



# ENVIRONMENTAL LAW & POLICY CENTER

**Testimony in Support of EPA's Proposed Waste Emissions Charge**  
**Ann Mesnikoff, Federal Legislative Director, Environmental Law & Policy Center**  
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My name is Ann Mesnikoff. I am the Federal Legislative Director for the Environmental Law & Policy Center (ELPC). ELPC is the Midwest's leading public interest environmental and legal advocacy organization.

ELPC appreciates the opportunity to testify today in support of EPA's proposed Waste Emissions Charge.

Cutting methane emissions across the oil and gas industry is critical to addressing the climate crisis. The proposed Waste Emissions Charge, part of the overarching Methane Emissions Reduction Program, is a new tool in EPA's toolbox established in the historic Inflation Reduction Act, to achieve this important goal.

ELPC testified in support of EPA's rule under section 111 of the Clean Air Act and appreciates the role that important final rule will play. This new charge will help ensure action is taken at the largest sources in upstream oil and gas production and across the transportation and storage of methane.

The United Nations' Intergovernmental Panel on Climate Change reports make clear the causes of climate change, its devastating impacts, and the absolute urgency of action NOW.

January 2024 was the warmest January on record, and February 2023 through January 2024 was the warmest 12-month stretch on record.

Methane is a climate super-pollutant more than 80 times as powerful as carbon dioxide on a 20-year timescale. Tackling these large sources of methane will also have important health benefits because the methane emitted at oil and gas sites is mixed with health-harming pollutants like VOCs and benzene.

Climate change is already bringing havoc globally and we are seeing impacts across the Midwest and the Great Lakes region where ELPC works. Climate change threatens the Great Lakes ecosystem, fresh water supplies, and the economies that depend on them.

The changing climate brings increased storm intensity, changes to water temperatures, flooding, runoff, and algal growth—all presenting a significant and increasing threat to the Great Lakes.

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Changing weather patterns – heat, drought, flooding – impact agriculture. And, for my colleagues in Michigan with plans to enjoy winter activities in the Upper Peninsula – snow is scarce.

Approximately 4.5 million Americans across the Midwest, 3.3 million in Ohio alone, live within a half mile of oil and gas sites and/or equipment and toxic pollution they emit. It appears that from North Dakota to Ohio and Michigan communities will benefit from EPA’s implementation of this new charge.

Importantly, the Waste Emissions Charge is part of a larger program geared to helping sources of methane reduce waste and emissions overall, including the announcement from EPA and DOE regarding \$1 billion in funding to reduce methane. In addition, companies across the sector are pledging to limit their emissions below the threshold for the charge. Technologies are cost-effective and available to achieve low or zero-emissions in the sector.

EPA must do all it can to avert the worst impacts of the climate crisis by finalizing the strongest possible rule while ensuring effective implementation of the methane rule announced in December of 2023.

ELPC will submit comments to the docket and appreciates the opportunity to testify today.

Thank you.

Ann Mesnikoff  
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