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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 and thank you for the opportunity to testify today. My name is Liz Scott and I'm speaking today on behalf of the American Lung Association. I'm here to oppose EPA's proposed reconsideration of the 2024 methane rule – a rule that health organizations, including the American Lung Association championed, as a victory for public health.

The rule went through a robust process with stakeholder engagement from all sectors. The health community viewed strengthening standards from the oil and gas sector as a top priority because of the health protections it would provide to communities living near oil and gas wells. When methane is emitted – either unintentionally through leaks or intentionally through flaring – harmful air pollution is also released. Volatile organic compounds – including known carcinogens like benzene and formaldehyde – and nitrogen oxides, carry direct health harms particularly for nearby communities. VOCs and NOx also contribute to the formation of ground-level ozone pollution or smog.

One of the provisions in the 2024 rule is the Super Emitter Response Program which aims to more quickly address some of the largest emitters through third-party monitoring. Technology has advanced to the point where we can visibly see major methane pollution vents. This is a win for public health, resource utilization and transparency. Satellite technology is giving regulators, operators and the public better information than ever before. EPA should welcome that information to prevent the waste of valuable energy resources and stop co-pollution from impacting communities, instead of proposing to eliminate the program.

I also want to spend time on something that I've highlighted in many other public hearings the agency has held recently. Yet again, EPA has proposed a rule that will have implications on health without calculating what those impacts will be. This continues a dangerous pattern of hiding the information from the public on what these rollbacks will do. Here's what we do know – the 2024 methane rule was estimated to prevent up to 1,500 premature deaths and 100,000 asthma attacks each year.

EPA admits that this proposed rollback will result in 60 million *more* tons of methane, 17 million *more* tons of volatile organic compounds and 22.3 million *more* tons of hazardous

air pollutants. This means more kids with asthma at risk for asthma attacks. More kids being at risk for developing leukemia. More babies being born premature. More communities faced to breathe in dangerous levels of air pollution simply by going to work, play or worship.

And this is before you begin to factor in the health harms of disasters that are fueled by greenhouse gas emissions like methane. We've had too many examples in recent years of disasters wreaking havoc on the health and livelihood of families across the nation. Wildfires that grow beyond containment destroying property, lives and communities. Flooding wiping out both coastal and mountain communities. Temperatures reaching unprecedented heights, leading to heart attacks, stroke and premature death. Allowing 60 million more tons of methane into the atmosphere will only accelerate these disasters.

At a time when costs are rising for families across the board, we should not be making it more likely that they'll need medical care or have to rebuild lives after a disaster. EPA's mission is to protect human health and the environment. This rollback is another example of EPA abandoning that cause in favor of saving money for polluters. I again implore the agency to return to its mission of protecting public health and abandon this reconsideration.