CONSUMER ACTION for a STRONG ECONOMY

POLICY BRIEF:

The Environmental Left's
SUSTAINED ASSAULT
ON AMERICAN OIL AND GAS

Executive Summary

- To anyone following the Biden Administration and congressional Democrats, **there is no doubt about their intent to bog down the U.S. oil and gas industry with damaging policies.**
- On day one of his presidency, **President Biden issued a flurry of executive orders unraveling the Trump Administration's America First energy agenda**, which enabled the United States to achieve energy independence for the first time in nearly 50 years.
- Meanwhile, Democrats are pushing a monstrous **$3.5 trillion "budget reconciliation" bill** that includes new taxes and restrictions on domestic oil and gas production.
- Radical climate activists, such as the environmental group **Ceres**, and Biden's EPA are trying to change the subject from the left's failed policies, crafting misleading reports criticizing oil and gas companies for their climate "crimes."
- As a compliant media obligingly covers their findings, Ceres and their allies conceal their ties and funding to rent-seeking corporations, radical left-wing foundations, and **even China's communist government.**
- Groups such as **Ceres** and **M.J. Bradley and Associates** (MJB&A) have employed the deceptive tactic of producing pointed research attacking fossil fuels with the intent and knowledge that sympathetic media outlets, such as the *New York Times* and others, will report these political agendas as unbiased "news" stories.
- Ceres has teamed up with MJB&A, a left-leaning group with a strident anti-fossil fuel agenda, to **produce misleading and biased reports** on the oil and gas industry's environmental record.
- Earlier this summer, **MJB&A released a "study" on the oil and gas industry**. Funded by Ceres, and the environmental group Clean Air Task Force, MJB&A presented its findings as an authoritative analysis of the industry's record on addressing methane emissions.
- ***The New York Times* relied on the report's findings. Yet a closer look shows that the "analysis" fails under closer inspection, collapsing once key facts about methane emissions from the oil and gas industry are properly explained**.

Introduction

To anyone following the Biden Administration and congressional Democrats, there is no doubt about their intent to bog down the U.S. oil and gas industry with damaging policies in order to bolster renewable and so-called "green" energy sources. And they are exploiting every legal, legislative, and financial tool to accomplish it.

On day one of his presidency, Joe Biden issued a flurry of executive orders unraveling the Trump Administration's America First energy agenda, which enabled the United States to achieve energy independence for the first time in nearly 50 years.[1]

Biden instructed the Environmental Protection Agency (EPA) to devise new regulations on the oil and gas industry, ostensibly aimed to control methane leaks, without any actual data to guide these policies (more on this below).

Meanwhile, in Congress, Democratic leaders are pushing a monstrous $3.5 trillion "budget reconciliation" bill that includes new taxes and restrictions on oil and gas production, a scheme to impose a national renewable electricity mandate that would lead to blackouts, higher energy prices for consumers, and billions of dollars of taxpayer-funded handouts to favored green industries.

In effect, the Democrats' bill is an extension of Rep. Alexandria Ocasio-Cortez's (D-NY) Green New Deal (GND), backed by over 100 House Democrats,[2] and which Joe Biden embraced, in substance, if not in rhetoric, during the 2020 presidential campaign.[3] The GND aims to eliminate fossil fuels in fewer than 10 years and institute what many would call an "enviro-socialist utopia" of windmills, solar panels, and general economic immiseration.

The consequences of the GND are now playing out in Europe. Over the last several weeks, after years of starving fossil fuel production through carbon taxes and regulations, the continent is panicking, thanks to natural gas prices soaring by over 400 percent, afflicting homeowners, manufacturers, and utility ratepayers.[4]

The consequences of the GND are now playing out in Europe.

This crisis, which could extend globally, including to the U.S., was precipitated by ideologically driven European governments deliberately intending to increase the price of fossil fuels.[5] "Europe's decarbonization agenda requires making fossil energy use more expensive," Martin Sandbu of the *Financial Times* recently wrote. "That was always going to be a tough sell. Now that higher prices are suddenly here, it is going to be harder still."

