



Vet Voice Foundation
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February 21, 2023

The Honorable Joseph R. Biden, Jr.
President of the United States
The White House
1600 Pennsylvania Avenue Northwest
Washington, DC 20500

CC: White House Climate Advisor Ali Zaidi, EPA Administrator Michael Regan, Interior Secretary Deb Haaland, BLM Director Tracy Stone-Manning

Dear Mr. President,

The war that is currently being perpetrated by Vladimir Putin in Ukraine is horrific and we support Ukraine and its people as they continue to fight to defend their country and autonomy. We also acknowledge that Europe's dependence on Russian gas is presenting understandable challenges for the EU, world markets, and the Biden Administration. During this tumultuous period, it is imperative that the Administration provide stability by maintaining its international and domestic priorities. Today, we write to ask that your Administration do so by continuing to protect the climate and public health.

In light of recent calls to increase domestic production of oil and gas in response to Russia's war on Ukraine and EU energy needs, we write to urge the Administration to intensify efforts to limit the ongoing and widespread waste of domestic energy resources during oil and gas production from methane venting, flaring and leakage. Eliminating routine venting and flaring and reducing methane leaks will further enhance long-term U.S. security by maintaining alignment with climate targets, while simultaneously protecting local communities from other harmful pollution. We call upon you to ensure that the Environmental Protection Agency (EPA) and Bureau of Land Management (BLM) (1) quickly promulgate strong rules to reduce energy waste and methane emissions at oil and gas sites and end the grossly wasteful practice of routine venting and flaring of associated gas, and (2) increase monitoring of health-harming pollutants and take other immediate actions to protect frontline communities in the interim.

Fortunately, reducing methane waste and pollution aligns with current U.S. foreign policy objectives, and there are widespread and cost-effective solutions available to achieve such reductions. Indeed, the amount of gas wasted from leaks, venting and flaring in the United States

could provide the EU with 21%-26% of the imported gas it normally imports from Russia¹ while saving the U.S. economy an estimated \$20 billion,² and the US has capacity to boost gas exports to Europe without signing new contracts or building new infrastructure.³ At a time of such crisis, the reckless leaking, venting and flaring of gas in U.S. oilfields could be seen as yet another choice by oil companies to put profits ahead of people.

The EPA and BLM are already in the process of proposing and adopting rules to curtail methane pollution and waste, respectively. The White House should direct these agencies to devote all necessary resources to develop and swiftly promulgate rules that increase energy security and are highly protective of public health by slashing leak rates and prohibiting routine venting and flaring.

The White House must direct its agencies now in order to protect communities on the frontlines of oil and gas production. When natural gas is wasted by being leaked, vented, or flared, harmful pollutants including ozone-forming volatile organic compounds (VOCs) and hazardous pollutants such as benzene and hydrogen sulfide also escape into the air. These pollutants already disproportionately and significantly harm public health in communities living near oil and gas production, including increasing risks of respiratory illnesses and cancer. Foreign policy actions that could potentially increase production must not lose sight of the effects on Americans, and they should include a strong domestic component to protect these communities from further harm.

In the interim, as the rulemakings proceed at both agencies, the Biden Administration should also take immediate actions to meet the urgent needs of communities who cannot wait for help. Specifically, the White House should direct EPA to work with States and Tribes to increase monitoring of methane, hazardous air pollutants, and ozone precursors in vulnerable communities near oil and gas sites, and to use all available authorities to respond to evidence of dangerously high exposure levels. The White House should also direct BLM to include a prohibition on starting up well production before wells are connected to a gathering system with available capacity in all new drilling permit approvals for oil wells with associated gas to ensure wells will not waste domestic energy resources by routinely venting or flaring.

¹ Calculation: $Numerator = \text{total wasted gas, which is the emissions range between EDF's Alvarez-predicted total (Alvarez: <https://www.science.org/doi/10.1126/science.aar7204>) and the TROPOMI total (<http://www.tropomi.eu/data-products/methane>) + total US flared volume from IEA$

$Denominator = \text{Total imported gas, which is 155 BCM (Source:}$

<https://www.iea.org/news/how-europe-can-cut-natural-gas-imports-from-russia-significantly-within-a-year>). To arrive at 21%-26%, EDF divided *total wasted gas volume by total imported gas volume for percentage range.*

²https://www.bakerinstitute.org/media/files/Research/8f765caa/CARBONFlaring_paper_Birnur_FINALwith_cover_secured.pdf ("the extent of the economic value of the wasted gas to flaring and venting can be approximated by its export value to the U.S. and European markets, which is estimated to be \$20 billion.").

³ Clark Williams Derry, Institute for Energy Economics and Financial Analysis, *The U.S. Can Increase LNG Exports to Europe: No New Contracts or Infrastructure are Required* (April 2022) (available at

http://ieefa.org/wp-content/uploads/2022/04/The-US-Can-Increase-LNG-Exports-to-Europe_April-2022.pdf?utm_campaign=LNG%20Campaign&utm_medium=email&_hsmi=209903102&_hsenc=p2ANqtz-_dlnt7Hm6Bt-WskrSGkAf7DC0bSy-lnKJ0ZyZ4yPo7OfN7E1KjUeG9hZpQcJ-73Gn1lietQarNGqZGUq95lHw-VDaKIp2duhS5BWr0x7XK2N2IBIO&utm_content=209903102&utm_source=hs_email); see also Erickson, Peter, *The US can provide Europe with LNG while advancing climate goals* (April 2022) (available at <https://www.sei.org/perspectives/us-europe-russia-lng-climate/>).



Acting now to reduce methane waste is also essential to addressing climate change and ensuring our nation's long-term security. Methane is a powerful climate forcer, more than 80 times more powerful than carbon dioxide at trapping heat over a 20-year timeframe. In fact, methane is responsible for more than a quarter of the planet's warming that we experience today. Recognizing this, the U.S. led the world to agree upon a Methane Pledge, and in a recent agreement with the European Commission, it promised to increase LNG exports to the EU while maintaining "alignment with climate objectives," including the reduction of methane emissions.⁴ The Biden Administration must ensure that important strategic actions taken in response to Russia's aggression do not undermine these climate goals, which are critical for long-term national security and global stability.

As Russia's war on Ukraine underscores the relationship between energy and foreign policy, it is critical that the United States continues to vigorously pursue our climate objectives and protect frontline communities impacted by oil and gas production at home. Actions to cut energy waste by ending routine venting and flaring, monitoring emissions, and expediting permanent protections will increase our energy security as well as honor the federal government's obligations to the American people, their health, and our shared planet during a critical and perilous time.

We appreciate your commitment to addressing these vital issues and your careful consideration of our recommendations.

Sincerely,

Secretary Ray Mabus, United States Department of the Navy
Lieutenant General Jeff Buchanan, USA (Ret)
Major General Paul Eaton, USA (Ret)
Major General Gale S. Pollock, USA, (Ret)
Major General Ralph Haynes, USA (Ret)
Rear Admiral Michael Baker, USN (Ret)
Rear Admiral Katharin Laughton, USN (Ret)
Rear Admiral Jamie Barnett, USN (Ret)
Brigadier General Steven M. Anderson, USA (Ret)
Brigadier General Stephen Cheney, USMC (Ret)
Brigadier General Mark Montjar, USA (Ret)
Brigadier General James D. Johnson, USA (Ret)
Assistant Surgeon General Bryan D. Hardin, USPHS (Ret)