



Meeting with Office of Management and Budget
Re: E.O. 12866 - EPA oil and gas supplemental rulemaking
September 22, 2022

Public Comment from Healthy Air & Water Colorado

We are excited to meet with you today about the upcoming EPA oil and gas rulemaking and are here to offer testimony from Colorado, New Mexico, Utah, and Pennsylvania. Our organizations have long been advocating for equitable responses to the health impacts of pollution and climate change.

My name is Megan Kemp, and I am the Advocacy Manager of Healthy Air & Water Colorado - a bipartisan nonprofit that works to mitigate the impacts of climate change on public health through policy. We rely on a member base of over 1400 health professionals across our state to advocate for protecting health from climate change, because the climate crisis is a health crisis.

We are meeting with you today because we care deeply about the health of our communities, and communities across our country continue to breathe in polluted air and suffer from the impacts of climate change, exacerbated by methane emissions. We want to thank you for taking our meeting and for being open to hearing what we have to say about the urgency of protecting health from methane emissions nationwide.

While we are hopeful about the important steps the EPA is taking in reducing methane and other harmful air pollutants from new and existing sources in the oil and gas industry, and while the proposed Clean Air Act rule includes many important safeguards like phasing out intentionally-polluting equipment by requiring zero emitting pneumatic controllers, it does not go far enough to address pollution from unlit flares or require frequent enough inspections of covered sources.

New [geospatial analysis released](#) by Earthworks and FracTracker shows that more than 17.3 million people, including 3.9 million children under 18 reside within a half mile health threat radius of active oil and gas production operations. Toxic pollutants released alongside methane, such as benzene, can worsen asthma and other respiratory diseases, increase [the risk of heart attacks](#) and cardiovascular diseases, increase the risk of cancer, cause immune system damage, and even developmental problems in children. Living near unconventional oil & gas wells has been shown to [shorten life spans](#) for residents 65 and older.

Additionally, there are important implications for environmental justice associated with strengthening the EPA Clean Air Act Rule. Several studies show there are many counties throughout the U.S. where there is an overlap of high density oil and gas development and



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communities of color and people living below the poverty line. Some studies have shown communities of color that bear a disproportionately high exposure to flaring operations.

We are asking that a supplemental proposal from EPA builds on their initial rulemaking to ban routine flaring, eliminate potential loopholes that allow smaller wells with leak-prone equipment to forgo regular inspections, require oil and gas operators to use non-emitting equipment, and empower community groups to monitor emissions at the sites in their own backyards. **Colorado set the standard for methane regulations, and it's time for the rest of the US to follow our example.** The EPA must follow the lead of states like Colorado and New Mexico and move to eliminate routine flaring except in emergency situations.

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