



E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

October 24, 2011

Fellow Attorneys General:

I recently held a roundtable discussion with energy sector representatives to discuss regulatory issues of concern. One such issue was the U.S. Environmental Protection Agency's use of questionable science and data in estimating methane emissions from natural gas production. Based upon what I learned at that roundtable discussion, I reviewed the available data on the issue and concluded that the energy sector was absolutely justified in complaining about EPA's actions.

As a result, I have sent the attached letter to EPA Administrator Lisa Jackson, requesting additional information on the methodology employed by EPA, and suggesting to Administrator Jackson that EPA's methodology should be revisited and revised.

My concern is that EPA is employing its flawed methodology in order to rationalize new and unjustified federal regulations to solve a methane-emissions problem that simply does not exist. If EPA does so, the state's ability to self-regulate will have been eroded without justification.

I strongly encourage you to look into this matter in your own state and to talk with local energy producers and operators to see if they have the same concerns. Further, I ask you to consider sending your own letter to Administrator Jackson, to ensure the EPA is making regulatory decisions based on sound science and data, especially when those decisions directly affect state regulatory primacy.

Our office is glad to be of assistance to you in any way possible. Please contact Oklahoma Solicitor General, Patrick Wyrick at Patrick.Wyrick@oag.ok.gov or 405-521-3921.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Scott Pruitt".

E. Scott Pruitt
Attorney General