

From: [Bob Hughes](#)
To: [GHGInventory](#)
Subject: Comment on Green House Gas Inventory [WARNING: SPF validation failed]
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I commend the Agency for compiling and reporting what appears to be a complex and fairly complete set of USA GHG data.

I agree with the importance of forests and grasslands as C sinks. And I agree that wood harvested for energy production should be treated as a C emission. I agree with using the FIA estimates of wood volume to arrive at national estimates of forest C, as well as the NRCS estimates of soil C for estimating grassland C. I also agree with the need to obtain accurate estimates of soil C status and trends for Alaska grasslands & wetlands. I believe there are large stores of C in those systems, and as they dry and warm they will release C.

I am unclear and concerned about the accuracy of the CH₄ estimates from the oil and gas industry. Unlike the USDA, industry reports suffer from both real and potential conflicts of interest. I am particularly concerned with unreported CH₄ leakage from fracked wells, rock, and water sources. In addition, I am concerned about inaccurate well counts, inaccurate well locations, and incomplete/faulty sealing of abandoned and inactive wells.

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