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

Re: Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Final Rule

To U.S. EPA Administrator Lee Zeldin,

Please accept this comment on behalf of Protect Penn-Trafford (PT) 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 Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Final Rule.

Timely compliance with the federal methane rule is important to protect public health and frontline communities in Pennsylvania. We are a major energy-producing state, second only to Texas in natural gas production, which means the federal methane rule has particular significance for us. Millions of Pennsylvanians live within a half mile of a well pad, compressor station, processing operation, power plant, storage facility, pipeline, petrochemical plant, or other shale gas-related infrastructure.¹ Some families live close to more than one of these. In 2023, Pennsylvania's oil and gas operations emitted over 1 million metric tons (MMT) of methane. That's the same amount of climate pollution as 23 coal plants or 21 million vehicles.

¹ FracTracker (2023). Studies Reveal Health Impacts from Fracking in Pennsylvania.
<https://www.fracktracker.org/2023/08/pennsylvania-health-study-results/>

Communities living alongside hydraulic fracturing wells face physical health impacts, mental health impacts, stress, and disturbances. Drilling noise escapes sound walls, constant trucking at all hours keeps residents awake at night, and constant fear of spills or breathing in invisible pollutants takes a toll. This uncertainty really affects people.

All parents want their child to have a healthy, thriving future, but when a leaking well pad is located mere yards from their child's school playground, the nature of that future can be cast into doubt. Parents wonder: Could my child have a higher risk of developing cancer later in life due to these early exposures? This is a real story faced by the Executive Director of Protect PT, Gillian Graber, and her daughter. Delaying the methane rule compliance will continue to expose frontline communities to unnecessary, dangerous air pollution.

We know that support for reducing oil and gas methane waste is widespread and bipartisan. Protect PT works primarily in rural communities, where oil and gas producing municipalities across the political spectrum have made efforts to reduce pollution in their communities and adopt regulatory ordinances. That's because everyone deserves clean air. Our community members want a bright, healthy, sustainable future for their kids and families, and the federal methane rule takes a strong step towards that vision. Companies too have already been complying with these rules for nearly a year, while some are investing and planning to comply with existing source standards in advance. And courts—including the Supreme Court—have already rejected requests to delay the standards. Clearly, delaying compliance requirements associated with these rules is unnecessary.

This rule would protect all residents from methane pollution by leveraging cost-effective and widely-available technologies to drastically reduce emissions. This includes enhancing leak detection at all wells, regardless of size, requiring zero-emission devices, eliminating unnecessary flaring, and creating a program to respond to large leaks.

Swift implementation of improved performance standards and emissions guidelines will improve health outcomes and even save lives in PA. Delaying these protections goes against the scientific consensus articulating the health harms of oil and gas emissions under existing regulations. Methane emissions from oil and gas facilities are accompanied by toxic air pollutants, including dozens that are carcinogenic even at low levels of exposure. This includes smog-forming volatile organic compounds (VOCs) and benzene. Just delaying the implementation of standards for existing sources for 12 months would result in 970,000 tons of health-harming volatile organic compounds emissions and 36,000 tons of hazardous air pollutants that otherwise would have been prevented. This is not acceptable.

Many epidemiological studies and hundreds of other investigations show a correlation between shale gas development and health impacts for residents living nearby.² Shale gas emissions can impact nearly every bodily system, but the most common impacts include:

- A range of respiratory problems from asthma attacks to chronic bronchitis.
- Headaches, dizziness, and nausea from high, short-term exposures.
- Hospitalizations for heart and lung issues.
- Negative birth outcomes, such pre-term births or low birth weights.
- Cancer.
- Mental health concerns from noise, vibration, and light pollution and the associated stress of shale gas industry activity
- Premature mortality.

This program would address one of the most concerning sources of air pollution exposure at oil and gas facilities: intentional releases, including flaring and venting. These releases are wasteful and harm the health of residents living nearby, producing spikes in pollution that are well beyond levels deemed “healthy” by federal standards. A study published last year found that flaring and venting emissions alone costs the United States \$7.4 billion in health damages and are linked to 710 premature deaths and 73,000 asthma exacerbations every year.³ Overall, timely implementation of this methane rule would *avoid* up to 1,500 premature deaths and 100,000 asthma attacks each year.

Shale gas development impacts the health of people living in direct proximity to shale gas operations, but this heavy extractive industry poses other health impacts for every resident of Pennsylvania—and our nation—no matter where they reside through its contribution to climate change. Methane is the primary component of gas and is leaked from every step of gas production, transmission, and distribution. Methane is super-fueling climate change and is 80 times more powerful at trapping heat than carbon dioxide in the short term; it is one of the single largest sources of climate-destabilizing pollution in the country and in the world. This rule will directly reduce these harmful emissions

We’re already seeing how climate change is impacting human health through extreme weather events, extreme heat, and natural disasters. This summer, our state experienced a heatwave,

² Irena Gorski and Brian S. Schwartz. “Environmental Health Concerns From Unconventional Natural Gas Development,” *Oxford Research Encyclopedia of Global Public Health* (2019).
<https://oxfordre.com/publichealth/view/10.1093/acrefore/9780190632366.001.0001/acrefore-9780190632366-e-44>.

³ Huy Tran et al. “Air Quality and Health Impacts of Onshore Oil and Gas Flaring and Venting Activities Estimated Using Refined Satellite-Based Emissions,” *GeoHealth* vol. 8, issue 3 (2024).
<https://doi.org/10.1029/2023GH000938>

and the southwestern region of PA was hit with extreme storms that left some people without power for close to a week. There are an increasing number of air quality alert days from wildfires in other parts of the continent, and the extreme heat is also making bad-air-quality days worse. Oil and gas operations contribute directly to this pollution by not only worsening climate warming, but also emitting the very air pollutants that harm our health. The 2024 EPA methane rule would prevent 58 million tons of methane emissions from 2024 to 2038, helping to avoid the worst effects of climate change. Pushing back compliance deadlines only undermines any progress already made by industry towards improved efficiency and will slash any protections and benefits promised to residents. Delaying compliance for the methane rule shows a blatant disregard for the health of our communities.

Therefore, Protect PT is opposed to the EPA's Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources in the Oil and Natural Gas Sector and requests that the EPA reconsiders this compliance delay immediately.

Sincerely,



Lauren Posey
Environmental Policy Advocate



Gillian Graber
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