## Subject: Even industry leaders don't support the forthcoming proposal to eliminate EPA's methane standards



Dear Journalist,

In the coming days, the Trump EPA is expected to send the White House a proposal to eliminate direct regulation of methane emissions from oil and gas facilities. This, along with an <u>earlier</u> methane rollback, is an effort to dramatically weaken pollution limits at new and recently built oil and gas wells, and an attempt to prevent **any** federal oversight of pollution from the remaining 850,000 plus 'existing' oil and gas facilities across the country.

This likely move comes just weeks after a chorus of leading oil and gas companies spoke out in favor of not only keeping direct federal regulation of methane, but also going further and asking for the methane rules to be expanded to existing facilities.

## President Trump and EPA Administrator Wheeler should listen to the growing group of companies who want to keep the EPA methane rules in place.

<u>Shell</u> and <u>BP</u> both recently spoke out very publicly in the media in favor of keeping the rules for methane intact, and asked the Trump administration to extend them to existing sources. <u>ExxonMobil</u> and <u>Equinor</u> have also recently spoke out in favor of both new and existing source EPA methane rules.

#### No substitute for strong federal standards

These company statements come as a broader focus is being placed on climate action across the country, and amid a growing number of companies taking steps to reduce methane pollution from their own operations.

As BP recently <u>said in an op-ed</u>, companies should realize that federal rules keep methane pollution across the whole industry in check and help "protect natural gas's license to operate." BP continued saying "voluntary actions by several energy companies are not enough to solve the problem."

However, to date, a number of oil and gas companies that are active in monitoring and mitigating methane emissions, including ConocoPhillips Cheniere, and Noble Energy, have not yet disclosed their position on continued federal methane regulation. Notably, companies like these are facing increasing pressure from investors to support smart methane policies.

### API a broken record against direct regulation of methane

While an increasing number of companies recognize the critical importance of reducing this pollution across the industry, the leading oil and gas lobby in Washington is doing its best to <u>drag the industry</u> <u>backward</u>. The American Petroleum Institute (API) continues to push EPA to weaken and now to eliminate methane regulation for new sources in an attempt to prevent **any** regulation of methane from existing sources.

In comments to EPA as recently as this December, API <u>said</u> that since before 2012 "our objective has remained the identification of cost-effective emission control requirements that reduce VOC emissions for new and modified sources" rather than direct regulation of methane.

While API tries to downplay the impact of changing the rules to only regulate smog-forming volatile organic compounds instead of methane, it would be **very significant**. By urging EPA now to deregulate methane emissions from new and modified sources, API is attempting to set the foundation to argue that EPA is precluded from ever regulating pollution from the vast majority of the country's oil and gas wells.

#### Methane is the low-hanging fruit in addressing climate change

Oil and gas methane pollution is a large contributor to climate change and a leading source of potent methane pollution in the United States. An <u>extensive scientific study</u> concluded in 2018 found the U.S. oil and gas industry emits over 13 million metric tons of methane pollution every year. That is 60 percent higher than EPA estimates suggest, and has a short-term climate impact equal to driving more than 200 million cars on the road for a year.

Fortunately, cutting methane emissions is achievable with today's technology and cost effective. IEA <u>found</u> that globally, the oil and gas industry could cut around 40-50% of current methane emissions at no net cost. Moreover, EDF, in collaboration with the Environmental Council of States, <u>recently</u> <u>released a report</u> that summarizes a range of options to help policy makers adopt innovative technologies that could make it even cheaper and easier to find and fix methane leaks.

# If the oil and gas industry as a whole is serious about addressing its climate impact, more companies need to speak out in support of continued direct regulation of methane, both with their trade associations and with the Trump Administration.

We will be closely watching what other companies, as well as the Trump administration, do in the coming weeks regarding this rule, and we would be happy to talk about these issues further. Feel free to reach out.

Sincerely,

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And

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