

January 31, 2022

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Re: Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review
Docket Number EPA-HQ-OAR-2021-0317 FRL-8510-02-OAR

Dear Administrator Regan:

As physicians, nurses, public health professionals and healthcare workers dedicated to providing our patients with a healthy future, we urge you to finalize comprehensive, loophole-free methane safeguards.

We thank the U.S. Environmental Protection Agency (EPA) for recognizing the threats posed by pollution from the oil and gas industry, and for proposing a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. We urge EPA to strengthen and finalize the proposal into law without delay.

Climate change is a health emergency, and methane - a significant component of what is often referred to as “natural” gas - is a powerful climate pollutant. Methane is a dangerous greenhouse gas. Eighty-six times more potent than carbon dioxide, it is making our planet warmer, and public health is being harmed. To avoid catastrophic tipping points in the climate system, we must reduce greenhouse gases, including methane, dramatically and immediately. A recent report from the Lancet Medical Journal highlighted that without aggressive action to slash greenhouse gas pollution, the climate crisis will become the “defining narrative of human health.” The proposed rule is a vital step forward in addressing these health threats, but must go further.

Stronger final rules will not only curb greenhouse gases, they will also result in immediate public health benefits by reducing volatile organic compounds, or VOCs. Some VOCs can cause cancer, affect the nervous system, or cause birth defects. In addition to being toxic, VOCs contribute to the formation of ground-level ozone pollution, which causes respiratory and cardiovascular harm, heart attacks and asthma attacks, stroke and early death. Ozone is also linked to premature birth, which with low birth weight is a leading cause of infant death. Communities living near oil and gas operations are especially at risk from these toxic emissions, and strong final standards are crucial to protect them.

We urge you to strengthen the proposed rule to reduce methane pollution from new and existing oil and gas operations by 65 percent of 2012 levels by 2025. This is an achievable target, and one that can be met using existing technologies, at low cost. We also urge you to strengthen requirements for smaller, low-producing wells require more

frequent leak detection monitoring and repair ; and put an end to the practice of routine flaring (burning of waste gas that results in harmful air pollution.) Requiring the oil and gas industry to take the most effective steps possible to prevent fugitive emissions of methane and other gases, and to capture those gases that do escape, will reduce climate pollution and result in direct health benefits in communities near oil and gas operations.

We urge EPA to strengthen and then quickly finalize requirements for new, reconstructed and modified oil and gas wells and equipment and standards for existing sources.

Sincerely,

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