United States Senate
WASHINGTON, DC 20510

February 9, 2024

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Administrator Regan,

New monitoring technology, including methane satellites, has given us a better understanding about the emission profile of oil and gas drilling. Congress recognized this in the *Inflation Reduction Act* (IRA) when it included the Methane Emissions Reduction Program (MERP). We urge you to dedicate a significant portion of the funds, at a minimum $200 million of the $850 million that Congress already provided for methane emissions detection and monitoring, to independent and verified third parties, including state and federal agencies, instead of to oil and gas producers, to improve tracking of emissions, enforcement, and the accuracy of the Greenhouse Gas Reporting Program (GHGRP).

In order to meet our climate goals, it is essential that methane emissions be reduced. Methane is an extremely potent greenhouse gas (GHG), over 80 times more potent than carbon dioxide across a 20 year period.[1] Proponents of fossil gas, which is comprised mostly of methane, argue that it is better for the environment than other fossil fuels, such as coal, due to the emissions from its end-use combustion. However, that doesn't account for methane leakage that comes from gas and oil operations. The Environmental Protection Agency (EPA) uses 1.4% as the methane leakage rate, but a study of the Permian Basin in New Mexico estimated a leakage rate of over 9%.[2] Other studies have found that from 2012-2018, methane leakage across the US was 60% higher than EPA's figures.[3] Addressing methane emissions can result in bigger reductions at lower costs, but funding is essential to ensure we can measure progress and identify problems quickly.

The MERP is an important opportunity for the EPA to significantly impact methane emission reductions. However, these programs will not meet their full potential if we allow under-reported emissions and un-verified self-reporting, or non-independent certification processes. These risks are increased if we do not provide robust federal funding that can leverage transparent, empirical emissions monitoring.

The EPA has $850 million of MERP implementation funding through 2028, and a significant portion should be allocated in the form of competitive grants for enhanced, independent, and verified third-party methane monitoring, including remote-sensing of US oil and gas operations. If done accurately, monitoring can precisely identify high-emitting facilities to support rapid operator notification, help improve and validate emission factors, and ensure transparent publication of emissions data. Funding such a program would also help support states looking to

[1] https://rmi.org/reality-check-natural-gas-true-climate-risk/
[2] https://news.stanford.edu/2022/03/24/methane-leaks-much-worse-estimates-fix-available/
[3] https://www.edf.org/climate/methane-studies

build out monitoring efforts to address high-emission events through their state implementation plans.

Enhanced methane emissions monitoring provides a critical backstop to self-reporting by oil and gas companies which is otherwise unverified by independent parties. Oil and gas companies are underreporting their methane leaks or using non-independent certifiers, and the EPA cannot rely on their self-reporting. Enhanced methane emissions monitoring would provide increased transparency and independence that can advance improvements in GHG reporting and inventories, while contributing to the success of the MERP. Additionally, it can help enable key international programs and lay the foundation for emission reductions in other key sectors such as landfill methane emissions.

This Administration has taken significant steps towards GHG reduction in our country. We urge you to use a significant portion of the MERP funding for enhanced, independent, and verified third party methane emissions monitoring to help reduce potent GHGs and helping us meet our climate goals.

Sincerely,

Jeffrey A. Merkley
United States Senator

Sheldon Whitehouse
United States Senator

Bernard Sanders
United States Senator

Edward J. Markey
United States Senator

Peter Welch
United States Senator

Cory A. Booker
United States Senator