Europe's calamity is policy-driven and was thus entirely avoidable. Yet instead of heeding the warnings from across the Atlantic, the Biden Administration and green activists allied with their policy objectives are adamantly treading down the same failed path. Along the way, they are engaging in an active campaign designed to damage the reputation the reputation of the fossil fuel industry and its more than 1 million employees, pointing to bogus reports drafted by self-claimed experts, who are in fact idealogues in what economist Stephen Moore calls the

1 https://www.reuters.com/article/us-usa-oil-outlook/u-s-to-become-net-petroleum-exporter-in-2020-eia-idUSKBN1YE28P

2 https://www.congress.gov/bill/116th-congress/house-resolution/109/cosponsors

3 https://joebiden.com/climate-plan/

4 Are Carbon Taxes To Blame For Europe's Energy Crisis? | OilPrice.com

5 https://www.bloomberg.com/news/articles/2021-09-27/europe-s-energy-crisis-is-about-to-go-global-as-gas-prices-soar

"climate industrial complex."[6]

As this report will show, these climate agitators, in league with Biden's EPA, are trying to shift the focus from their failed agenda by crafting misleading reports criticizing oil and gas companies for their climate "crimes." A compliant media obligingly covers their findings while turning a blind eye to their funders, which frequently include rent-seeking corporations, radical left-wing foundations, and even China's communist government.

Change the Subject

As noted, with Europe drowning in a policy-induced energy crisis, Biden and congressional Democrats are recklessly following suit, driving the U.S. to energy shortages and higher prices. Analysts are predicting skyrocketing natural gas prices this winter—they have already doubled this year over last.[7] National average gasoline prices are well over $3.00 a gallon, up from just over $2.00 when Biden came into office.

Not surprisingly, Biden has expressed no regret over rescinding the Keystone XL pipeline to bring more oil to the U.S. from Canada and mandating a "pause" in new federal oil and gas leases. At the same time, he has pleaded with the global oil cartel OPEC—which includes, among others, Saudi Arabia, Libya, and Iran—to produce more oil.

And as prices go higher, Biden is resorting to fatuous rhetoric of blaming "profiteers" in the energy industry. "There's lots of evidence that gas prices should be going down — but they haven't," Biden said recently. "We're taking a close look at that."[8] All the while, he and his allies ignore the obvious reality that more U.S. oil and gas production would create *lower* prices, *cleaner* energy, and *greater* national security.

As part of their distraction game, Biden and company are busy tarnishing the reputations of oil and gas companies with the intent of negatively shifting public opinion. To accomplish this, green groups have hired a hoard of "experts" to write and disseminate tendentious reports filled with "data" and "analysis" warning of the "existential crisis" of climate change caused by fossil fuels. These reports are drafted by activists disguised as objective financial, policy, and legal analysts, and are typically promoted as such by the mainstream media.

As part of their distraction game, Biden and company are busy tarnishing the reputations of oil and gas companies with the intent of negatively shifting public opinion.

A closer look, however, shows they are nothing of the kind. Groups such as the Coalition for Environmentally Responsible Economies, or Ceres, and M.J. Bradley and Associates have joined forces around a common strategy: produce pointed research attacking fossil fuels that furthers their political agenda, hand it to the *New York Times* and other biased media outlets, and then, voila, damaging "news" stories ensue.

6 https://www.newsweek.com/radical-green-groups-put-profits-before-planet-opinion-1638167

7 https://www.cnbc.com/2021/09/09/natural-gas-prices-are-rising-and-could-be-the-most-expensive-in-13-years-this-winter.html

8 https://www.cbsnews.com/news/gas-prices-high-profiteers-biden/

The Facts and the Record

For starters, though, it's important to set the record straight about the industry's environmental record. U.S. oil and gas companies abide by the most stringent environmental standards in the world, even as they respond to rising domestic and global energy demand.

