

Submitted Electronically

January 31, 2022

Mr. Michael S. Regan
Administrator
U.S. Environmental Protection Agency
Washington, DC 20460

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

Dear Mr. Regan:

We the undersigned, while representing diverse faith traditions, are united in the conviction that God calls us to be stewards of this earth. We therefore submit the following comments on the proposed rule to reduce methane emissions.

The climate crisis is an [ever-worsening tragedy](#) that continues to disturb God's creation including rising sea levels, increases in temperature extremes, wildfire weather, and disturbances in precipitation patterns. These climate [impacts](#) are also detrimental to human health and wellbeing and disproportionately burden already vulnerable communities including communities of color.

Methane emissions account for [10 percent](#) of U.S. greenhouse gas emissions from human activities, with about one-third of those emissions coming from the oil and gas industry. [Pollution from methane](#) contributes to the creation of tropospheric ozone, a secondary pollutant that directly harms agricultural systems and negatively affects air quality, resulting in increased health issues like asthma, especially for those living near oil and gas facilities.

Methane pollution is a justice issue since it has a disproportionate impact on communities of color. Studies have shown that African Americans are 75 percent more likely to live near toxic oil and gas facilities, [increasing asthma rates](#) in African American children. More than [1.81 million Latinos](#) live within one half mile of existing oil and gas facilities.

Reducing gas venting and leaks by enacting strong methane pollution standards to both large and small producers will significantly reduce methane pollution, protect frontline communities, and help address climate change. The methane pollution standards should reduce routine flaring, incorporate community monitoring to allow frontline communities and other observers to engage with regulators, require monitoring and plugging of abandoned wells that are leaking methane, and ensure that leak detections and inspections happen at all wells including "low production" wells.

While communities and businesses are working to mitigate climate change, government agencies play a crucial role. The Environmental Protection Agency has an opportunity to help address the climate crisis and improve air quality by putting in place strong methane pollution standards for the oil and gas industry.

As people of faith, we believe that each human is worthy and deserving of basic needs including the need for clean air and clean water. We seek to live in a world where we are not only surviving but thriving. We stand together in urging the Environmental Protection Agency to enact robust methane pollution standards on new and existing sources of methane emissions.

Strict legal regulations would ensure that operators are not being negligent in disposal. Specifically, standards should include leak detection and repair and address leaks on seals, pumps, and connectors. Monitoring, reporting and verification standards also have a crucial role in providing accurate data on methane leakages and indicating where action needs to be taken. It is important that EPA's methane standards include provisions for community monitoring that engages frontline communities, educates and certifies community members, and requires immediate follow up on complaints filed by those certified community members.

We must act swiftly to ensure we are caring for creation and each other. We urge the EPA to create robust methane pollution standards and help protect God's creation and God's people.

Sincerely,
Catholic Climate Covenant
Christian Reformed Church Office of Social Justice
Coalition on the Environment and Jewish Life
Committee on Domestic Justice and Human Development, United State Conference of Catholic Bishops
Creation Justice Ministries
Florida Council of Churches
Georgia Interfaith Power & Light
Islamic Society of North America
Maryknoll Office for Global Concerns
Sisters of Mercy of the Americas' Justice Team
The United Methodist Church – General Board of Church and Society
United Methodist Women