

Comments of Paula Leach, Member of the Environmental Law & Policy Center, 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

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Hi my name is Paula Leach. I live on Torch Lake in Antrim County Michigan, and I am testifying today as a member of the Environmental Law & Policy Center. I strongly oppose the EPA's interim final rule which is the subject of today's hearing. The interim final rule unnecessarily delays the compliance deadlines for important methane emissions control and monitoring provisions contained in the EPA's March 8, 2024 final rule. Any delay of these crucial emissions control standards and monitoring requirements will negatively impact my health, the health of my family, and the climate.

I recently became aware of the significant presence of oil and gas wells near my property, which makes me more worried than ever about the air pollution they produce. According to an analysis by Environmental Defense Fund utilizing Enverus Prism wells dataset and active rigs dataset available at <https://www.enverus.com>, just within 5 miles of my home, there are 70 active wells, built after December 2022 meaning they are subject to the March 8, 2024 final rule. 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. But for this interim final rule, those wells would have reduced emissions of volatile organic compounds, methane, and hazardous air pollutants. Sticking with the deadlines in the 2024 rule would have reduced my family's exposure to these dangerous pollutants. I am worried for our health, especially since I have a new grandchild. Our family thoroughly enjoys the outdoors. During the summer, we swim, bike, kayak, and boat in the Torch Lake watershed, and we cherish the pristine environment that makes these activities so special. In the wintertime, we cross country ski and snowshoe. The Torch Lake watershed is beautiful and we feel privileged to be stewards of this land. I do not want to see it devalued due to toxic methane emissions from the oil and gas industry.

The delay in the deadlines set forth in the 2024 final rule will be harmful to the climate as a result of increased methane emissions that otherwise would not occur and to human health due to increased volatile organic compound and hazardous air pollutant emissions that otherwise would not occur. This is disappointing because my family would have enjoyed cleaner air in our community if the 2024 Rule were enforced on its original timeline.

There is no reason to delay. I urge the EPA to please withdraw the interim final rule and stick with the 2024 final rule. Reductions of methane, volatile organic compounds and hazardous air pollutants will lead to improved local air quality in places like Antrim County and will help mitigate climate change impacts that threaten the natural beauty and livability of my community and many other communities across this country and the globe. The oil and natural gas industry contributes significantly to climate change which is producing myriad other impacts that affect my life negatively. For example, the recent wildfires in Canada have significantly impaired the air quality I breathe. The EPA recognizes that methane is a potent greenhouse gas which contributes to climate change and that wildfires are being exacerbated by climate change.

Simply being outside this summer has been difficult because of the wildfires. I get sore throats when I am out there and the air is so dirty I am not able to see the beautiful views I normally can.

The EPA's 2024 Rule setting deadlines to curtail methane emissions and reduce ozone is a crucial step toward reducing harmful pollution and safeguarding the environment for future generations. This EPA interim final rule is a big step backwards to achieving these goals. I oppose this new delay and urge EPA to stand by protecting human health and the environment by preserving and enforcing the deadlines in the 2024 Rule to ensure that methane, volatile organic compound, and hazardous air pollutant emissions reductions are realized sooner and the health risks to me and my family can be minimized now and in the future.