

Mr. Ryan Steadley
Executive Director
STRONGER
Via email: steadley@strongerinc.org

Re: Comments on update to STRONGER's Air Quality Guidelines

February 5, 2019

Dear Mr. Steadley:

As representatives of conservation, clean business and environmental groups from across the nation, we write to voice our strong support for the inclusion of methane emissions in the [latest update](#) to STRONGER's Air Quality Guidelines.

STRONGER's mission is to "enhance protection of human health and the environment by educating and providing services for the continuous improvement of state oil and gas environmental regulatory programs," and STRONGER's guidelines are "intended to guide states in assessing and improving their regulatory programs." As such, we feel that covering methane in these guidelines is wholly appropriate, as it recognizes the substantial and growing status of methane regulation among leading oil and gas producing states.

Beginning in 2014 in Colorado, leading oil and gas states across the nation, such as California and Pennsylvania, have established programs to reduce methane emissions from oil and gas development, and a number of other states, including New Mexico and Virginia, have announced plans to adopt similar programs. Including methane in the STRONGER air quality guidelines will help recognize states that have acted to curb emissions of this harmful pollutant, foster continuous improvement in their regulatory systems governing methane, and encourage other states to join them in addressing this important issue.

A recent study published in the journal [Science](#) found that the U.S. oil and gas industry emits 13 million metric tons of methane from its operations each year—nearly 60 percent more than currently estimated by the EPA. And with more than 80 times the warming power of carbon dioxide in the short term, methane is a major driver of climate change.

Leading states and oil and gas producers are stepping up to address the pressing problem of methane pollution and we strongly support these inclusion of methane in the updated STRONGER Air Quality Guidelines.

Sincerely,

Albuquerque Sustainable Business
Breathe Utah
CA/VU - Climate Advocates/Voces Unidas

Clean Air Council
Clean Air Task Force
Clean Water Action

Conservation Voters New Mexico
Devil's Spring Ranch
Earthworks
Environmental Defense Fund
Evangelical Environmental Network
Moms Clean Air Force
Mormon Environmental Stewardship
Alliance
National Parks Conservation Association
Natural Resources Defense Council
Nature Abounds
New Mexico Horse Council
New Mexico Interfaith Power and Light
New Mexico Sportsmen
Ohio Environmental Council
Partnership for Responsible Business
Santa Fe Green Chamber of Commerce
Sierra Club
The Wilderness Society
Western Colorado Alliance
Western Environmental Law Center
Western Leaders Network
Western Organization of Resource Councils
Wyoming Outdoor Council