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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

Dear OIRA Staff.

It's been ten (10) long years since the last rule-making. Ten (10) years of ongoing methane leaks; ten (10) more years of toxic air threatening the lives and health of our unborn children, children in general, pregnant women, and indeed all of us; and ten (10) more years of a greenhouse gas 86 times more potent than CO₂ in the first twenty years, along with the associated VOCs and additional cancer-causing chemicals accumulating at higher and higher levels in our air.

During the past ten (10) years, one of my most fervent prayers, taken directly from the Bible, has been:

***How long will you defend the unjust
and show partiality to the wicked?
Defend the weak and the fatherless;
uphold the cause of the poor and the oppressed.
Rescue the weak and the needy;
deliver them from the hand of the wicked. – Psalm 89:2-4 (NIV)***

Oil and gas companies may not be wicked. Many leading oil and gas corporations and organizations, including Shell, Equinor, BP, EQT, Jonah Energy, Equitrans Midstream, and the Interstate Natural Gas Association of America, all support methane leak standards. However, many firms and trade associations have prioritized profit over the defense of our children's lives and health. It's time to put our children first, and especially for the United States Environmental Protection Agency (EPA) to live up to its mission to **Protect Human Health and The Environment**¹ and for OIRA to support the appropriate and necessary findings to control leaking and/or fugitive methane, VOC, and other hazardous substances emitted from the oil/gas sector. For the sake of our children's health, we cannot delay the implementation or extend the deadline of the rule.

¹ <https://www.epa.gov/aboutepa/our-mission-and-what-we-do>

Now is the time to address these leaks that release dangerous pollution at a rate 60% higher than the current EPA estimates.² We must implement new rules for both existing and new sources that reduce methane levels by at least 65% below 2012 levels and address the complete production, transportation, and distribution systems for the gas industry.

As pro-life evangelicals, we have a special concern for the unborn. We want children to be born healthy and unhindered by the ravages of pollution even before they take their first breath. The medical community has long known that pollution and other environmental impacts harm our unborn children, and we know that fossil fuels are the most serious threat to children's health worldwide.³ It was once thought that expectant mothers provide a shield of protection to their developing unborn child by filtering out pollutants – medical research repeatedly shows that this is untrue. Studies show that smog, VOCs, and air toxics have a disproportionate impact on life in the womb. Research by Dr. Shaina L. Stacy and others at the University of Pittsburgh suggests that low birth weights in babies in Butler County, PA, are linked to the proximity of their families to unconventional gas wells.⁴ Dr. Lisa M. McKenzie, from the Colorado School of Public Health, and other peer-reviewed research studies link birth defects to methane production.⁵ Casey J.A., et al further find that simply living within a half-mile radius of natural gas development leads to increased brain, spine, or spinal cord birth defects in children.⁶ This isn't a small or isolated problem - 2.9 million children attend a school located within 0.5 miles of an oil/gas facility, and 12.6 million American households are also within that radius.⁷ Over 85% of the medical studies⁸ Those who have studied the gas industry's impact on the environment find that emissions from oil and gas facilities and infrastructure are highly detrimental to the health of both children and adults, including heart failure, asthma, and exposure to known carcinogens.⁹ Right now, [one in three](#) people in the U.S. lives in a county with oil and gas production and are at risk of exposure to these dangerous pollutants. In addition, BIPOC communities can be [disproportionately impacted by harmful oil and gas pollution](#).

As a faith leader, father of four, and Poppop to eight grandchildren and one great-granddaughter, I strongly recommend that the promulgated methane standard be adopted and implemented without further delay, including all requirements of the current standard. The following are a few key aspects of the standard:

² Alvarez, RA et al. (2018), "Assessment of Methane Emissions from the U.S. Oil and Gas Supply Chain," *Science* 361, 186 (available at <https://science.sciencemag.org/content/361/6398/186>).

