

Testimony from Liz Scott
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EPA Public Hearing on “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 Final Rule”

Docket ID: EPA-HQ-OAR-2025-0162; FRL-12675-01- OAR

As prepared for delivery

Hello. My name is Liz Scott and I’m the Director of Federal Clean Air Advocacy at the American Lung Association. The American Lung Association is the nation’s oldest voluntary health organization and our vision is a world free of lung disease. In order to achieve that vision, we know that addressing air pollution is critical. Which is why we are incredibly disappointed that this EPA has delayed the deadlines to comply with a critical safeguard that limits pollution from oil and gas operations. I urge the EPA to withdraw this rule and move forward with the original compliance deadlines.

Oil and gas facilities are the second largest source of methane emissions – a powerful climate pollutant – and the sector with the most potential for clean-up. Methane has more warming potential than carbon, which is why reducing methane emissions has become a global priority to help prevent a worsening of climate change impacts. The United Nations Environment Programme or UNEP declared that goals of limiting warming to 1.5 degrees Celsius would be impossible to achieve without drastic reductions in methane. This is not just numbers – climate change is already impacting communities in the United States. Just this year, the nation has seen deadly wildfires and flooding and streaks of excessive heat. All of these disasters were amplified because of climate change, which is being accelerated by methane.

We have precious little time to act if we are to prevent these deadly disasters from becoming even more frequent and intense. While it is true that methane emissions in the US have seen a downward trend in the past few decades, they are still far too high, and we cannot afford to reverse our progress by lifting requirements that the industry address these emissions. We also know that methane emissions are often underreported. The International Energy Agency has estimated global methane emissions that are 80% higher than those reported by countries to the UN Framework Convention on Climate Change. The 2023 rule limiting methane emissions from new and existing oil and gas sources were estimated to prevent 58 million tons of methane in the US from 2024 to 2038. By delaying compliance with the rule, EPA is admitting that at least 3.8 million tons of methane will be

emitted from existing sources alone – emissions that could have otherwise been prevented.

Delaying the compliance deadlines is also completely unnecessary as states are already in the process of implementing the rule. Some are already well into the process of incorporating existing source standards into state implementation plans. This also means that companies have already made investments to meet the standards. While we can hope that companies would continue to work towards complying with the standards, too often we see examples of companies shutting off pollution controls when they are no longer required to run them – leaving communities to bear the brunt of worsened air pollution and accelerating climate disasters.

Every day, week, month and year delay of reducing emissions is another day, week, month and year that polluters perpetuate the problem of climate change, leaving public health in the balance. I urge EPA to withdraw this rule which is in direct conflict with EPA's stated mission of protecting human health and the environment.