



1400 Eye Street NW Suite 450 | Washington DC 20005 | t. 202.657.0670 | f. 202.657.0671 |
www.firstfocus.org

February 23, 2023

Administrator Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

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

Dear Administrator Regan,

On behalf of First Focus on Children, thank you for the opportunity to comment on the proposed rule concerning Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review. First Focus on Children is a bipartisan children's advocacy organization dedicated to ensuring children and families are a priority in federal policy and budget decisions. As advocates for children, we are deeply committed to ensuring that all of our nation's children are able to flourish in a healthy environment. Methane is a potent greenhouse gas that contributes to climate change, and it is essential that we take action to reduce emissions from these sources. By strengthening our detection methods and response to methane leaks in both old and new natural gas and oil wells, we can mitigate the potential health risks associated with exposure to methane and other harmful chemicals and reduce the impact of these leaks on our climate.

Changes to Proposed Emissions Standards

First Focus strongly supports the supplemental proposal announced by the U.S. Environmental Protection Agency (EPA) updating its November 2021 proposal. Strengthening the monitoring approach to leaks from oil and natural gas wells is an evident mitigator for unwanted methane emissions and other forms of air pollution. It is also essential for protecting the health of children and families living near these facilities. By continuously inspecting facilities based on their on-site equipment rather than estimated emissions, the EPA is taking a step in the right direction for combating climate impact and promoting a bright future for our nation's children. Additional revisions to the November 2021 proposal acknowledge the contribution of abandoned oil and natural gas wells on emissions. First Focus supports the continued monitoring of oil and natural gas facilities well after their usage. With this new proposal, the EPA will make it easier to identify further methane leaks and other pollutants that contribute to climate change.

Establishing a Super Emitter Response Program

The supplemental proposal by the EPA would also establish a Super-Emitter Response Program that requires the owners of these facilities to investigate significant leaks and allow the EPA to publish the results and their responses publicly. First Focus supports this program because transparency and accountability are critical to ensuring that companies are doing their part to protect the health of our children and the environment they enjoy. This program would help to ensure that they are held responsible for their actions. Methane leaks are not

just a problem for our health, they also have a significant impact on our planet's climate. Methane is a potent greenhouse gas that traps heat in the atmosphere and contributes to global warming. By implementing this program and responding to leaks in a timely and responsible manner, the EPA can reduce emissions and slow down the pace of climate change, helping to create a safer and healthier world for our children.

Conclusion

First Focus wants to ensure that the health and safety of children are a top priority at every step of the rulemaking process. The implementation of heightened emission standards and the Super Emitter Response Program for monitoring leaks at oil and natural gas wells will promote the health and safety of children, reduce emissions, and mitigate the impact of these leaks on our climate. Thank you for the opportunity to comment on this important supplemental proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Bruce Lesley". The signature is written in a cursive style with a prominent "L" and "S".

Bruce Lesley
President, First Focus on Children