³ Perera F. Pollution from Fossil-Fuel Combustion is the Leading Environmental Threat to Global Pediatric Health and Equity: Solutions Exist. *Int J Environ Res Public Health*. 2017;15(1):16. Published 2017 Dec 23. doi:10.3390/ijerph15010016

⁴ 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, downloaded September 28, 2015, <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0126425>

⁵ 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. downloaded September 28, 2015, <http://ehp.niehs.nih.gov/1306722/#tab3>

⁶ 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>

⁷ <https://oilandgasthreatmap.com/>

⁸ Hays J, Shonkoff SBC (2016) Toward an Understanding of the Environmental and Public Health Impacts of Unconventional Natural Gas Development: A Categorical Assessment of the Peer- Reviewed Scientific Literature, 2009-2015. *PLoS ONE* 11(4): e0154164. doi:10.1371/journal.pone.0154164

⁹ McKenzie, L.M., et al., "Ambient Nonmethane Hydrocarbon Levels Along Colorado's Northern Front Range: Acute and Chronic Health Risks," *Environmental Science Technology*, April 17, 2018, 52(8):4514-4525, <https://pubs.acs.org/doi/10.1021/acs.est.7b05983>

1. **Frequent Leak Detection and Repair (LDAR)**. Leak detection programs can be used to find and fix everything from simple leaking components, such as valves, to super-emitters – the infrequent but huge emission events that arise from some improper conditions at oil and gas sites. Super-emitters can result from valves and hatches that are stuck open, flares that are blown out, or many other types of abnormal operating conditions at a site.
2. **Replacement of gas-driven pneumatic equipment**. Traditionally, oil and gas operations in North America have relied heavily upon automated equipment that uses pressurized natural gas to pump liquids or open and shut valves. This was particularly convenient at isolated sites that did not have electric power from the grid available. Since the equipment uses the pressure of the gas to do work, it is designed to release the gas into the air as it operates. Across the industry, pneumatic equipment emits a vast amount of methane pollution – over two million metric tons per year.¹⁰
3. **Reducing venting from storage tanks**. At most oil production well sites, oil is separated from gas and collected in tanks, where it is stored until it is trucked away. During this process, the oil releases methane and other pollutants dissolved in it; without controls to limit emissions, these pollutants are released into the air. These emissions can be controlled by capturing methane and other hydrocarbon pollutants and using specialized compressors to inject the hydrocarbons into the natural gas pipelines at well sites. Alternatively, if this approach is not workable, gas can be incinerated (flared), preventing the release of methane. Since incinerators emit CO₂ and other pollutants, and they waste the energy contained in the gas that they destroy, incineration is clearly not as good a choice as capturing gas, but it is far better than venting the gas.
4. **Minimizing emissions from well completions**. When oil and gas wells are hydraulically fractured, large volumes of water, sand, *and* chemicals are pumped into the well at high pressure, fracturing the rocks holding the oil and gas. The next step is to allow this liquid to flow back to the surface. However, the liquid is mixed with significant amounts of natural gas, which was typically vented to the atmosphere before states and U.S. EPA put in place rules requiring operators to control emissions of this gas by capturing it or flaring it. These rules have reduced emissions, but the rules give industry a great deal of flexibility in the way they are applied, and there is reason to believe industry is abusing this flexibility in some cases. Future regulations should ensure that operators diligently apply emissions controls to truly minimize emissions. Measurements have confirmed when operators carefully work to limit emissions from well completions, emissions will be quite low – almost 99% below EPA’s current estimate of emissions per completion.¹¹
5. **Compressors and dehydrators**. In general, this equipment is designed to release some of the methane and hydrocarbons it handles. Compressors vent gas that passes through seals for moving parts (which are not designed to be hermetic) and dehydrators release methane and other hydrocarbon pollutants as they vent the water vapor that they remove from natural gas. These emission points can be effectively controlled, and rules in several jurisdictions require operators to do so, for many

¹⁰ Based on the USGHGI.

¹¹ Based on data from DT Allen *et al* (2013), “Measurements of methane emissions at natural gas production sites in the United States,” *Proc. Natl. Acad. Sci. USA* 110, 17768, (available at <https://www.pnas.org/content/110/44/17768>), and the US GHGI.

compressors and certain dehydrators. However, EPA's nationwide standards exempt thousands of older compressors and only cover larger dehydrators at a limited number of large sites.

6. **Reducing venting and flaring of gas from oil wells.** As oil production has boomed in the Permian Basin in Texas and New Mexico and in the Bakken formation in North Dakota, wells have been drilled and completed so rapidly that the gas these wells co-produce overwhelms the pipelines and other infrastructure needed to handle and transport it. In some cases, new oil wells are drilled without any gas infrastructure. And many regulators allow oil producers to simply flare off this gas, rather than requiring operators to plan oil development so that gas infrastructure keeps pace with well drilling or use alternative approaches when pipelines are not available.

