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EPA Region 8 Office

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Public Hearing Testimony

EPA Methane Rollback Hearing

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Good Morning. My name is Alexandra Merlino. I’ve traveled here today from Santa Fe, New Mexico on behalf of the Partnership for Responsible Business and our business partners throughout the state. I’m here to speak out in opposition to Donald Trump’s and Environmental Protection Agency (EPA) Acting Administrator Andrew Wheeler’s proposed rollback of the EPA’s New Source Performance Standards, pollution limits that protect Americans from harmful methane pollution.

EPA’s proposed rollback of New Source Performance Standards (NSPS) for the oil and gas industry is the wrong direction to take in protecting the environment and public health of our communities. This proposed rollback will hurt the communities where these developments exist and blatantly ignores the EPA’s responsibility to protect the health and safety of American families. This proposed rollback puts the interests of corporations ahead of those of the American people. It also represents the first step in Trump and Wheeler’s plan to eliminate a methane rule that even industry says it can live with and that has been in force for almost a year without adverse economic impacts.

Methane also poses a great danger to our planet. We know that methane’s warming power is 80 times more than carbon dioxide, making methane a dangerous driver of climate change. When something is 80 times more harmful, we don’t take a wait-and-see approach. Instead, we should take swift and deliberate action to reduce the harm - especially when this issue has been so widely discussed, researched, and found to be a significant source of emission that is extremely harmful to our climate and public health. We need climate action today, instead Trump and Wheeler are moving in the opposite direction.

I live in a state where the EPA’s rule is our only backstop to addressing methane emissions. New Mexico does not have state regulations on methane, we New Mexicans look to EPA to help set the baseline and provide a roadmap.

We’ve seen how strong methane rules that are being met in other states, like Colorado, where Oil and Gas Companies have implemented measures for leak detection and repair to meet the standards. **Did this affect their core business? NO it did not.** In fact, Colorado's crude oil production quadrupled from 2010 to 2015 and Colorado is among the major natural gas-producing states in the nation.

Leading oil and gas producers, such as ExxonMobil and their subsidiary XTO, say they want to move forward on efforts to reduce methane pollution. This is a quote from the sustainability report on their website, “ExxonMobil is committed to doing our part to contribute to cleaner air in the communities where we operate by reducing our air emissions. We are working to reduce air emissions associated with our projects, operations and the products we deliver through numerous initiatives, including major capital investments, implementation of cost-effective new technologies and adoption of creative new operating practices. In some cases, these reductions are driven by regulations.”

I want to repeat that last sentence, “In some cases, these reductions are driven by regulations.” It’s no wonder then why ExxonMobil and other forward-looking companies have not spoken up in support of these rules, nor have they asked their trade associations like the American Petroleum Institute to stop supporting these senseless rollbacks.

The ExxonMobil website goes on to say that over the past 10 years their release of VOC’s, sulfur dioxide and nitrogen oxides have decreased by almost 31% across all their businesses, and that new air measurement technologies are making it easier to monitor ambient air at their Downstream facilities, and that they are making this data publicly available to local communities. This is great for improving the health of local communities and ExxonMobil should be proud, and it’s hard for us to know which of these achievements were driven by regulations.

So while a select few Oil and Gas Companies are meeting these challenges and accepting these regulations as a core practice of being a responsible business, the fact that they are not speaking up reiterates that the regulations drive innovation and that we cannot rely on self-regulation from an industry that consistently puts profits ahead of the health of the American people and the environment.

Today, we are considering proposed rollbacks that would:

* Halt innovation
* Put our communities and vulnerable populations at further risk from the dangers of methane emissions; and
* Turn a blind-eye to an air emission that accelerates climate impacts, not mitigate them.

But sometimes showing and knowing the dangers of something isn’t enough to curb our appetite from it. Sometimes it takes a set of catastrophic events before we regulate to address those dangers. We knew that putting speed limits on our roads and highways would place our population in less dangerous situations. And it worked. We don’t have the luxury of driving as fast as we can because we know it’s unsafe…not just to us…but to the people around us. This is what this methane rule is to me. It says that we have to keep measures in place to mitigate the speed by which dangerous emissions are being released into the environment. When something is 80 times more potent to our environment…that’s like driving 80 miles per our in a residential community. We can’t wait until something catastrophic happens until it jars us to regulate it more responsibly. We know the dangers and impacts of methane already, we must say NO to this misguided rollback and keep the methane rules strong and intact.

Thank you for your time.

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