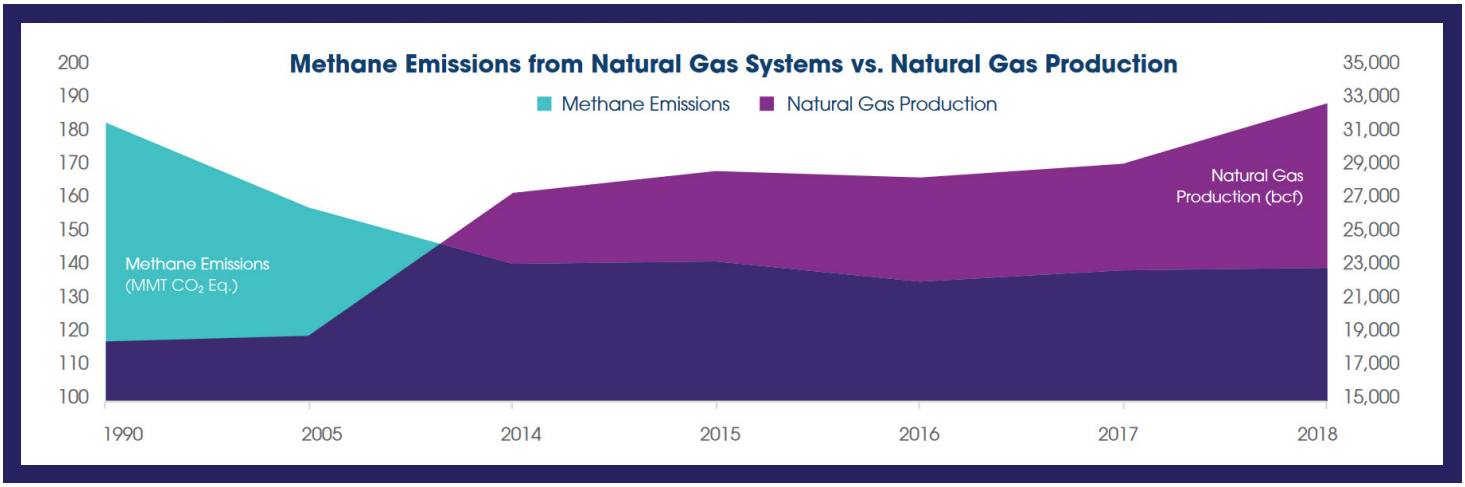
For years, activists have spent millions to create the canard that oil and gas producers are opposed to strong environmental protection, particularly when it comes to reducing emissions. Yet as the facts show, nothing could be further from the truth.

Of course, by their very nature, activists view the world through a narrow ideological lens, ignoring basic facts and evidence. And as climate change hysteria pervades the ranks of academia, the media, and Congress, the industry finds itself in their crosshairs.

Activists routinely cast industry as a grave threat to the planet. According to the Sierra Club, oil and gas pose "unacceptable risks to our communities, our environment and our climate." They cite "clear evidence that natural gas and oil extracted by fracking are major greenhouse gas contributors." Of particular concern, they argue, are the "climate-disruption impacts" from methane and carbon dioxide "emitted by extraction, transport and burning" of fossil fuels, which, they conclude, "clearly point to the urgent need of keeping fossil fuels in the ground."[9]

Setting aside the absurdity of eliminating oil and gas production (see, for example, Europe), the Sierra Club, along with its friends in Congress and the media, have tried to squelch and distort the industry's strong track record of reducing greenhouse gas emissions, while producing energy under the world's most stringent environmental standards.

Let's look at the facts. As the following chart shows, according to the Environmental Protection Agency, from 1990 to 2018, methane emissions from oil and natural gas production declined by 23%, while natural gas production increased by more than 50 percent over the same period.[10]



When it comes to reducing carbon dioxide emissions, the U.S. leads the world owing to greater use of natural gas for electric power generation. The U.S. Energy Information

9 https://www.sierraclub.org/policy/energy/fracking

10 https://www.api.org/news-policy-and-issues/methane

Administration (EIA) attributes this success largely to fuel switching to natural gas from coal.[11]

As a result, according to EIA, though the economy grew by 28 percent, power-sector CO_2 emissions declined over 30 percent from 2005 to 2019. Again, thanks to greater use of natural gas for electricity, the International Energy Agency reports that the U.S. has reduced energy-related CO_2 emissions more than any other country since 2000.[12]

