

11/3/2025

United States Environmental Protection Agency (EPA)
1200 Pennsylvania Ave NW
Washington, DC 20004

Re: Reconsideration of the Greenhouse Gas Reporting Program at Docket No.
EPA-HQ-OAR-2025-0186

To U.S. EPA Administrator Lee Zeldin,

Please accept this comment on behalf of Protect PT (Penn-Trafford) and our 235 members. Protect PT is a Pennsylvania nonprofit dedicated to ensuring the safety, security, and quality of life from the effects of unconventional gas development for residents in Westmoreland and Allegheny Counties. Founded by concerned parents living in the shale gas fields, our organization seeks to defend the health of Pennsylvania residents, conserve water resources, reduce pollution, and educate and empower our community members. In order for Pennsylvanians to thrive for generations to come, industry needs to operate responsibly, which is why the EPA's strong regulatory authority to safeguard our water, air, land, and climate is so important.

Protect PT's Environmental Policy Advocate can be reached at (412) 307-7099 and lauren@protectpt.org. Our business address is 3344 Route 130, PO Box 137, Harrison City, PA 15636. This comment addresses the EPA's proposal to suspend oil and gas reporting requirements under Subpart W of the Greenhouse Gas Reporting Program (GHGRP) and end reporting for all other greenhouse gas emissions from other industry sectors.

Protect PT strongly opposes the EPA's reconsideration of the GHGRP. Our state, Pennsylvania, is the second largest producer of natural gas after Texas, and we often rank in the top 10 greenhouse gas emitting states in the country. In 2018, we ranked fifth.¹ That year, the top 10 emitting U.S. states were responsible for nearly half of the country's total GHG emissions, a sum approximately equal to the combined emissions of Japan, Canada and Germany.²

The U.S. is a major emitter and will have an outsized impact on the entire globe's progress towards mitigating climate change, making the proposed near total elimination of the Greenhouse Gas Reporting Program a devastating blow to at-risk communities all around the

¹ World Resources Institute. "8 Charts to Understand U.S. State Greenhouse Gas Emissions" (2019). <https://www.wri.org/insights/8-charts-understand-us-state-greenhouse-gas-emissions>

²*Id.*

world. Our country is already afflicted by sea level rise, increased natural disasters, and longer wildfire seasons, and ceasing data collection on the root cause of these calamities will only leave our scientists, engineers, policy-makers, and business leaders in the dark as they try to address them.

The members of my organization are particularly aware of the effects of under-regulated industry. Protect PT started when a well pad was proposed only half a mile away from the home of our Executive Director, Gillian Graber. She and other concerned parents suddenly had to confront how the pollution, disturbances, and stress from oil and gas development would affect them and their families long term. So, they banded together to create a grassroots group to defend themselves. We know that when greenhouse gases leak from gas wells and other infrastructure, dangerous air pollutants escape too. These toxins manifest in the form of nosebleeds, headaches, and nausea for those living nearby and can cause and exacerbate local cancer and asthma cases. Programs like the GHGRP, which identify high emitting facilities and lead to emissions reduction, help provide peace of mind to the frontline communities that Protect PT represents.

Ultimately, we can't fix what we can't see. Greenhouse gas emission data collection is cost effective, easily achievable, and even beneficial for companies. Air pollution from oil and gas facilities and other industrial sites is invisible to the naked eye, but tracking emissions allows companies and policymakers to "see" the problem and have the information they need to plug leaks, replace or repair old and faulty equipment, and make their operations safer for their workers and the surrounding communities. Reporting programs provide regulatory certainty, help companies plan for the future, and allow U.S. exporters to conduct business competitively in the global marketplace.

We want to remind the EPA that Congress directed the EPA to develop the GHGRP, and the program has been running successfully for 15 years. Congress also recently directed the EPA to update Subpart W oil and gas methane reporting to ensure it is empirically based and accurate. That directive remains on the books and has not been repealed or amended by Congress.

Burying our heads in the sand, denying science, destroying government tools, and stopping the collection of greenhouse gas emissions data from thousands of sites will not make the widespread and severe impacts of a warming climate any less real or noticeable. It will only make the problem more expensive and difficult to deal with. This EPA's regressive, anti-progress stance on climate change and environmental protection will damage public health and lead to stagnation in America's industries. The energy industry has adapted before, will adapt again, and naturally continues to evolve, innovate, and introduce new energy technologies that can

lead us into a cleaner, more sustainable future. Why are we attempting to beat down progress in favor of retreating into the energy portfolio and pollution levels of decades past? The EPA's mission is to protect human health and the environment by ensuring Americans have clean air, land, and water—something that Administrator Lee Zeldin is not forgetting but willfully ignoring in order to make the most politically charged decisions possible, decimate the agency's legacy from the past twenty years, destroy public trust, and cater to the big money of oil and gas.

Therefore, Protect PT is opposed to the EPA's reconsideration of the GHGRP and requests that the EPA uphold its duty to the American people by continuing the collection of this important data across all sectors.

Sincerely,



Lauren Posey
Environmental Policy Advocate



Gillian Graber
Executive Director