

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

January 31, 2021

Administrator Regan,

As President Biden and you have repeatedly stated, we are facing a climate emergency that necessitates swift action and strong leadership. The 46 undersigned Pennsylvania organizations write to you today to express our support for the Environmental Protection Agency's (EPA) efforts to address climate change by proposing rules to reduce methane pollution, a powerful greenhouse gas, from new and existing oil and gas infrastructure. However, we urge you to strengthen the proposed rule to ensure it reduces as much methane and health-harming pollution as possible.

As the third-largest greenhouse gas polluting state and the second-largest natural gas producer in the nation, Pennsylvania bears an outsized responsibility to address climate change. According to a 2020 analysis, the Environmental Defense Fund concluded that oil and gas-related methane emissions in Pennsylvania are more than 15 times higher than industry-reported data and total 1.1 million tons of methane per year. Just over half of those emissions are from low-producing, marginal well sites. The annual climate impact from oil and gas infrastructure is over double that from all the cars in the state combined.

Methane, the principal component of natural gas, is 87 times more potent than carbon dioxide over a 20-year time period. Recent studies found U.S. methane emissions levels to be 60 percent greater than currently estimated by the EPA.

This methane pollution is supercharging climate change, leading to longer, hotter summers that make air pollution worse by increasing ground-level ozone, the main ingredient of smog. Pennsylvania is seeing increasingly strange weather and more severe storms and floods that damage property and infrastructure and threaten our state's substantial agricultural sector. Warmer temperatures also increase the risk of vector-borne diseases such as Lyme disease and West Nile virus. Pennsylvania has the highest incidence of Lyme disease in the nation.

In addition to methane, smog-causing volatile organic compounds (VOCs) and toxic hazardous air pollutants (HAPs), including cancer-causing agents, are released in significant quantities throughout the oil and gas sector development process. Ozone smog from oil and gas industry pollution is associated with 1.1 million summertime asthma attacks in children – Pennsylvania has the tenth highest asthma rate in the nation, and some neighborhoods in Allegheny County have an asthma rate that's triple the national average. In addition, residents and families that live closest to development are at higher risk of cancer.

While this rule is a critical step forward, we also urge the EPA to include regular leak detection and repair requirements for smaller, leak-prone wells. These wells are found throughout our state, and their numbers are growing each and every year. According to the University of

Cincinnati's Amy Townsend-Small, Ph.D., many wells that produce less than a barrel of oil per day leak into the atmosphere more than 100 percent of their reported gas production.

Under the current proposal, operators that calculate lower potential emissions (less than 3 tons per year of methane) could avoid all monitoring after just one initial inspection. Rigorous monitoring requirements that reduce emissions by 80 to 90 percent (consistent with EPA's estimates for quarterly to monthly inspections) must apply comprehensively across all facilities. This includes small, leak-prone wells, which have been shown to leak at high rates (including larger, "super-emitter" facilities that leak a very large amount of methane over a short time period). These small wells contribute over half of the nation's oil and gas methane emissions. These wells comprise the majority of the nation's fleet of wells but just a very small percentage of the nation's oil and gas production, and most are owned by larger companies with profits that dwarf the compliance costs of even the most protective regulations.

Strong action to reduce methane emissions from oil and gas production is a critical step forward in not only combating climate change but also improving the health of our children, families and communities. We urge you to strengthen the proposed rule and ensure all wells are regularly inspected including smaller, leak-prone wells.

Sincerely,

Adorers of the Blood of Christ  
Beaver County (PA) Marcellus Awareness Community (BCMAC)  
Beaver County NAACP  
Benedictine Sisters of Chicago  
Breathe Easy Susquehanna County  
Breathe Project  
Clean Air Council  
Clean Water Action  
Climate Reality Project  
Climate Reality Project: Susquehanna Valley PA Chapter  
Coalition on the Environment and Jewish Life  
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces  
Congregation of St. Joseph  
Food & Water Watch  
Friends Fiduciary Corporation  
Earthworks  
Group Against Smog and Pollution (GASP)  
Grey Nuns of the Sacred Heart  
Izaak Walton League of America - Harry Enstrom Chapter  
League of Women Voters Pennsylvania  
Lebanon Pipeline Awareness  
Lunasi Land Trust  
Moms Clean Air Force, Pennsylvania Chapter

Partners For Progress SWPA  
PennEnvironment  
Pennsylvania Alliance for Clean Water and Air  
Pennsylvania Council of Churches  
Pennsylvania Interfaith Power and Light  
Philadelphia Solar Energy Association  
Physicians for Social Responsibility - Pennsylvania  
Project CoffeeHouse  
Protect PT (Penn-Trafford)  
Responsible Drilling Alliance  
Sisters of St. Francis of Philadelphia  
Sisters of Charity Federation  
Sisters of Charity of Seton Hill  
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA  
Sisters of St. Francis of Philadelphia  
Sisters of St. Joseph of Baden, PA  
Sisters of St. Joseph of Carondelet, LA  
Sisters of St. Joseph of Cluny USA  
Sisters of the Humility of Mary  
Sisters, Servants of the Immaculate Heart of Mary  
Sunrise Movement - Pittsburgh  
Westmoreland Marcellus Citizens Group  
Working for Justice Ministry St. Paul's United Methodist Church Allison Park, PA