

September 21, 2022

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

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CFR Citation: 40 CFR 60 40 CFR 60 subpart OOOOa

Title: Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review

Dear OIRA:

My name is Lindsay Garcia. I'm the Director of Communications for the Evangelical Environmental Network and Young Evangelicals for Climate Action, and I live in Denver, Colorado. I grew up about fifty miles north of where I live now, in the town of Greeley. In high school, one of my favorite ways to spend a Saturday morning was to get up early, hop on my bike, and ride the trail that ran along the river between Greeley and the nearby town of Fort Collins. One Saturday, however, something on the trail changed. A tall, temporary wall had been built up against the edge of the popular bike path, partially obscuring the new oil and gas production site on the other side.

This was just the first of many sites that would appear over the next few years, crowding—and sometimes even rerouting—my favorite bike route. Rural bike paths weren't the only place these sites surfaced. A large fracking tower appeared my senior year within view of the stadium where I would graduate, the same stadium where kids in my school district would practice sports and gather for the largest high school football game of the year.

At the time, I thought these sites were just noisy eye sores, unfortunate for anyone who had a view of them from their backyard. Now, I know that living near an oil and gas site has much greater consequences, particularly on children's health. In Weld County, the county where I grew up and where many of my friends and family still live, over 170,000 people live within a half mile of an active oil and gas well, and that number includes over 46,000 children who are at risk.<sup>1</sup>

I am thankful that the EPA's proposed rule will defend children's health from dangerous methane pollution. I am glad it will protect Colorado kids who—like me—love spending time outside, enjoying the natural beauty of our state. Still, this rule does not go far enough to address pollution from routine flaring or require frequent enough inspections of low-producing wells that still have a great impact on air quality.

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<sup>1</sup> <https://oilandgasthreatmap.com/>

In addition to its effects on human health, methane poses a serious risk to Coloradans as a major contributor to rising temperatures and extreme weather, both of which are a reality that are becoming more and more difficult to ignore in everyday life.

Before my time at EEN, I held positions as both a ranger and a private tour guide in Rocky Mountain National Park. Nearly every day, the experience of sharing the beauty of Colorado with visitors from around the world was tainted by explaining the impacts of warming temperatures on Colorado's pine beetle infestation, seeing low water levels due to drought, driving through areas devastated by recent wildfires, and apologizing for our famous mountain views being obscured by smoke and smog. One day, some visitors even opted to wear masks outdoors, as Denver had some of the worst air quality in the world due to wildfire smoke, heat, and ozone.

Fortunately, Colorado has already taken action to address methane pollution, being one of the first states to ban routine flaring except in emergency situations. The EPA must follow our lead by eliminating flaring; putting greater controls on low-producing wells; and ending the use of intentionally polluting equipment, including requiring zero-emitting pneumatic controllers and pumps. These measures will protect the health of our children and communities and decrease the impact of methane on our rapidly warming climate. Let's care for our neighbors and steward creation well by cutting pollution with the strongest possible methane standards.

Sincerely,

Lindsay Garcia

Denver, CO