

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

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Comment From Academic Experts on Air Quality, Climate Change and Health and Medical Professionals on the New Source Performance Standards and Emissions Guidelines For New and Existing Sources in the Oil and Gas Sector

Thank you for proposing strong air pollution standards for new and existing oil and gas wells and compressor stations that will help curb the dangerous effects of the climate crisis, reduce asthma-causing smog pollution, and limit the emissions of known carcinogens like benzene.

I support the proposal to require air pollution inspections at all gas wells, regardless of size, because it will better protect public health in frontline communities and reduce a significant amount of climate pollution. The proposal to require air pollution inspections until a gas well is plugged will finally help address the pervasive threat of abandoned gas wells constantly leaking pollution across the country. I also appreciate and support the zero emission standards for pneumatic devices and pumps, which will cut a significant amount of pollution compared to current equipment designed to regularly leak pollution.

Pennsylvanians have the most to benefit from this federal rule-making. More Pennsylvanians are exposed to increased cancer risks caused by the oil and gas industry than residents in [any other state in the country](#). Pennsylvania is the second-largest gas producing state, and our gas industry emits upwards of 1.1 million tons of methane annually.

EPA must reduce greenhouse gases as much as possible, especially given that climate change is already causing devastating impacts on Pennsylvania communities and communities across the country. According to a recent study from the [National Oceanic and Atmospheric Administration \(NOAA\)](#), last year, the U.S. experienced 18 separate billion-dollar weather and climate disasters, leading to the deaths of at least 474 people. EPA's draft rule will reduce estimated 36 million tons of methane emissions from 2023 to 2035, the equivalent of 810 million metric tons of carbon dioxide, while advancing technical careers through increased inspection or monitoring requirements. This proposed standard is a massive step forward in reducing the extremely powerful greenhouse gas methane, but must go further.

The most important way to strengthen the rule is to eliminate unnecessary gas flaring and venting. In the current draft, EPA would continue to allow unnecessary gas flaring and venting if a company claims it is unable to capture and repurpose gas that is released during oil drilling or liquids unloading. Liquids unloading activities are commonly referred to as "blowdowns" and are a significant source of air pollution in Pennsylvania. Their frequency is also routinely underestimated by the Pennsylvania Department of Environmental Protection (DEP) in air pollution permits.

We also urge EPA to clarify how the agency will evaluate and approve/deny venting and flaring applications from operators, including what role states will have. Rather than applying for an

exception to create air pollution, companies could instead apply for technical assistance in avoiding concentrated, high-emission pollution incidents.

The rule's potential to empower frontline communities with resident-led monitoring projects will be another massive step forward in terms of how the public is able to engage with neighboring industry. EPA must work with air monitoring professionals to promote resident participation in the Super-Emitter Response Program. EPA should provide a clear pathway and resources for impacted residents to connect with air monitoring professionals in order to meet the EPA's stringent standards to participate in the Super-Emitter Response Program. EPA should proactively recruit impacted residents in the most vulnerable communities in oil and gas regions to participate in community-focused air monitoring programs with professionals.

EPA must not allow gas companies to apply for exceptions that will undo the potential benefits of this rule. We must not miss this rare opportunity to act boldly on climate and health.

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