



September 25, 2019

Administrator Andrew R. Wheeler
U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2017-0757
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Wheeler:

Thank you for providing an opportunity to comment on the proposed amendments to the 2012 and 2016 New Source Performance Standards (NSPS) for the Oil and Natural Gas Industry. On behalf of the Metropolitan Washington Council of Governments' (COG) Climate, Energy and Environment Policy Committee (CEEPC), we urge you to maintain the New Source Performance Standards, as prescribed in the 2012 and 2016 Final Rules.

CEEPC serves as COG's principal policy adviser on climate change, and their work includes a regional climate change strategy to meet the greenhouse gas reduction goals adopted by the Board. Our shared goals and commitments under the regional climate strategy relies on the federal government adoption and enforcement of standards that require control of both methane and Volatile Organic Compounds (VOCs) emissions from oil and gas facilities – each has a distinct scope and scale of impacts and consequences. The EPA's proposed amendments to the NSPS would eliminate any federal oversight of these pollutants from oil and gas transmission and storage facilities, including in the metropolitan Washington region and airshed, and remove safeguards for new sources in the oil and gas supply chain. This will substantially undermine the efforts of our localities to meet critical commitments to reduce greenhouse gas (GHG) emissions, including methane.

Methane leakage occurs at all phases of production and distribution (collection, production, processing, transmission and storage, and distribution). Most importantly, it is a highly potent greenhouse, with an overall heat-trapping capacity more than 80 times greater than carbon dioxide for the first 20 years following release. Thus, a new reservoir of released methane will not only escalate the atmosphere's capacity to entrap and increase heat but also diminish progress and nullify substantial and ongoing investments made by responsible jurisdictions across the globe, including those comprising the metropolitan Washington area. From an industry perspective, we join Shell, British Petroleum and Exxon, companies that have reaffirmed their intent to voluntarily comply with the standards of the 2012 and 2016 Final Rules, in requesting that the existing rules be maintained.

While significant progress has been made in the metropolitan Washington area to reduce emissions of harmful pollutants and GHG emissions, addressing sources of methane and VOC emissions is critical to continuing to deliver cleaner air for the residents of the region. The role of the federal government's leadership in delivering effective regulatory limits on methane emissions from oil and gas production and processing facilities, as well as transmission and storage sources is a critical component of our ability to meet our adopted and mandated environmental objectives. As such, CEEPC believes the NSPS are needed, appropriate, and should be maintained as they are.

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For these reasons, we urge the EPA to stand by the 2012 and 2016 Final Rules and maintain the NSPS.

Thank you again for the opportunity to provide comments on the EPA's proposed amendments to the 2012 and 2016 NSPS for the Oil and Natural Gas Industry.

Sincerely,

The Honorable Daniel Sze
Chair, Climate Energy and Environment Policy Committee (CEEPC)