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Dr. Howard Shelanski, Director
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget
Executive Office of The President
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Ref: Methane Emissions and Waste Reduction Incentive Program for Petroleum and Natural Gas Systems
RIN 2060-AW02
Docket ID: EPA-HQ-OAR-2022-0875

Dear Dr. Shelanski,

I am The Rev. Dr. Jessica Moerman, and I serve as President/CEO of The Evangelical Environmental Network. I am a climate scientist by training, and a pastor of a local church. But most importantly I am a mother of two young boys, who bring joy and light into my life.

For over 30 years EEN's ministry has worked as a matter of our evangelical faith for a world with abundant life for all where people are free from the burden of pollution, all creation flourishes in right relationship, and children have hope and expectation for a healthy, vibrant future.

EEN represents over 5 million pro-life Christians who have acted with us for clean air, pure water, and a safe climate. This includes over 250,000 pro-life Christians, who have acted specifically in support of methane reductions.

First, I want to thank you on behalf of my children for taking methane pollution seriously. The health and future of every child depends on the decisions made during this critical decade for climate change.

The Methane Emissions Reduction Program, and associated waste emissions charge, provides a critical new avenue for stopping wasteful and dangerous methane leaks that harm our children's health and contaminate God's amazing creation.

Leaking oil and gas infrastructure spew harmful pollution like methane, benzene, other volatile organic compounds (VOCs), and toxins that threaten our children's right to achieve their God-given potential and an abundant life.

A multitude of medical studies link living in proximity to natural gas development and methane production to birth defects to the brain, spine, and spinal cord[1,2] and to lower birth weight[3], which is the second leading cause of death for newly born babies and infants[4] and is associated with breathing problems and immature lungs, bleeding inside the brain, serious inflammation of the intestines (necrotizing enterocolitis), and long-term complications like cerebral palsy, deafness, blindness, and developmental delay.

Methane pollution isn't a small or isolated problem: Mapping of oil and gas infrastructure shows that over 17 million Americans, including 3.2 million children, live, work, or go to school within the 0.5 mile health threat radius of an oil and gas facility.[5]

Methane is greenhouse gas 86 times more potent than CO_2 in the first twenty years – making fugitive and leaking methane as an imperative for any hope in keeping temperature below 1.5°C by 2050 or sooner. Methane is responsible for at least one-quarter of the climate warming we are experiencing today.[6] Warmer temperatures produce more smog, increasing asthma, another serious health concern.

As life-threatening heat waves baked communities in the US and across the world over the summer, state-of-the-art research reveals that the summer's extreme temperatures would be "virtually impossible" without the influence of human-caused climate change, including wasteful leaks of methane.

The good news is that research also indicates cutting methane leaks is the fastest way to slow down climate change now.

However, since the gas industry began, it has failed to steward God's resources well on a voluntary basis. It has carelessly wasted away natural gas through routine venting and flaring. If captured and used, this gas could instead meet domestic energy needs, generating more revenue for taxpayers, private landowners, and local communities. As of 2019, approximately 150 billion cubic feet of methane (about $400 million worth of natural gas) has been wastefully flared on federal and tribal lands alone. If put to use, this natural gas could have provided energy to 2.1 million households – nearly all of the households in New Mexico, North Dakota, Utah, and Wyoming combined.

MERP is a forward-looking program, set to put the U.S. on a path to successfully and efficiently reduce oil and gas methane emissions and spur economic innovation in methane mitigation. The standards and limits set in MERP are in line with the industry-set goals, and many operators understand the need to lower their emissions and have already started doing so.

Waste emissions charge (WEC) only applies to operators with large facilities that release over 25,000 metric tons of carbon dioxide equivalent greenhouse gas emissions each year. These large oil and gas operators are only responsible for paying the charge for the portion of emissions exceeding industry-developed, performance-based targets, and many large operators will not be required to pay any fees because they have already made

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[1] Lisa M. McKenzie, Ruixin Guo, Roxana Z. Witter, David A. Savitz, Lee S. Newman, and John L. Adgate, Birth Outcomes and Maternal Residential Proximity to Natural Gas Development in Rural Colorado, Environmental Health Perspectives doi:10.1289/ehp.1306722.

[2] Casey J.A., et al., "The association between natural gas well activity and specific congenital anomalies in Oklahoma, 1997-2009," Environment International, Volume 122, January 2019, 381-388, https://www.sciencedirect.com/science/article/pii/S0160412018317999?via=ihub

[3] Stacy SL, Brink LL, Larkin JC, Sadovsky Y, Goldstein BD, Pitt BR, et al. (2015) Perinatal Outcomes and Unconventional Natural Gas Operations in Southwest Pennsylvania. PLoS ONE 10(6): e0126425. doi:10.1371/journal.pone.0126425.

[4] Jiaquan Xu, M.D., Sherry L. Murphy, B.S., Kenneth D. Kochanek, M.A., and Elizabeth Arias, Ph.D. Mortality in the United States, 2021. NCHS Data Brief No. 456, December 2022

[5] https://oilandgasthreatmap.com/threat-map/

[6] lissa B Ocko et al 2021 Environ. Res. Lett. 16 054042

investments to reduce their emissions. Similarly, an independent operator with hundreds of low-producing wells within a particular basin would likely be exempt from the charge.

This charge was designed to complement and reinforce EPA's section 111 rules for the oil and gas sector and can help drive important methane reductions before those rules go into place.

To accomplish this goal, we urge that guidance on the Waste Emissions Charge include the following:

- Implement the regulatory compliance exemption protectively, as directed in the statute, and ensuring it is only available once final standards and plans as strong as EPA's 2021 proposal are in effect in all states and by requiring operators to demonstrate compliance across their facilities.
- Establish clear requirements for operators seeking to claim an exemption for an unreasonable delay in permitting, including a showing that the action requiring a permit is the only option for mitigation and setting forth a clear test for determining when a delay is "unreasonable."
- Require a demonstration from operators seeking an exemption for plugged wells that their wells have been properly plugged, in accordance with all requirements and are no longer polluting.
- Provide transparent calculations and methodologies for determining an operator's net emissions across all segments.
- Take steps to ensure that emissions reports upon which the charge is assessed are not manipulated and are accurate by collecting empirical, unbiased data, updating, and improving subpart W reporting requirements, and auditing subpart W reports.

Finally, I urge you to finalize this rule as quickly as possible. The health and future of my children – and every child – depends on it.

Thank you for the opportunity to provide comment.

Sincerely,

Rev. Dr. Jessica Moerman
President/CEO
Evangelical Environmental Network