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U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

March 8, 2017

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

Dear Administrator Pruitt:

We are writing to ask you to resume collecting methane emission data from oil and gas operators under the Environmental Protection Agency's (EPA's) Information Collection Request (ICR) 2548.01. Accurate data from oil and gas operators are essential for setting appropriate and cost-effective standards for reducing methane emissions, which are necessary for improving air quality, mitigating climate change, and ensuring that a valuable commodity does not continue to be wasted.

Methane is an aggressively potent greenhouse gas, with at least 25 times the warming potential of carbon dioxide over a century, and a precursor to ground-level ozone, one of the criteria pollutants under the Clean Air Act. Methane emissions from oil and gas fields also contain volatile organic chemicals that contribute to smog, ozone, and cancer. Controlling methane emissions from oil and gas operations is therefore important not just for the climate, but also for air quality and human health.

As the ICR rightly notes, oil and gas facilities are the number one source of industrial methane emissions in the United States. Despite claims by the oil and gas industry that methane emissions have decreased since 1990 due to voluntary actions on behalf of oil and gas producers, all of that reduction has occurred in the storage, transmission, and distribution sectors. EPA's data show that since 1990, methane emissions from oil and gas field operations have increased 45 percent. The ICR is critical to understanding why those emissions continue to increase, and what can be done to turn that around.

Recently, the House passed House Joint Resolution (H. J. Res.) 36 along largely party lines, which would repeal the Bureau of Land Management's (BLM's) rules for controlling methane waste from existing and new oil and gas operations on federal and Indian lands. The BLM rule is designed to ensure that companies do not waste valuable natural gas belonging to the American people, who are entitled to royalties on the gas when it is captured and sold.
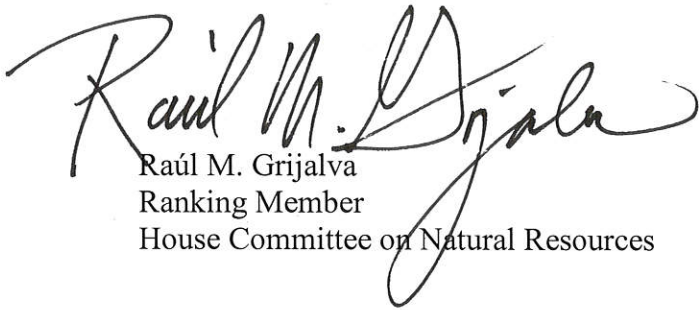
We vehemently disagree with the decision by the House to pass H. J. Res. 36, and hope the Senate will uphold BLM's right to prevent methane waste. One of the arguments that we

heard repeatedly from opponents of the rule was the fallacious charge that it was an air quality rule, and the EPA is the appropriate agency for such rules. But that argument assumes that the EPA will take charge and control methane emissions from the roughly 600,000 oil and gas wells on private and state lands. Withdrawing the ICR pointlessly slows down the effort to control unnecessary methane emissions from those sources.

Even the March 1, 2017, letter you received from eleven governors and state attorneys general admits that the cost of the ICR is negligible: no more than $5,800 per company, or roughly 0.1% of the average cost of an onshore well according to the Energy Information Administration. This is a miniscule price to pay for critically important data, which you would hope the oil and gas industry would happily provide in the service of more accurate and less onerous final regulations.

Withdrawing this common-sense and inexpensive data-gathering exercise at the behest of a few states simply because it takes climate change seriously is irresponsible and counterproductive. It is EPA's job to address harmful and wasteful methane emissions from oil and gas sites, and we/ hope that you will take this responsibility seriously and reinstate the ICR and develop new methane regulations as expeditiously as possible.

Sincerely,

Raúl M. Grijalva
Ranking Member
House Committee on Natural Resources

Alan Lowenthal
Ranking Member
House Subcommittee on Energy
and Mineral Resources