

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

February 13, 2023

Re: Docket ID No. EPA-HQ-OAR-2021-0317

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 limits on methane and other pollutants from new and existing oil and gas operations.

Oil and gas industry operations emit methane, a greenhouse gas that has more than 80 times the warming power of carbon dioxide over the first 20 years in the atmosphere. Methane is fueling climate change, which is a health emergency. Warmer temperatures lead to more frequent and extreme weather events like flooding and excessive heat, more intense wildfires and longer allergy seasons, and they make air pollution worse. All of these carry health impacts.

Science shows that the country has a rapidly closing window to drastically reduce greenhouse gases before the impacts of climate change become catastrophic. Requiring cleanup of methane pollution is a critical step to slowing the pace of climate change and achieving long-term health benefits.

Methane pollution is not the only concern when it comes to oil and gas operations. Harmful pollutants like volatile organic compounds (VOCs) are also emitted, which can worsen asthma and other respiratory diseases, damage the nervous system and cause developmental harm. Some VOCs, like benzene, are known carcinogens. When VOCs enter the atmosphere, they interact with sunlight to form ozone pollution – leading to even further reductions in air quality. The health impacts stemming from oil and gas operations impact the entire country, but people living closest to oil and gas industry operations, including wells, face greater harm. Tribal communities, communities of color and people experiencing poverty are also at a great risk of health harm from exposure to poor air quality and climate change impacts.

EPA must finalize methane rules into law that reduce pollution from oil and gas operations by requiring regular monitoring from sources – including smaller wells – and prohibiting the practice of routine flaring. Hundreds of thousands of wells across the country are low-producing wells that emit a disproportionate amount of methane emissions. Requirements for those wells to conduct regular leak monitoring will cut down on some of the rogue emissions of methane that are leaked during the process. The practice of flaring – burning unused product of as waste – emits a host of climate and health-harming pollutants. Banning the practice will provide further reductions in emissions.

Additionally, we urge EPA to include monitoring programs to meet commitments to prioritize environmental justice by ensuring that frontline communities most harmed by oil and gas sites are included and can hold polluters accountable.

We urge EPA to build on its current proposal and strengthen limits on pollution from new, reconstructed and modified oil and gas wells and equipment and standards for existing sources, and then to quickly finalize the rule.

Sincerely,

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