

**Oral and Written Testimony of Dr. Elizabeth Del Buono, member of the Environmental Law & Policy Center and Interim Executive Director and Board Chair of Michigan Clinicians for Climate Action (MiCCA),
Public Hearing on U.S. Environmental Protection Agency's 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 Interim Final Rule**

Docket ID No. EPA-HQ- OAR-2025-0162
September 2, 2025

Hello, my name is Doctor Elizabeth DelBuono. I am a retired diagnostic pathologist and the Interim Executive Director and Board Chair for Michigan Clinicians for Climate Action (MiCCA). I am also a member of the Environmental Law and Policy Center.

I strongly oppose EPA's interim final rule because it unnecessarily delays the compliance deadlines for important emissions control and monitoring provisions contained in EPA's final rule, published on March 8, 2024.

EPA's interim final rule will unnecessarily prolong the emissions of hazardous air pollutants, methane and volatile organic compounds (VOC's) to the detriment of Michiganders. This is especially concerning given the high concentration of oil and natural gas wells in Michigan. In Grand Traverse County alone, where I live, there are 1747 active wells as calculated by the Environmental Defense utilizing Enverus Prism wells dataset and active rigs dataset available at <https://www.enverus.com>. See also Proville-Mirtich declaration in the ongoing case in the D.C. Circuit Court of Appeals *EDF v. EPA*, Case No. 25-1164, Doc. No. 2130555, pgs. 244-261.

If the deadlines in the original 2024 Rule were enforced, the pollutants from these wells would be reduced and air quality improved. Unfortunately, this interim final rule delays those reductions and negatively impacts my health, the health of my family, and the residents of Michigan.

As a retired physician who practiced for approximately 30 years, I am well aware of the impact that such pollutants can have on our bodies. For example, volatile organic compounds and smog worsen asthma and respiratory disease, cause nervous system and developmental harm, and cause cancer. Children are especially vulnerable.

These impacts are tangible and can be avoided with improved air quality. The compliance deadlines in the original 2024 Rule were a step in the right direction to improving air quality. There is no rational reason EPA should delay that Rule's effectiveness.

At MiCCA, we work to bring attention to the adverse health impacts of climate change. To quote our parent organization, The Medical Society Consortium on Climate and Health, "Climate change is a health emergency: Our member physicians are seeing the health impacts of climate change in their patients every day and (these harms) are worsening with every increment of increased warming. To avoid catastrophic climate change, we must reduce methane and other climate emissions as quickly as possible." See

<https://medsocietiesforclimatehealth.org/statements/consortium-statements/consortium-statement-epa-supplemental-proposal-reduce-methane-pollutants-oil-gas-industry/>.

At MiCCA we collect first-hand accounts of climate-health impacts from health professionals and community members throughout Michigan.

- For example, one of MiCCA's members is a nurse practitioner from the Traverse City area. Over the past summer, as air quality has worsened from wildfire smoke coming down from Canada, she has developed intractable coughing spells. This has forced her indoors most of the summer and she has had to resort to wearing a mask any time she ventures outside.
- Another example was told by a University of Michigan medical student who recounted the time that an unhoused veteran with PTSD became confused during an extreme heat event, missing an appointment and ultimately required hospitalization. We know that extreme heat often exacerbates unsafe conditions for homeless and mentally ill people, whose medications often become less effective when temperatures rise.

These are just a couple of examples, but there are many more available on our website: *See* <https://www.michigancca.com/blank>.

EPA's original 2024 Rule would improve air quality, reduce methane emissions and help to mitigate climate change thereby avoiding some of the awful scenarios described above. I urge the EPA to retract its interim final rule which would threaten human health and undermine the goals of the original 2024 Rule. Thank you.