

Before the U.S. Environmental Protection Agency

Regarding

**Oil and Natural Gas Sector: New Source Performance Standards and National
Emission Standards for Hazardous Air Pollutant Reviews;
Proposed Rule**

Docket No. EPA-HQ-OAR-2010-0505

**Pittsburgh Public Hearing
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**Testimony of
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Good morning. My name is David McCabe. I'm an Atmospheric Scientist with the Clean Air Task Force. I appreciate the opportunity to speak with you today. Clean Air Task Force is a national nonprofit, environmental advocacy organization whose mission includes reducing the adverse health, environmental and climate impacts of air emissions from sources such as those found in the oil and gas industry. Our staff includes scientists, economists, business professionals, engineers, and attorneys.

The twin proposals from EPA to improve the outdated new source performance standards and national emission standards for hazardous air pollutants, to reduce emissions of volatile organic compounds and air toxics from the oil and natural gas industry, are absolutely necessary.

These proposals are a solid start at reducing VOC emissions from new and modified sources including natural gas wells, processing plants, and pipelines, as well as benzene and other air toxics from the oil and gas sector. EPA should strengthen and finalize these proposals promptly.

At present, almost all of the air pollution from the natural gas industry is unregulated—this industry is a large source of ozone smog-causing VOC emissions, and THE largest source of climate warming methane emissions in the nation. Most of this pollution occurs as the result of deliberate releases of gas into the air. Essentially, EPA's proposal simply requires the entire industry to adopt a number of best practices that are already in use by the best performers in the industry—for the most part the rule will simply require the industry to conserve gas that it is currently wasting by releasing into the air. As a result, the rule is very cost-effective, and it will save the industry money.

While we believe that EPA's proposal is a good start, the rule can be improved and must be improved. This can be accomplished primarily by requiring the use of additional industry best practices, as evidenced by EPA's Natural Gas STAR program and some state regulations, and by applying those best practices to the large inventory of existing equipment in the oil and gas industry. We will provide additional detail on our recommendations for improvement in the written comments we will file in October, but we want to briefly highlight three particular concerns here today.

First, EPA's NSPS proposal only reduces VOC emissions from some sources within the oil and gas sector, and doesn't go far enough in reducing emissions from existing wells, compressors, valves, and other sources. This equipment will stay in service for years or decades to come and will continue to wastefully and harmfully pollute, unless regulations require industry to clean it up.

Second, EPA must ensure that pollutants from gas flaring are not harming public health and welfare. Flaring is better than just dumping the gas into the air, but we don't know enough about the pollutants from flares at oil and gas wells. As today's NYT vividly reports, these flares are common in some locations, a terrible waste, and they can produce harmful pollutants.

Third, and this is extremely important, EPA does not propose to directly regulate methane emissions at all. Some methane reductions will occur as a co-benefit of the VOC controls EPA proposes, but directly regulating methane releases from new and existing sources could produce substantial additional reductions.

- Methane is a potent GHG. Natural gas systems are the single biggest source of methane in the US. Reducing methane emissions is one of the most

effective ways to rapidly reduce the rate of climate warming, and will help reduce background ozone, too. As EPA's proposal shows, these reductions can be very cost-effective.

- EPA's proposed rule will reduce methane emissions from oil and gas by about a quarter, but EPA's failure to regulate methane from this sector means that releases from a number of methane-rich sources, particularly existing sources, will not be reduced.

- EPA is legally obligated to regulate methane emissions from source categories listed under section 111 of the Clean Air Act, including the oil and gas sector, and we urge EPA to explicitly regulate methane emissions when it finalizes its NSPS proposal.

In conclusion, we welcome EPA's proposals to update its outdated regulations of air emissions from the oil and gas sector, but the proposals need to be strengthened. Furthermore, we urge EPA to finalize an improved rule without further delay by February next year.

Finally, we note that while we hope that industry will cooperate with EPA to better understand how much gas is leaking and being deliberately released, and from what equipment, the lack of perfect information about emissions is no reason to delay adoption of these common-sense, cost-effective rules.

Thank you for the opportunity to provide these comments.