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U.S. Environmental Protection Agency
Attention Docket ID Number EPA-HQ-OAR-2010-0505
1200 Pennsylvania Ave., NW
Washington, DC 20460

Testimony of the BlueGreen Alliance for EPA-HQ-OAR-2010-0505

My name is Khari Mosley and I am the Regional Program Manager for Pennsylvania for the BlueGreen Alliance. I am here today to testify in favor of strong standards to reduce methane emissions from the energy sector.

The BlueGreen Alliance supports these standards and urges the administration to move forward with them and other efforts to reduce methane emissions. Union members are at the forefront of advancing safety, training, and quality throughout the natural gas sector. Improved technology and practices to reduce natural gas leaks will improve safety, and union leadership on safety and training will result in natural gas systems that produce fewer emissions. Unionized workers operate, monitor, repair and modernize our nation's natural gas facilities. These methane standards are vital to reducing leaks and releases that can endanger them.

While the nation's energy sector has made significant strides to increase the efficiency of our natural gas systems in recent years, leaking methane continues to harm the economy and the environment. The energy sector leaks dangerous and wasteful industrial pollution like methane, benzene and other dangerous pollutants into our air from oil and natural gas wells, pipelines, tanks and other equipment. These can be due to accidental releases, but often are due to outmoded practices and obsolete technology. This lost and leaking natural gas costs billions of dollars every year—and nationwide these upstream activities waste the amount of gas it takes to heat nearly 6 million homes.

The energy sector is rapidly expanding without important public health and environmental protections, and urgent action is needed. Proven, low-cost technologies are already commercially available to cut methane emissions from the oil and gas sector by 50 percent in the next five years. Without enforceable standards, energy companies have little incentive to improve operations and reduce methane emissions by keeping gas in the system, despite the availability and cost-effectiveness of mitigation technology.

States are already taking note of the need to rein in these emissions. Last year Colorado enacted policies that reduce methane emissions across these activities even as the state's energy sector expands. Many more states could build on this example. But while it is a good thing that states are starting to move ahead when it comes to stronger regulation of energy sector methane emissions further upstream—such as in extraction, storage, and transmission—we also need strong federal standards.

It is also vital to reduce these emissions to protect our environment and communities. Pound for pound, atmospheric methane is orders of magnitude more potent than carbon dioxide and is the second largest contributor to climate change (estimated at 10 percent of total US greenhouse gas

emissions). The administration is doing the right thing proposing standards to limit emissions, designed to help reach an economy-wide 45 percent reduction goal by 2025. Strong methane policies will equip utilities, workers and communities with the necessary tools and technology to keep natural gas in the system.

But more can and should be done.

While these proposed standards are a leap ahead in attaining this 10 year, up to 45 percent methane reduction goal, we hope the EPA embraces other critical approaches to reduce unnecessary natural gas leaks, such as at existing methane-emitting facilities—and especially in the distribution pipelines underneath our cities carrying natural gas to individual homes and businesses. Neither of these crucial sectors is included in this EPA proposal.

While EPA did introduce voluntary guidelines for distribution pipelines—the pipes carrying gas to customers at the city and community level—in their Natural Gas STAR Challenge to industry, voluntary measures are not enough to fix the leaking pipes underneath our cities in a reasonable timeframe.

Strong national methane standards are a win for our economy and environment. The BlueGreen Alliance thanks the EPA and the administration for their efforts to curb methane emissions. Doing so is both vital to addressing climate change and creating good jobs for American workers.

Thank you.

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