The U.S., together with many other countries, has committed to cutting routine flaring by 2030, and many international oil producers have endorsed this pledge.²⁴ In order to meet that goal, federal regulations will be needed. An interim goal will be important to ensure near-term progress to eliminate flaring; an 80% reduction in flaring emissions are a proper interim target for 2025²⁵

7. **Reducing venting during maintenance operations.** Natural gas operators routinely vent wells and equipment before performing maintenance work. Wells are vented primarily to make it quicker and easier to get water out of wells in a process referred to as "wellbore liquids unloading." Numerous technologies and management practices have been found to reduce, or eliminate, emissions from this practice.¹² We recommend clear guidelines and performance standards be developed to insure maximum reductions and benefits.

In addition to the above specific rule requirements, EEN would like to understand the current method for determining the cost/benefit analysis. In the recent past, the Office of Information and Regulatory Affairs (OIRA) used the guidance to federal agencies issued by the George W. Bush administration in 2003, which state: "Your analysis should look beyond the direct benefits and direct costs of your rule-making and consider any important ancillary benefits and countervailing risks."

The Evangelical Community has always supported strong standards to defend our children and their health—over 92,000 Pro-life Christians, more than any other group. In closing, I would like to share the words of 92,000 pro-life Christians, primarily from Pennsylvania, Colorado, and New Mexico, to the EPA back in 2015. Their request states:

As pro-life Christians, we want the air that we breathe to be safe for our children. Leaks in our natural gas infrastructure spew out toxic pollutants, cancer-causing agents and climate pollution that place God's creation and our families - especially children, pregnant mothers, and the unborn - in harm's way. That's why we call on The Environmental Protection Agency and all our policy makers to support strong regulations to cut this pollution from both new and existing leaks from our natural gas infrastructure. Our children deserve nothing less.

¹² See EPA Natural Gas STAR Program (2011), *Options for Removing Accumulated Fluid and Improving Flow in Gas Wells*, (available at <https://www.epa.gov/natural-gas-star-program/options-removing-accumulated-fluid-andimproving-flow-gas-wells>).

Research indicates that 80% of natural gas leaks originate from just 30% of the facilities.¹³ That suggests that many producers already see the value in minimizing leaks and production losses. Escaping methane gas can't make a profit, but it can be highly toxic and of immeasurable value to our children's health.

However, it also shows that lower-cost operators, without proper care or sound capitalization, run on the margins. While being sympathetic to small business owners, the current threats to children's health demand adequate accountability. Supporting a new standard creates, in effect, a police force to ensure our kids' health.

If we care for our children, now and in the future, let's work together to develop a strong methane standard to protect all of God's creation.

Defending the life and health of our children is paramount.

With Sincere Blessings,

A handwritten signature in cursive script that reads "Mitchell C. Hescox". The signature is written in dark ink on a light background.

The Rev. Mitchell C. Hescox

¹³ Austin L. Mitchel, et.al, Measurements of Methane Emissions from Natural Gas Gathering Facilities and Processing Plants: Measurement Results, Environ. Sci. Technol. 2015, 49, 3219–3227. Downloaded on September 28, 2015, <http://pubs.acs.org/doi/pdf/10.1021/es5052809>

Supplemental Information to be included as part of my testimony.

Below is a short, real-life true story of a leaking, low-producing gas well in Western Pennsylvania. My colleague and friend, Melissa Ostroff from EARTHWORKS, captured this OGI [video](#) on July 16, 2022. Ms. Ostroff is a Certified Optical Gas Imaging Thermographer, and here are the facts in Melissa's own words.

"My name is Melissa Ostroff, and I am a certified optical gas imaging thermographer and public health professional with Earthworks. On Saturday, July 16th, I joined community members for a walk-through of Boyce Park in Allegheny County, Pennsylvania. While in the park, we noted a strong odor of hydrocarbons and eventually found the source: a marginal well owned by Diversified Production LLC. This FLIR optical gas imaging video of the well site shows continuous methane and volatile organic compound emissions emanating from the well and into the open air, indicating a serious equipment issue and a potential hazard to public health.

The trails surrounding this well were populated by runners, cyclists, and families with children taking a walk in the otherwise pristine wooded environment. The emissions shown in the video had been occurring for an unknown amount of time, but DEP production data indicate a precipitous drop in production in 2021, which may or may not be related to when this leak began. We do not know when the site was last inspected before our visit or how long these emissions were pouring into the air where families recreate."