



January 31, 2022

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2021-0317
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Email: a-and-r-docket@epa.gov

RE: Public Land Solutions Comments to Environmental Protection Agency Proposed Methane Rule, Docket ID No. EPA-HQ-OAR-2021-0317

Public Land Solutions (PLS) provides these comments to the U.S. Environmental Protection Agency's (EPA) proposed rulemaking that seeks to significantly reduce methane pollution from the oil and natural gas industry ("EPA Methane Rule"). The EPA's proposed Methane Rule would, as authorized by the Clean Air Act, lead to significant, cost-effective reductions in methane emissions and other air pollutants that endanger public health and otherwise cause damage to local communities. The proposed EPA Methane Rule would expand and strengthen existing emissions reduction requirements for new, modified and reconstructed sources in the oil and natural gas industry and would require states to reduce methane emissions from hundreds of thousands of existing sources nationwide. The proposed rule would also encourage the use of innovative methane detection technologies and other cutting-edge solutions. PLS supports this rulemaking because it will bring much needed and long-overdue safeguards to many communities seeking to transition from a reliance on the oil and gas industry and move towards diversifying their economies using healthy natural landscapes as an economic driver.

Public Land Solutions

Public Land Solutions is a non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land solutions. We have been involved at the local, regional and national level during many planning and permitting proposals related to oil and gas leasing, however our primary focus is the protection and enhancement of recreation assets and opportunities to develop durable and robust recreation economies. Our advocacy efforts to protect and enhance recreation assets on public lands include organizing stakeholder workshops, providing detailed comments and proposed maps during comment periods, delivering presentations to local and state governments, and communicating with a wide range of interested stakeholders.

Methane Pollution Harms Outdoor Recreation and the Outdoor Economy

Climate change uniquely [affects outdoor recreation](#), fundamentally changing public land use patterns and stunting economic opportunities. Whether you are a hiker, fisherman, mountain biker, snowboarder, climber or scuba diver, [climate change is affecting the terrain that Americans currently enjoy](#). The [evidence](#) of climate change is overwhelming: 16 of the hottest years on record took place between 2000

and 2017, and the 9 most devastating wildfires in American history took place after the year 2000. According to the United Nations' climate science body, methane is responsible for 30%¹ of the climate change we are experiencing today, and oil and gas is the largest industrial source of methane pollution, accounting for a third of methane emissions.

Methane leaking and flaring [harms outdoor recreation](#). In 2019 Congress has held a hearing on the effects of climate change on outdoor recreation, where the Outdoor Alliance testified to the many harms inflicted on the quality of the outdoor recreation experience; health impacts and safety concerns for recreationists; and damage to the outdoor recreation economy.² Climate change wreaks havoc on the outdoor recreation industry from less snowpack, longer and more intense wildfire seasons, water insecurity such as low river flows, basic access lost to public lands during fire season (year-round now in some places), and many other detrimental impacts. The \$689 billion outdoor industry³ brings millions of jobs to communities across the country in many ways. Recreation visitors bring needed dollars to cities and towns that have recreation assets like rivers, trails, and other outdoor spaces where fishing, hunting, boating, hiking, skiing, biking, climbing and a long list of other outdoor activities take place. Outdoor recreation companies, both large and small, are choosing to locate in these communities because our employees want to live in places with access to the great outdoors. Across the country, communities that have previously depended primarily upon resource extraction have begun to diversify their economies into the recreation sector. By promulgating this proposed Methane Rule—along with implementing best practices and using newly developed technologies—we can improve air quality in oil fields across the country, create jobs that can never be exported overseas, bring needed royalty revenue to county budgets, and support the growing recreation industry in the communities that need it the most.

The oil and gas industry is one of the largest sources of methane pollution in the US, and studies show that reducing oil and gas methane is the easiest and most effective action we can take to address climate change. Indeed, according to the [International Energy Agency](#), we can eliminate half of global oil and gas methane emissions at no net cost. Across the country we are seeing that healthy public lands lead to healthy economies. Many companies in the oil and gas industry support a strong Methane Rule,⁴ and have developed improved ways to trap fugitive gas emissions during both drilling and the life of the well pad. We understand the need for energy production, but it is time to acknowledge the cost of methane pollution to local communities. Allowing oil and gas operators to use old technology will damage air quality and prohibit communities from diversifying their economies. A win-win solution is available by finalizing this rule and requiring operators to use best practices to protect air quality and the outdoor recreation economy.

EPA's Proposed Methane Regulation Would Protect Outdoor Recreation and the Outdoor Economy

The proposal represents an important step forward in addressing the harms of methane pollution from oil and gas operations. EPA's Proposed Rule would cut methane and other harmful pollutants from new and existing oil and gas operations. The rule will reduce 74 percent of emissions by 2030—from methane

¹ See <https://www.eenews.net/articles/methane-rule-to-eclipse-past-regulations-including-obamas/>

² See testimony from the Outdoor Alliance [here](#).

³ See <https://outdoorindustry.org/advocacy/>

⁴ See <https://www.reuters.com/business/environment/us-unveils-crackdown-methane-starting-with-oil-gas-rules-2021-11-02/>, https://www.bp.com/en_us/united-states/home/news/press-releases/bp-statement-on-proposed-methane-rules.html

sources covered under the rule—as compared to 2005 levels. The proposal will cut methane emissions from leaks at oil and gas wells currently operating across the country, bringing nearly one million older, pre-existing oil and gas wells under federal oversight. The EPA proposal would utilize proven, cost effective, zero-emitting technology to the field, require that community voices are heard throughout the implementation process, and strengthen requirements for screenings and inspections. Additionally, the proposal will cut methane emissions from equipment that takes gas to markets like pipelines and storage equipment. PLS enthusiastically supports these much-needed efforts to address harmful methane pollution. Although the EPA’s Methane Rule is a strong step to curbing methane emissions, there are gaps in the proposal that need to be corrected in the final rule or the expected supplemental rule.

EPA Should Strengthen Its Proposed Methane Rule

While this proposed rule is a great start, it can be improved by ending the wasteful and dangerous practice of routine flaring at oil and gas facilities, as states like Colorado and New Mexico have done already. Routine flaring burns natural gas as a waste product, emitting a host of climate and health-harming pollutants. Routine flaring should only be allowed in emergency situations. In addition, EPA’s Methane Rule should require regular monitoring at all smaller, high-polluting and leak-prone wells, and work to incorporate emission monitoring results generated by community groups and other third parties to help address major leaks. Cleaning up oil and gas methane pollution is critical for improving air quality, protecting public health, and ensuring that communities across the country retain the opportunity to diversify their economies and pursue economic benefits that result from protected landscapes and the outdoor economy.

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Public Land Solutions applauds the EPA’s draft rule and urges the agency to set even stronger standards, eliminate loopholes for smaller operations, and end venting and flaring from oil and gas facilities. Finally, EPA should finalize this methane rulemaking as quickly as possible as climate change is an emergency, and our planet cannot afford further delay. By acting quickly, EPA can eliminate 16 million metric tons of climate pollution each year, simply by adopting new rules to how we monitor and control methane emissions. Please feel free to contact me with any questions or comments at jason@publiclandsolutions.org.

Sincerely,



Jason Keith
Managing Director
Public Land Solutions