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Testimony for Additional Reconsideration Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review

As Prepared for Delivery

Hello, my name is Emily Thompson, and I am the Manager of Nationwide Policy for Clean Air at the American Lung Association. I am here today to oppose this proposal to revise the 2024 Methane Rule and to urge EPA to uphold strong methane pollution protections. First, thank you for opening a second day of public testimony and for taking the time to hear from the public on this critical issue.

EPA has already substantially delayed the implementation and enforcement of the 2024 Methane Rule. With this proposal, EPA is further weakening the critical standards, leading to increased health harms to communities living closest to oil and gas production and locking in continued exposure to dangerous air pollution for years to come.

The 2024 Methane Rule was developed with significant input from national health experts, community leaders and advocates, the oil and gas industry, investors and members of Congress. EPA has a responsibility to protect human health and the environment, not rewrite the rules to benefit polluters.

Methane emissions, particularly from abandoned and underregulated oil and gas wells, represent a significant and preventable threat that is accelerating global warming. Over a 20-year period, methane is more than 80 times more potent than carbon dioxide. At a time when climate change is already endangering the health of millions of people, we cannot afford weakened protections. Record-breaking heat, wildfires, floods and prolonged droughts are putting communities at risk, and delaying action will only make these threats worse. Climate change also worsens air quality, extends allergy seasons and increases the risk of vector-borne diseases like Lyme disease and West Nile virus.

But oil and gas operations are not only a climate threat. Methane is released alongside other harmful air pollutants, including volatile organic compounds, among them the known carcinogens benzene and formaldehyde as well as nitrogen oxides, which contribute to ground-level ozone pollution. Together, these pollutants are directly linked to asthma attacks, reduced lung function, heart disease, adverse birth outcomes and increased risk

of cancer. EPA's own analysis of the 2024 methane rule showed the standards would prevent up to 1,500 premature deaths and 100,000 asthma attacks each year.

And this burden is not shared equally. People living near oil and gas operations can face greater exposure to harmful emissions. Children, older adults, outdoor workers and people with existing lung disease are especially at risk.

Yet EPA is proposing to let "low-producing wells" off the hook. These wells account for about 80% of the wells in the U.S., and they are primarily owned by large corporations. More than half of all production-related methane emissions come from low-producing wells, also known as marginal wells. Exempting them would significantly increase the methane and harmful co-pollutants released into the air. In fact, nearly one in 10 people in the U.S. live in a county with over 1,000 low-producing, high-polluting wells. EPA presents two options for categorizing wells, but neither protects the public. Whether EPA gives weaker requirements to "marginal" wells or "conventional" wells, the result is the same: more methane and more harmful air pollution in our communities.

EPA is also proposing to weaken requirements intended to reduce routine flaring at oil wells. Flaring is not a harmless way to dispose of gas. It adds more pollution to the air in nearby communities. EPA should strengthen protections that prevent unnecessary flaring, not create more opportunities for it.

Taken together, these revisions would weaken protections across many sources of oil and gas pollution, increasing the cumulative burden on communities already living with unhealthy air. EPA's core mission is to protect public health. Any further weakening of methane standards will expose more Americans to harmful pollutants and accelerate the climate impacts we are already seeing. We cannot afford to roll back strong methane pollution protections.

That is why I am urging EPA to abandon this proposal and uphold strong methane standards. Thank you for the opportunity to testify today.