Comments of Taxpayers for Common Sense
Hearing Regarding the Proposed Rule
"Additional Reconsideration Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review"
November 17, 2025

Good afternoon. My name is Mia Huang, policy analyst at Taxpayers for Common Sense, a nonpartisan budget watchdog that has worked since 1995 to ensure the government treats taxpayers fairly by confronting waste, exposing special-interest giveaways, and advocating for lasting fiscal responsibility.

Taxpayers for Common Sense strongly opposes the proposed rule, which would weaken methane waste safeguards, increase natural gas waste, and ultimately transfer costs and liabilities onto American taxpayers and consumers.

Methane is the main component of natural gas and a potent greenhouse gas, so when it's wasted not only do we lose a valuable resource we create costly liabilities as well. In 2024, EPA finalized a rule that would require oil and gas operators to find and repair leaks, restrict routine flaring, and establish a process for investigating unusually large methane releases. EPA has already delayed or loosened several requirements of the 2024 rule.

This proposed rule goes further, introducing three major policy changes that would substantially increase natural gas waste and associated costs for American taxpayers.

First, the proposed rule would eliminate the Super Emitter Program, which allows third parties using advanced technologies, like satellites, to detect and report massive methane releases exceeding 100 kilograms per hour. Without a requirement to respond to third-party reports, operators have less incentive to identify and stop these leaks, allowing enormous volumes of methane to escape without public knowledge.

Second, the proposed rule would drastically reduce monitoring requirements for marginal and conventional wells. Rather than relying on modern leak detection technology, the proposed rule would allow operators to conduct quarterly inspections using merely sound, sight, and smell. Studies have found that marginal wells account for 60% of production-site methane emissions. This change could allow leaks to go unnoticed and unrepaired for months.

Third, the proposed rule would allow operators to rely on flaring rather than capturing associated gas for sale. Flaring literally sets a valuable natural resource on fire. Removing

requirements to capture that gas would encourage the routine waste of a valuable domestic energy source.

EPA's own analysis projects these rollbacks would add 60 to 88 million short tons of methane emissions by 2050. This waste harms taxpayers in three ways.

First, it wastes a valuable domestic energy source. At a time when Americans need secure, affordable energy, burning or venting natural gas is fundamentally irresponsible. Over the last decade, 209 billion cubic feet of natural gas were lost on federal lands alone—enough to meet the annual energy needs of 8 million households.

Second, increased methane emissions contribute to climate change, driving extreme weather and associated disaster costs, including damaged infrastructure and recovery assistance. These costs fall heavily on taxpayers.

Third, it costs federal and state taxpayers important revenue. For example, our recent analysis found that natural gas lost on federal lands over the past decade cost taxpayers $70 million in potential royalties, revenue that could have been used for schools, hospitals, and other local priorities.

We cannot afford weakened methane standards that squander a domestic energy resource, increase long-term liabilities, and waste taxpayer resources and revenue. Taxpayers for Common Sense urges EPA to withdraw this proposed rollback. We look forward to submitting more detailed written comments.

Thank you for your time.