Good morning. My name is Grace Smith and I’m an Attorney on the U.S. Clean Air Team at Environmental Defense Fund. We want to thank the EPA for holding a public hearing on its proposed oil and gas rule and for considering our views on reducing methane emissions from the oil and gas sector. The EPA’s proposal is historic, applying for the first time to the nation’s nearly one million existing oil and gas facilities, and we commend EPA for moving forward swiftly with proposed standards that are urgently needed to address this harmful pollution. EDF strongly supports several aspects of the proposal. However, final standards must be further strengthened to require regular monitoring across smaller, leak-prone wells and address the wasteful practice of flaring. EDF supports EPA’s plan to further address these issues in a supplemental proposal. Today, I’d like to kick-off EDF testimony by highlighting the urgent need for EPA standards and the potentially transformative nature of EPA’s proposal, and by commenting on EPA’s proposed standards for pneumatic devices. My colleagues, Edwin LaMair and Grace Weatherall, will be providing comments on other aspects of EPA’s standards.

The anthropogenic climate crisis is no longer an abstract future event; it is upon us, already wreaking havoc in the form of wildfires, flooding along the coasts and in the Midwest, and unprecedented heat waves. The Intergovernmental Panel on Climate Change (IPCC) projects that we have a chance to slow these impacts and limit global temperature rise to 1.5 degrees, but only if governments initiate immediate, rapid, and large-scale reductions in greenhouse gas emissions. It singles out tackling methane as a critical solution.

Methane is a climate pollutant with over eighty times the global warming power of carbon dioxide in the near term — at least 25% of the warming we experience today is caused by human-made methane emissions. Fortunately, due to methane’s short life, reducing emissions from fossil fuel operations represents one of the best near-term solutions for limiting climate change.

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2 Intergovernmental Panel on Climate Change, Climate change widespread, rapid, and intensifying - IPCC (August 9, 2021), https://www.ipcc.ch/2021/08/09/ar6-wg1-20210809-pr/

3 Id.


The oil and natural gas sector is the largest industrial emitter of methane, representing nearly half of domestic emissions. It is also the sector with the greatest reduction potential. A significant portion of emissions from the sector is the result of outdated equipment that operators can cost-effectively replace with zero-emitting technologies and the result of leaks that can be detected and fixed. Deploying these feasible measures now would cut methane pollution in half by 2030, avoid up to a quarter degree of warming by midcentury, and help to satisfy the U.S.’s commitments under the new Global Methane Pledge.

Reducing methane emissions is not only necessary for slowing climate change, but also for protecting the frontline communities that face negative health impacts due to their proximity to oil and gas development. Smog-forming, volatile organic compounds and toxic air pollutants like benzene are emitted alongside methane, and these dangerous pollutants can lead to irreversible lung damage, asthma attacks, and cancer. Around 9 million people in the U.S. live in close proximity to oil and gas sites, and an analysis from EPA predicts that air pollution from the oil and gas sector will lead to 1,970 premature deaths in 2025 alone. As well, the Administrator’s Journey to Justice Tour in the South underscored the need for urgent action for communities that have felt the impacts of pollution for decades. By taking bold action on methane and other harmful pollutants from the oil and gas sector, EPA can begin to reduce pollution in communities that have long borne disproportionate health burdens and show them that it listened to community concerns.

One of the most important steps EPA can take as it addresses methane is to eliminate emissions from pneumatic devices. Oil and gas operations in North America have traditionally relied heavily upon natural gas-driven pneumatic controllers that automatically emit methane as they

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10 Id.
12 Ocko, et al., Acting rapidly to deploy readily available methane mitigation measures by sector can immediately slow global warming, 16 Env. Research Letters 054042 (2021), https://doi.org/10.1088/1748-9326/abf9c8
16 Fann, et al. at 8099.
operate. In 2019, pneumatic controllers contributed significantly to emissions from the production segment, which, according to EPA inventories, accounts for 96% of methane emissions from the sector.\footnote{U.S. Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019 3-71, https://www.epa.gov/sites/default/files/2021-04/documents/us-ghg-inventory-2021-main-text.pdf?VersionId=yu89kg1O2qP754CdR8Qmyn4RRWc5iodZ}

EDF strongly supports EPA’s proposed standards for pneumatic controllers – protective requirements that operators install zero-emitting controllers at both new and existing facilities other than those located on the north slope of Alaska. There are several available zero-emitting options for operators on and off the grid, and these technologies are cost-effective since compliance costs can be offset by the capture and sale of natural gas that would otherwise be wasted. EQT, the largest natural gas operator in the country, has committed to replacing all its pneumatic devices by 2023.\footnote{ESG Report Calendar Year 2020, Environment: Climate and GHG Emissions https://esg.eqt.com/environmental/climate-and-ghg-emissions/#strategy (accessed Nov. 25, 2021).} Moreover, states like Colorado\footnote{5 Colo. Code Regs. § 1001-9, Pt. D, § I.V. (2021), https://drive.google.com/file/d/1sCtcjhaexDE0_KfvrFudgO0vMuYis_/view} and New Mexico\footnote{See New Mexico Environmental Improvement Board, Proposed N.M. Code R. § 20.2.50.122 (May 6, 2021), https://www.env.nm.gov/air-quality/wp-content/uploads/sites/2/2018/08/Proposed-Part-20.2.50-May-6-2021-Version.pdf} require (or have proposed) zero-emitting technologies.

While EDF commends EPA for its strong controller standards, it encourages EPA to adopt more protective standards for pneumatic pumps in its supplemental proposal. EDF would support standards that transition operators to zero-emitting solutions for these devices.

Right now, EPA has an unparalleled opportunity to lead the world in addressing climate change and seize on available, cost-effective solutions to achieve deep reductions in methane emissions and local air pollution in all communities across the country. Thank you for convening these important hearings and considering our views.