When compared to the rest of the world (on a life-cycle emissions basis), U.S. liquified natural gas (LNG) delivered to Asia and Europe outperforms Russian gas, according to a 2019 study conducted by the U.S. National Energy Technology Laboratory (NETL). NETL found that "Russian gas piped to Europe has up to 22 percent more greenhouse gas emissions than European coal, while "U.S. liquified natural gas (LNG) delivered to the EU, in contrast, has up to 56 percent fewer total emissions than EU coal."[13] [14]

The Facts About Ceres

These facts belie the left's caricature of industry as a "climate villain." Yet this is precisely the theme advanced by their network of putative "experts," who issue glossy reports and receive credibility from mainstream media outlets, regardless of their baseless claims.

One green group that poses as objective and unbiased is Ceres. Ceres casts itself as investment and financial watchdog, pressing shareholders and companies in the energy, transportation, insurance, and agriculture industries to increase corporate disclosures on climate change and ramp up sustainability commitments.[15] The mainstream media, of course, play right along.

Headquartered in Massachusetts, with an office in California, Ceres reported more than $20.9 million in revenue, nearly $18.5 million in total expenses, and total assets of nearly $23.3 million, in its most recent tax returns filed with the federal government.[16]

The group presents itself on its website according to the following sanitized narrative:

> *Ceres is a nonprofit organization transforming the economy to build a just and sustainable future for people and the planet. We work with the most influential capital market leaders to solve the world's greatest sustainability challenges. Through our powerful networks and global collaborations of investors, companies and nonprofits, we drive action and inspire equitable market-based and policy solutions throughout the economy.*[17]

But when one lifts the veil, it is clear that what is underneath is an ideologically-driven environmental activist group with a singular cause to eliminate fossil fuels.

Ceres is known in good part by the company it keeps: the Tides Foundation, as well as the Rockefeller Foundation and Bloomberg Philanthropies, have donated funds to Ceres. These groups are in no way objective or seeking

11 https://www.eia.gov/todayinenergy/detail.php?id=44636

12 https://www.iea.org/articles/global-co2-emissions-in-2019

13 2019 NETL LCA-GHG Report.pdf (energy.gov)

14 https://thehill.com/opinion/energy-environment/558655-cleaner-us-gas-can-reduce-europes-reliance-on-russian-energy

15 https://ceres.org/homepage?gclid=EAIaIQobChMI1KHCjIvK8wIVEZXICh2mRACcEAAYASAAEgJmwfD_BwE

16 https://projects.propublica.org/nonprofits/display_990/223053747/02_2021_prefixes_20-22%2F223053747_201910_990_2021021717709493

17 https://www.ceres.org/about-us

to foster policies that promote a higher quality of life for the public, but are committed to left-wing causes as an end in themselves, particularly relating to environmental policy.[18]

Consider, too, that Ceres has received nearly $7.2 million from the Energy Foundation, the mission of which is "to assist in the nation's transition to a sustainable energy future by promoting energy efficiency and renewable energy," which greatly undermines any claims toward a lack of ideological bias.[19]

These groups are in no way objective or seeking to foster policies that promote a higher quality of life for the public, but are committed to left-wing causes as an end in themselves, particularly relating to environmental policy.

More interesting, however, is the foundation's China-based subsidiary and its links to the communist Chinese government. Critics of the subsidiary, Energy Foundation China, have claimed the organization aids China's environmental propaganda efforts against the U.S.

In keeping with this connection, Ceres joined other groups to promote China's major infrastructure schemes, such as its "Belt and Road Initiative," even as that very initiative subsidizes environmentally damaging projects all over the world.[20] Moreover, a review of the public record shows Ceres regularly praises China for its progress on clean energy but rarely criticizes China's abysmal human rights and environmental records.

On top of this, Ceres received $1.3 million from the Climate Works Foundation, which distributes millions of dollars to green activists, and lists as "funding partners," among other climate leftists, the Bezos Fund, run by Amazon CEO Jeff Bezos, and Bloomberg Philanthropy (which in turn gives to Ceres, a fact demonstrating the incestuous nature of these groups), started by avowed progressive Michael Bloomberg.[21]

M.J. Bradley and Associates

Why should anyone care about Ceres? Because in another partnership of convenience, Ceres has teamed up with M.J. Bradley & Associates (MJB&A), a left-leaning group disguised as a team of serious analysts purportedly producing "objective" commentary on the oil and gas industry's environmental record.

