



## ENVIRONMENTAL LAW & POLICY CENTER

Protecting the Midwest's Environment and Natural Heritage

October 17, 2017

E. Scott Pruitt  
Administrator  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 1101A  
Washington, DC 20460

RE: Notice of Intent to Sue for Failure to Promulgate Emission Guidelines for Methane and VOC Emissions from Existing Sources in the Oil and Gas Sector

Dear Administrator Pruitt:

On August 28, 2017, Environmental Defense Fund (EDF), Clean Air Task Force, Clean Air Council, Center for Biological Diversity, Earthworks, Environmental Integrity Project (EIP), Natural Resources Defense Council (NRDC), and Sierra Club sent you a notice of intent to sue the U.S. Environmental Protection Agency (EPA) for failure to perform its nondiscretionary duty under the Clean Air Act (CAA) to issue final emission guidelines limiting methane and volatile organic compound (VOC) emissions from existing sources in the oil and natural gas sector, and for unreasonable delay in carrying out that duty.

Environmental Law and Policy Center (ELPC) hereby joins the August 28 notice of intent to sue. As the notice explains, having issued methane and VOC new source performance standards (NSPS) for this industry under section 111(b) of the CAA, the EPA is obligated to issue emission guidelines for existing sources in this industry under section 111(d). EPA's failure to discharge that nondiscretionary duty violates the CAA and harms the health and welfare of ELPC's members.

Respectfully submitted,

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