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December 9, 2014

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

Dear Administrator McCarthy,

On behalf of the National Tribal Air Association, I am writing to express support for efforts to regulate methane pollution from the rapidly expanding oil and natural gas industry. As you know, methane is an extremely potent greenhouse gas (GHG), over 20 times more potent than the predominant GHG, carbon dioxide. The oil and natural gas industry alone emits more than 7.7 million tons¹ of methane into our air each year. Requiring the oil and gas industry to cut methane pollution by at least half within the next five years would save billions of dollars' worth of fuel¹, put the U.S. on track to following through with the Administration's commitment to reduce greenhouse gas emissions 17% from 2005 levels by 2020, and improve air quality. We strongly urge EPA to act quickly on regulation of methane from the oil and natural gas sector, both for the health of the planet and the preservation of our diverse indigenous cultures.

The NTAA is an autonomous organization with 86 principal member Tribes. NTAA's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of Indian Tribes. As such, the NTAA uses its resources to support the efforts of all federally recognized Tribes in protecting and improving the air quality within their respective jurisdictions. Although the NTAA always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the NTAA may not be agreed upon by all Tribes.

Tribes and Tribal communities are among those most severely impacted by climate change². Subsistence harvesting practices of Tribes are being rapidly altered due to changes in the migratory patterns and locations of animals and traditional plants, for example. Unlike many global warming challenges that are technically difficult and expensive to solve, controlling methane emissions from oil and gas operations simply requires the application of cost-effective maintenance requirements and existing pollution control technologies. Many of the available technologies capture gas that would otherwise be wasted, resulting in cost savings for producers. Recognizing this benefit, some companies have taken steps to adopt best practices for methane pollution control. A recent report from

k Force (2014). Waste Not: Common Sense Ways to Reduce Methane Pollution from the Oil and Natural Gas www.catf.us/resources/publications/view/206.
ange Research Program (2014). National Climate Assessment, Indigenous Peoples, Lands, and Resources. globalchange.gov/report/sectors/indigenous-peoples.

EPA's Office of Inspector General³, however, underscores that voluntary measures cannot be relied on exclusively to provide adequate protection from this this potent GHG, which is actively altering our climate system. While some states like Colorado and Wyoming have taken action to reduce methane emissions from the oil and natural gas sector, no national standards are in place to protect communities across the country from continued unpredictable changes to the global climate system.

Throughout the natural gas and oil development cycle, hazardous air pollutants and volatile organic compounds (VOCs) are co-emitted along with methane. The NTAA is deeply concerned about the effects of these pollutants on the health of Tribal communities. Toxic air pollutants, such as benzene, toluene, ethylbenzene, xylenes, and n-hexane⁴, are linked to numerous human health hazards including cancer, reproductive, developmental, and neurological damage. Similarly, VOCs contribute to smog formation, which can lead to childhood asthma attacks, and even premature death. To this end, the air quality impacts of natural gas flaring are very troubling to our members. Flaring wastes natural gas, produces air, light, and noise pollution, and contributes to climate change through the release of GHGs. Fortunately, there are practical alternatives to utilize natural gas from oil wells cost-effectively. In many cases, pipelines can be built to economically transport gas, and in other cases, gas can be used on site for power generation, compressed to fuel trucks or for transport, or can be chemically transformed into other useful liquids, such as methanol, which are easier to move. We encourage EPA to require that natural gas produced in association with oil wells be captured and either productively used on site or transported to market, as opposed to being vented or flared.

In light of the serious climate and health threats posed by air pollution from the oil and gas industry inefficiencies and the availability of practical and attainable solutions, we respectfully call on you to swiftly issue protective national standards directly aimed at cutting methane emissions from oil and gas operations. The EPA has clear authority under the Clean Air Act to develop smart and reasonable methane standards for this industry that will help protect the health and welfare of Tribes. We thank you for your continued leadership to protect our climate and our health, and we look forward to working with you as regulations are developed as part of the White House Strategy to Cut Methane Emissions.

Sincerely,



Bill Thompson
Chairman
National Tribal Air Association

CC:
The Honorable Janet McCabe
Acting Assistant Administrator, Office of Air and Radiation

³ US EPA (2014). Improvements Needed in EPA Efforts To Address Methane Emissions From Natural Gas Distribution Pipelines. <http://www.epa.gov/oig/reports/2014/20140725-14-P-0324.pdf>

⁴ Outdoor Air - Industry, Business, and Home: Oil and Natural Gas Production - Additional Information. http://www.epa.gov/oaqps001/community/details/oil-gas_addl_info.html