| From: | |
|----------|--|
| To: | GHGInventory |
| Subject: | EPA must maintain high-quality GHG emissions and sinks data and analysis |
| Date: | Tuesday, March 07, 2017 2:25:06 AM |

Dear EPA,

Thank you for your ongoing commitment to meeting UNFCCC treaty obligations for reporting and publishing annual GHG inventory reports. As an American living overseas, I'm proud the USA has been a leader in developing new and improved methodologies for estimating emissions and sinks that have gained acceptance at home and serve as a model overseas. GHG estimation methods and US GHG data is important for enabling global GHG emission management. If the quality of those data are compromised, it would cause enormous headaches later when much of the world moves to a CO2 emission "budget" regime, as proposed in IPCC assessment review V. It would be a nightmare if US data has to be adjusted in the future because quality issues such as tinkering, discrepancies, and gaps come to light that require "margins of safety" to be added to ensure US emissions remain on budget. Let's not move backwards now! The world is watching.

I'm especially concerned about fugitive methane leaks at the well head in hydraulic fracturing. As reduced emission completions (green completions) were phased in by the Obama administration in consultation with the American Petroleum Institute, I thought the industry had realized upholding this standard was in its best interest but the Trump administration seeks to roll them back at API's bequest. This would be a major setback and likely make the task of accounting for methane emissions from fracking even harder and uncertain.

Regards, Michael Horn