As with Ceres, MJB&A describes itself innocuously as providing "strategic consulting services to address energy and environmental issues for the private, public, and non-profit sectors." The group claims to "create value and address risks with a comprehensive approach to strategy and implementation, ensuring clients

18 https://eelegal.org/wp-content/uploads/2015/07/Big-Donors-Big-Conflicts-Final1.pdf

19 https://eelegal.org/wp-content/uploads/2015/07/Big-Donors-Big-Conflicts-Final1.pdf

20 https://yaleclimateconnections.org/2020/02/the-potential-climate-consequences-of-chinas-belt-and-roads-initiative/

21 https://www.climateworks.org/about-us/funding-partners/

have timely access to information and the tools to use it to their advantage."[22]
A closer look at MJB&A staff reveals an entity comprised of partisan leanings, starting with the group's namesake and founder, environmental activist Michael Bradley. Bradley was the former executive director of the Northeast States for Coordinated Air Use Management (NESCAUM), which has long served as a loyal adjunct of the environmental movement.

NESCAUM's members are some of the most progressive states in the nation, including Vermont, Massachusetts, Connecticut, Maine, New York, New Hampshire, New Jersey, and Rhode Island. The group, which has received funding from EPA,[23] was one of the architects of the Regional Greenhouse Gas Initiative, or RGGI, "the first cap-and-trade program in the country designed to reduce GHG emissions from electricity generation."[24]

Bradley also formed the "Clean Energy Group" (CEG) in 1997, which "consists of electric generating and distribution companies committed to working with policy makers and other stakeholders to promote effective environmental policy options in the areas of air quality, water, and climate change." CEG, which at one point included such self-proclaimed, environmentally conscious energy companies as Exelon, Con Edison, and PSEG, has long supported radical efforts to address climate change.[25] For example, in 2013, the White House touted CEG's support for President Obama's controversial plan "to reduce carbon pollution."[26]

Other MJB&A staff include Paul Allen, the group's senior vice president, who served for five years "on the senior staff" of the Natural Resources Defense Council[27], one of the nation's most extreme environmental groups with questionable ties to the Chinese government.[28]

There's also policy analyst Sophia Hill, who served as a "policy intern" for the New York State Attorney General's Office in their Bureau of Environmental Protection and did internships with the New York City Mayor's Office of Sustainability.[29]

Ceres, MJB&A, and The NY Times

Earlier this summer, MJB&A released a study of the oil and gas industry, titled, "Benchmarking Methane Emissions: Oil and Natural Gas Production in the United States." Funded by Ceres, and the environmental group Clean Air Task Force (along with Bank of America), MJB&A presented its findings as an authoritative analysis of the industry's record on addressing methane emissions.

The New York Times reported on the analysis, casting it as a major environmental scandal for independent oil and gas companies. "According to a startling new analysis of the latest

22 https://www.mjbradley.com/

23 https://www.nescaum.org/documents/nescaum-final-rept-to-epa-ee-in-naaqs-sip-roadmap-case-studies-20140522.pdf

24 https://www.nescaum.org/focus-areas/climate-and-energy

25 file:///C:/Users/MCWORK/AppData/Local/Temp/EPA-HQ-OAR-2008-0708-0356_attachment_1.pdf

26 https://obamawhitehouse.archives.gov/blog/2013/06/27/business-leaders-support-president-obamas-plan-reduce-carbon-pollution

27 https://www.eli.org/bios/paul-j-allen

28 https://www.washingtonpost.com/news/energy-environment/wp/2018/06/05/house-republicans-attack-environmental-group-for-its-climate-work-in-china/

29 https://www.mjbradley.com/professionals/sophia-hill

emissions data disclosed to the Environmental Protection Agency," the *Times* recounted, "five of the industry's top ten emitters of methane, a particularly potent planet-warming gas, are little-known oil and gas producers, some backed by obscure investment firms, whose environmental footprints are wildly large relative to their production."[30]

