

# United States Senate

WASHINGTON, DC 20510

April 27, 2018

The Honorable E. Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Attn: EPA-HQ-OAR-2015-0216

Dear Administrator Pruitt:

We write in strong opposition to the Environmental Protection Agency's (EPA) recent proposal to withdraw the 2016 Control Techniques Guidelines for the Oil and Natural Gas Industry (Oil and Gas CTG). The proposed withdrawal will sacrifice public health, increase climate-changing methane emissions, and prevent opportunities for highly cost-effective volatile organic compound (VOC) emission reductions from the oil and gas sector.

The 2016 Oil and Gas CTG provided assistance to states in reducing smog-forming VOC emissions from existing oil and natural gas equipment and processes, as part of their state plans for meeting EPA's national standards for ground-level ozone. The CTG was part of a suite of commonsense requirements to combat climate change, reduce air pollution that harms public health, and provide greater certainty about Clean Air Act permitting requirements for the oil and gas industry.

The recommendations in the Oil and Gas CTG include technologies and approaches, such as replacing high-bleed pneumatic controllers with low-bleed controllers and replacing rod packing on a regular recommended schedule, that are widely available at a reasonable cost to reduce the amount of methane and VOCs vented to the air. Technologies and approaches such as these can help save natural gas that otherwise would go to waste. More than 20 oil and gas companies have already make a pledge to install some of the technologies mentioned in the EPA's CTGs.

VOCs contribute to the formation of ground-level ozone, or smog, which can harm the respiratory system, aggravate asthma and lung diseases, and is linked to premature death from respiratory causes. In their proposed withdrawal, EPA estimated that the Oil and Gas CTG would reduce VOC emissions by over 60,000 tons per year, methane emissions by nearly 200,000 tons per year, and air toxics—which are known or suspected to cause cancer and other serious health effects—by over 2,000 tons per year.

Both Colorado and Wyoming have demonstrated cost-effective VOC emissions reductions from existing oil and gas sources. For instance, Colorado estimated that their air emission control requirements on oil and gas cost facilities approximately \$453 per ton of VOCs reduced, far below the threshold of \$15,000 per ton that EPA has used as a threshold for cost-effective ozone reduction measures. What's more, methane waste reduction rules, like Colorado's, help create jobs in the methane mitigation industry. A recent study indicates that over 130 companies, with

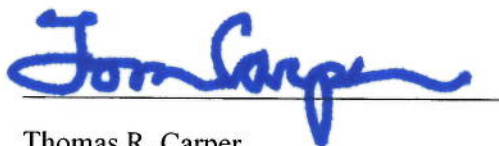
customers in almost every state across the country, are helping to manufacture the technology and provide the services needed to cut methane emissions. And these companies have already experienced up to 30 percent business growth in states that have methane regulations.

The CTGs benefit public health, provide certainty for industry as well as an opportunity to get credit for reducing methane emissions in their ozone SIP, and reduce wasted natural gas. We are confident that EPA will recognize the value of the Oil and Gas CTG and urge EPA to maintain the Oil and Gas CTGs for methane.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael F. Bennet", written over a horizontal line.

Michael F. Bennet  
United States Senator

A handwritten signature in blue ink, appearing to read "Tom Carper", written over a horizontal line.

Thomas R. Carper  
United States Senator