

**July 14, 2020**

**E.P.A. Methane Rollback at O.M.B.**

***Regulation Identification Numbers***

*Methane and Transmission & Storage Rescission: 2060-AT90*

*Technical Leak Detection and Repair Changes: 2060-AT54*

**Speakers:**

**Heather Manuel**

A mother of two young boys, who deserve clean air

E2 Member

Director of Corporate Communication, Gevo, Inc

I work for Gevo, a company addressing the market need and desire to reduce greenhouse gas emissions with sustainable alternatives to fossil-based fuels. We are commercializing the next generation of renewable premium gasoline, jet fuel, and diesel fuel with the potential to achieve zero carbon emissions and low or no particulates. We use low-carbon renewable resource-based carbohydrates as raw materials, and we are in an advanced state of developing renewable electricity by the installation of two wind turbines and renewable natural gas for use in production processes.

For Gevo, adhering to the current methane rule is considered a cost of business. It is a vital practice for the safety of our environment, our employees, and the people living around our facility in Luverne, MN. It is the right thing to do, and we will continue to reduce GHGs by any means possible. But not all will without regulation.

This proposed methane rollback would help drive dangerous climate change and have an impact on public health. We need to be moving towards a clean and green economy, not away from it.

We urge the E.P.A. to retain the main features of the existing methane rule and not move forward with the rollback. A rollback is not only bad for the environment but bad for business.

- The federal methane rules were patterned after Colorado's methane rules, developed in partnership by the environmental community and fossil fuel industry. These rules incorporated widely accepted best industry practices that could be implemented in short order if there was a consistent and predictable federal policy. The rules include:
  - **Improving leak detection and repair requirements**: Require quarterly inspections to prevent leaks and vigorous enforcement across the board;

- **Better regulating all aspects of production**: Strengthen the control measures and monitoring requirements. Ensure operators are using the best technologies such as pumps and controls that prevent most or all loss of methane;
- **Although this does not pertain to Gevo, it is important to Improve flaring regulation**: Toughen efforts to cut flaring by increasing limits and tightening exemptions;
- **Proper enforcement**: Increase the enforcement and reporting of oil and gas development to ensure waste is being minimized.
- 
- Some of the most prominent industry leaders such as [B.P.](#), [Exxon Mobil](#), [Shell](#), and [Equinor](#) have publicly opposed this rollback.
- Methane is the main component of natural gas. Emitting it into the atmosphere **wasted \$2 billion (from 2013 – 2019)** of taxpayer-owned resources, shortchanging taxpayers and the states 300 million dollars of revenue per year, through royalties owed to the American public – revenue that local governments could use in the pandemic.
- According to the International Energy Agency, we can eliminate half of global oil and gas methane emissions at no net cost.
- Companies say regs are needed to secure the industry’s license to operate
- Even oil and gas investors are demanding methane action.
  - B.P. recently said “voluntary actions by several energy companies are not enough to solve the problem.”
- Without methane standards, methane levels are expected to plateau or rise, as years of E.P.A. data has indicated.

**Please put a stop to this rollback.**

**Respectfully,**

**Heather Manuel**

- The mother of two young boys who deserve a better Earth
- Director of Communications, Gevo, Inc