The *Times* reported that "companies are buying up high-polluting assets directly from the largest oil and gas corporations, like ConocoPhillips and BP; in other cases, private equity firms acquire risky oil and gas properties, develop them, and sell them quickly for maximum profits." The paper singled out Blackbeard Operating, Flywheel Energy, Hilcorp, Scout Energy, and Terra Energy Partners—noting that "each reported emitting more of the gas than many industry heavyweights."[31]

Ceres also chimed in, with Andrew Logan, the group's senior director of oil and gas, telling the *Times*, "It's amazing how the small operators manage to constitute a very large part of the problem." "And being a clean operator," he continued without offering any supporting evidence, "unfortunately, isn't a priority in this business model."[32] (Of course, this assessment comes from Logan, the former employee of the extremist advocacy outfit, the Public Interest Research Group (PIRG). According to his bio, Logan "led the group's campaign to protect the Arctic National Wildlife Refuge."[33])

Despite the gravity the *Times* confers on the MJB&A study, it's easy to show that the group's analysis, and the *Times's* superficial reporting of it, rests on a house of cards, which collapses once key facts about methane emissions from the oil and gas industry are properly explained.

Emissions Data "Limitations"

First, the linchpin of the study is that it relies entirely on greenhouse gas (GHG) emissions data from the Environmental Protection Agency (EPA).[34] The data are drawn from "Subpart W" of the Greenhouse Gas Reporting Program (GHGRP) and data calculated from assumptions in EPA's annual Greenhouse Gas Inventory (GHG Inventory).[35]

In a necessary and important concession, which the *Times* conveniently ignored, MJB&A flagged for readers the "limitations" of EPA's data. Just what are those "limitations"? For starters, as MJB&A points out, given the practical difficulty of measuring methane emissions from various points in the oil and gas supply chain, EPA is forced to use "emissions factors."[36] This is simply a sophisticated term for an

30 https://www.nytimes.com/2021/06/02/climate/biggest-methane-emitters.html

31 Ibid at 20.

32 Ibid at 20.

33 https://www.ceres.org/about-us/staff/logan

34 https://www.mjbradley.com/sites/default/files/OilandGas_BenchmarkingReport_2021.pdf

35 The GHGRP provides the basis for the GHG Inventory, and the data for methane emissions from the oil and gas industry are the same both.

36 EPA: "An **emissions factor** is a representative value that attempts to relate the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant. These factors are usually expressed as the weight of pollutant divided by a unit weight, volume, distance, or duration of the activity emitting the pollutant (e.g., kilograms of particulate emitted per megagram of coal burned). Such factors facilitate estimation of emissions from various sources of air pollution. In most cases, these factors are simply averages of all available data of acceptable quality, and are generally assumed to be representative of long-term averages for all facilities in the source category (i.e., a population average)." https://www.epa.gov/air-emissions-factors-and-quantification/basic-information-air-emissions-factors-and-quantification

educated guess.

As MJB&A noted, "The use of emission factors to *estimate* total emissions relies on the emissions factor being representative of *average emissions for a given activity*." (Emphasis added) Put another way, EPA doesn't get *actual* emissions data; and therefore, what the actual emissions are is significantly lower or higher than the agency's estimates. What is clear is that the *Times* equates EPA's emissions data with *reality*, which is incorrect.

To give a more granular sense of the unreliability of EPA's data, one can simply take EPA at its word. Apparently, the *Times* and MJB&A were unaware, or chose to ignore, the flashing red light accompanying EPA's GHG inventory report, otherwise officially known as the "Inventory of Greenhouse Gases and Sinks: 1990-2019" (published this year). In Appendix 7, titled, "Uncertainty," EPA provides a frank assessment of the quality of the data they collect and report in both the Inventory and the GHGRP.

