatile organic compounds (VOCs) annually. In addition to the environmental and health benefits of the existing standards, these standards incentivize good-paying jobs in a burgeoning methane mitigation industry in Pennsylvania, which already boasts dozens of new businesses in the state including company headquarters, manufacturing facilities, equipment maintenance facilities, sales centers and leak detection and repair services.

Major oil and gas companies also recognize the importance of reducing methane emissions and have spoken out in opposition to the rollback. These companies recognize the economic and environmental importance of cutting methane emissions and are publicly demanding that the administration abandon this plan and keep federal methane rules in place. The oil and gas sector is already investing and ready to continue to investing in leak and repair technology to reduce emissions.

Governor Wolf's efforts to reduce methane at the state level are a critical step forward, but Pennsylvanians cannot go it alone and continued federal protections are critical. Governor Wolf is set to propose rules for existing sources in December 2019, however, these standards end at the state line, and Pennsylvania's methane controls are limited to oil and gas sources constructed after August 8, 2018, while the federal standards cover many of the sources built before 2018. Under EPA's proposed rollbacks, over 2,000 wells will see fewer routine inspections, resulting in more methane leaks and more devastating public health impacts.

Methane emissions are a major contributor to the climate change impacts already being felt in Pennsylvania and around the world today. Pennsylvanians are facing more flooding, increased risk of vector-borne diseases and extreme weather events.

The 2016 NSPS for the oil and gas industry has helped reduce methane waste from natural gas infrastructure in Pennsylvania and across the Nation over the past three years. EPA's proposal to roll back these standards will result in increased air pollution from natural gas operations, harm to public health and exacerbate the devastating impacts of climate change.

I urge you to withdraw this proposal and keep existing methane rules in place.

Sincerely,

A handwritten signature in blue ink that reads "Bob Casey, Jr." in a cursive style.

Robert P. Casey, Jr.
United States Senator