United States Senate

WASHINGTON, DC 20510

November 30, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Dear Administrator Regan:

We write in support of the Environmental Protection Agency's (EPA) ongoing efforts to cut harmful methane pollution from the oil and gas sector. The agency's actions will support cost-effective and common-sense methane reductions, which will help protect people and the climate while advancing energy security and avoiding waste.

As EPA modernizes methane reporting under its Greenhouse Gas Reporting Program (GHGRP), we urge the agency to incorporate further use of top-down data and data from advanced measurement technologies, and to expeditiously finalize this rule. The State of Colorado, which has led the nation on rules to limit methane from oil and gas operations, is undertaking similar efforts.

Source-level data has been found to systematically underreport total emissions across the oil and gas supply chain.[1] While EPA's proposed empirically-based calculation methodologies for individual sources will improve the quality of emission estimates for those sources, methods currently in development to incorporate top-down data at the regional and site level promise to provide more accurate total emission estimates. Incorporating top-down data should not be limited to the detection and quantification of high-emitting point sources.

As emissions change over time, empirically-based, accurate reporting can ensure these changes are reflected in subpart W reporting. EPA's proposed rule incorporates both required and optional measurement methods for many sources, which will produce more empirically-based data. However, EPA should continue to assess the strength of its reporting requirements by incorporating top-down data collected through satellite, aerial, tower measurements, and other observational methods that ensure completeness across all sources of emissions.

Once the improvements in the subpart W proposal have been implemented, EPA should compare the reported emissions to the top-down measurements and use that assessment's results to guide future improvements to subpart W reporting. Top-down data at the regional level and site level

[1] See, e.g., Alvarez et al., Assessment of Methane Emissions from the U.S. Oil and Gas Supply Chain, 361 Science 186, (2018), https://science.sciencemag.org/content/361/6398/186; Brandt et al., Methane Leaks from Natural Gas Systems Follow Extreme Distributions (2016), https://pubs.acs.org/doi/10.1021/acs.est.6b04303; Zavala-Araiza et al., Toward a Functional Definition of Methane Super-Emitters: Application to Natural Gas Production Sites, 49 Env. Sci. Tech. 8167 (2015), https://pubs.acs.org/doi/pdf/10.1021/acs.est.5b00133.

can also be used to accurately estimate annual emissions for populations of sites, ensuring emissions from all sources are captured in totals.

We commend EPA for its efforts to drive down methane pollution. As EPA works to finalize methane reporting requirements under the GHGRP, we urge EPA to harness advanced technology capabilities, and to continue coordinating across regulatory programs and with the State of Colorado as it pursues similar efforts.

We look forward to hearing from you on this important matter.

Sincerely,

John Hickenlooper
United States Senator

Michael F. Bennet
United States Senator