What does uncertainty mean in this context? It is "the lack of knowledge regarding the true value of a quantity."[37] To say that EPA's methane emissions data are, we simply don't know. Moreover, that uncertainty is compounded by several other factors. According to EPA:

> *Note, overall uncertainty estimates in the Inventory capture quantifiable uncertainties in the input activity and emission factors data, but do not account for the potential of additional sources of uncertainty such as modeling uncertainties, measurement errors, and misreporting or misclassification.*[38]

To get a quantitative sense of how meaningless EPA's emissions reporting is, one must dig deep into the agency's emissions tables and charts. With respect to methane emissions, EPA found that the entire natural gas system has an uncertainty range from -15% to +14%. (That range, by the way, also ignores uncertainty with respect to individual sites, which would likely push the uncertainty higher.) Methane emissions data from the "Petroleum System" has an uncertainty range from -24% to +29%, while the uncertainty range for emissions data from abandoned oil and gas wells is -83% to +219%.[39] To say the least, this is astonishingly substandard.

To say that EPA's methane emissions data are "uncertain," however, doesn't quite capture how relatively worthless they are.

What's worse, MJB&A takes uncertain industry-wide data to an even more granular, more uncertain company-specific level and makes spurious claims about the emissions of individual companies that are, again, not based on their *actual* emissions, but extrapolations of EPA's guesses.

There's more. In its GHGRP, EPA relies on over 100 emissions factors, with some based on where a source is located (e.g., the Eastern or

37 https://www3.epa.gov/ttn/chief/efpac/documents/ef_uncertainty_assess_draft0207s.pdf

38 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019 – Annex 7 (epa.gov)

39 Ibid at 25.

Western US). In practice, this means that there could be two identical sites with the same emissions profile, but they would be measured with two completely different values for their reported emissions.[40]

The lack of credibility of EPA's GHGRP is something that many stakeholders seem to agree on. For example, according to the liberal Center for Public Integrity, most of EPA's emissions factors are unreliable, so which makes it curious why MJB&A and the *Times* think otherwise.[41]

To make matters even worse, MJB&A reveals that it simply ignored what it calls "work practices" by oil and gas companies—or the significant efforts they undertake to reduce emissions on site.

As the authors note, the fruits of those efforts don't get reflected in the emissions factors EPA uses in its GHGRP. "Many producers implement work practices to reduce emissions and, in some cases, separately report these reductions to EPA through voluntary programs," the report explains. "However, unless the practices result in the use of a lower emissions factor or changes in activity data, *these reductions are not incorporated into reported GHGRP data and are not accounted for in this analysis*."[42] (Emphasis added)

The Final Analysis

In the final analysis, then, unless emissions data were concocted out of whole cloth by EPA, *The New York Times* and the partisans at Michael J. Bradley and Associates ignored it. These facts were overlooked because they conflict with the narrative of oil and gas as a collective "climate criminal."

Neither dared to report balanced or objective news from the sector, much of which is positive concerning their stated objectives of cleaner energy. For example, methane emissions from hydraulically fractured natural gas well completions have fallen more than 85 percent since 1990. Neither did they report that replacing coal with natural gas in electric power generation helped the U.S. achieve 30-year lows in carbon dioxide emissions from the utility sector.[43]

The lack of credibility of EPA's GHGRP is something that many stakeholders seem to agree on.

For a group like Ceres, nothing the industry does will ever suffice, for, as Ceres itself put it, "We now know that the most ambitious actions of a few companies, or even a few hundred, aren't enough."[44] When they combine efforts with idealogues such as Michael Bradley, and their joint "objective analysis" is promoted by outlets

40 https://www.epa.gov/system/files/documents/2021-10/subpart_w_2020_sector_profile.pdf

41 https://publicintegrity.org/environment/most-of-the-epas-pollution-estimates-are-unreliable-so-why-is-everyone-still-using-them/.

42 Ibid at 31.

43 https://www.api.org/news-policy-and-issues/news/2018/11/13/icymi-api-previews-industrys-comments-on-epas-proposed-amendments-to-nsps-ooooa

44 https://www.ceres.org/climate/ambition2030

such as *The New York Times,* it is clear that the information being reported to the public lacks both objectivity and credibility.

But as the world, including the U.S., stands on the precipice of a global energy crisis, what is clear more than ever is that fossil fuels are essential for a growing, thriving, modern economy. And just as apparent is that when the production of these fuels occurs domestically within the U.S., it is a positive development both for our nation's economic security and the overall betterment of the environment.

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