



October 2, 2025

Lee Zeldin, Administrator

U.S. Environmental Protection Agency

William J. Clinton Building

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Re: Comments on EPA's Section 111 Compliance Deadline Extension– Docket ID No. EPA-HQ-OAR-2021-0317

Dear Administrator Zeldin,

The undersigned health organizations strongly oppose the delay of critical compliance deadlines for reducing methane emissions under Clean Air Act Section 111. This delay will undermine urgently needed protections that limit methane and other harmful pollutants from the oil and gas industry. We urge EPA to reverse the deadline extension and move swiftly to fully implement the methane standards that were finalized in 2023.

The stakes for public health are enormous. Emissions from the oil and gas sector include a dangerous mix of pollutants, including volatile organic compounds (VOCs), known carcinogens such as benzene and formaldehyde and particulate matter. Collectively, these pollutants drive asthma attacks, hospital visits, cancer risks and even premature deaths. EPA's own analysis shows that the commonsense 2023 methane rule would prevent up to

1,500 premature deaths and 100,000 asthma attacks each year. A delay in implementing that rule means more preventable health harms.

VOCs also contribute to the formation of ground-level ozone, or smog, which exacerbates respiratory conditions and triggers hospital visits, especially for children, seniors and people with preexisting health conditions. The American Lung Association's 2025 "State of the Air" report found that more than 125 million people in the U.S. live in counties that had failing grades for ozone pollution.¹ Delaying implementation of this rule would only exacerbate the problem. When finalizing the rule, EPA projected that the 2023 methane standards would prevent 3.8 million tons of methane, 960,000 tons of VOCs, and 36,000 tons of toxic air pollution over the next decade. Those are lifesaving reductions that we cannot afford to delay.

Methane emissions, particularly from abandoned and underregulated oil and gas wells, represent a significant and preventable threat that is accelerating global warming. Methane is over 80 times more potent than carbon dioxide over a 20-year period and is a major driver of climate change.² In the face of mounting climate impacts, from record-breaking heatwaves and wildfires to destructive floods and prolonged droughts, delaying action is unacceptable. Climate change is a public health emergency. It increases the frequency and severity of extreme weather events, worsens air quality, extends allergy seasons and increases the risk of spreading vector-borne diseases like Lyme disease and West Nile virus, among a much broader range of amplified health risks.

Additional health impacts are associated with oil and gas production. A 2020 study of pregnant women living in the Eagle Ford Shale area of Texas found that exposure to oil and gas emissions was associated with a 50 percent increase in the risk of preterm birth.³ Preterm birth is a leading contributor to infant death in the U.S. Children are also particularly vulnerable to health harms from both VOCs and ozone due to their faster breathing rate, proportion of time spent outside and their still-developing lungs. A Yale School of Public Health study found that children living near unconventional oil and gas

¹ [Ozone Pollution Trends | State of the Air | American Lung Association](#)

² Stanford University. Doerr School of Sustainability. Methane and climate change. November 2021. [Methane and climate change | Stanford Doerr School of Sustainability](#)

³ Cushing, L. J., Vavra-Musser, K., Chau, K., Franklin, M., & Johnston, J. E. (2020). Flaring from unconventional oil and gas development and birth outcomes in the Eagle Ford Shale in South Texas. *Environmental Health Perspectives*, 128(7). doi: 10.1289/EHP6394

developments at birth were two to three times more likely to be diagnosed with leukemia between the ages of two and seven than those who did not live near an oil and gas facility.⁴

Delaying these commonsense methane protections also risks halting momentum in an industry that has already demonstrated the feasibility and cost-effectiveness of reducing methane emissions. It creates regulatory uncertainty for companies that are investing in innovative leak detection and mitigation technologies. Further, the delay jeopardizes the growing methane mitigation workforce, an emerging sector that provides jobs while helping tackle one of the most potent climate pollutants.

The [national health community](#) as well as [state and local health organizations](#) celebrated the finalization of the 2023 methane rule because of the health benefits – both immediate and long-term – that were estimated. The long overdue standards represent a vital opportunity to protect public health, strengthen the response to climate change and support job growth. Every day of delay is a lost opportunity to cut dangerous pollution, improve air quality and secure a healthier future for all.

We urge EPA to reverse course on the extension and implement these lifesaving methane safeguards on schedule and without delay.

Signed,

Alliance of Nurses for Healthy Environments

American Academy of Pediatrics

American College of Obstetricians & Gynecologists

American College of Physicians

American Lung Association

American Public Health Association

American Thoracic Society

Asthma and Allergy Foundation of America

Children's Environmental Health Network

⁴ Cassandra J. Clark, Nicholas P. Johnson, Mario Soriano Jr, Joshua L. Warren, Keli M. Sorrentino, Nina S. Kadan-Lottick, James E. Saiers, Xiaomei Ma, and Nicole C. Deziel 2022. "Unconventional Oil and Gas Development Exposure and Risk of Childhood Acute Lymphoblastic Leukemia: A Case–Control Study in Pennsylvania, 2009–2017" *Environmental Health Perspectives* doi.org/10.1289/EHP11092

Climate Psychiatry Alliance

Clinicians for Climate Action NJ

Health Care Without Harm

International Society for Environmental Epidemiology, North America Chapter

Medical Society Consortium on Climate and Health

Medical Students for a Sustainable Future

Mothers & Others for Clean Air

National Association of Pediatric Nurse Practitioners

National League for Nursing

Physicians for Social Responsibility