

EPA Public Hearing for the Methane Emissions Reduction Program
Diana Van Vleet Testimony
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Thank you so much for the opportunity to speak to you today. My name is Diana Van Vleet, Director of Nationwide Clean Air Advocacy at the American Lung Association. I want to express the Lung Association's support for the U.S. Environmental Protection Agency's proposed regulations to implement the Methane Emissions Reduction Program's (or MERP) Waste Emissions Charge (or WEC) for Petroleum and Natural Gas Systems. We'll share additional thoughts in written comments, but I want to share an overview today of the profound importance of this action for people's health.

In the midst of many acronyms and technical figures, it is easy to forget the real-world significance of proposed regulatory actions like the one we are talking about today. The Methane Emissions Reduction Program's waste emissions charge, which was mandated by Congress in the Inflation Reduction Act, is a commonsense fee that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution.

Reducing methane pollution is one of the fastest, most cost-effective ways to immediately slow our current rate of climate change, and oil and gas companies are the largest industrial source of methane. The climate crisis is upon us, and the health of everyone in this country is at risk. It is impossible to overstate the importance and urgency of this problem. According to [NOAA](#), the U.S. experienced 28 separate weather and climate disasters costing at least 1 billion dollars in 2023. That number puts 2023 into first place for the highest number of billion-dollar disasters in a calendar year. Record-breaking oppressive heat scorched much of the country, and deadly wildfires took a devastating toll. Climate change makes air quality worse – from wildfire smoke, to more ground-level ozone pollution due to increased formation in rising temperatures, to dangerous mold after flooding events. In my capacity as an advocate for the Lung Association, I am telling you that mitigating the worst impacts of climate change is an integral priority for protecting lung health. And in my capacity as a parent, I am urging you to take as much meaningful climate action as possible – including strong and effective implementation of the WEC – to try to protect a livable world for future generations.

Additionally, there are a number of other dangerous pollutants released alongside methane from oil and gas development. These include volatile organic compounds (VOCs), which combine with nitrogen oxides to form harmful ground-level ozone pollution, as well as toxic air pollutants such as benzene which is known to cause cancer. Ozone pollution can cause asthma attacks, strokes, heart attacks, and even premature death. Communities living near oil and gas wells face greater exposure and risks from these pollutants, and are more likely to be low-income communities and communities of color.

We'll elaborate on this more in our written comments, but I'll say here that we're calling this rule to be finalized quickly, and for the final rule to continue to include the following key requirements:

- Ensuring the regulatory compliance exemption is only available once final standards and plans are in effect in all states that are at least as strong as EPA's 2021 proposal, and requiring operators to demonstrate full compliance across their facilities;
- Laying out clear criteria for operators seeking to claim an exemption for an unreasonable delay in permitting;
- Requiring a demonstration from operators seeking an exemption for plugged wells that their wells have been properly plugged in accordance with all requirements and are no longer polluting;
- Establishing transparent calculations and methodologies for determining an owner or operator's net emissions; and
- Including verification protocols to ensure that exemptions are only available once the conditions in the law are met and that fee obligations reflect accurately reported emissions.

Thank you so much for your important work on this.