

**Comments of Wendy Bloom, Senior Attorney, 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
September 2, 2025

Good afternoon. I’m Wendy Bloom, a Senior Attorney at the Environmental Law & Policy Center. At ELPC we work to protect the Great Lakes, defend the Midwest’s wild and natural places and advocate for healthy clean air and water for all. Our ELPC members reside in rural, urban and suburban areas throughout the Midwest; they enjoy outdoor recreation of all sorts on streams, rivers, lakes and in nature, in cities and on their own property.

Today, we urge EPA to withdraw its Interim Final Rule published on July 31, 2025, [90 Fed. Reg. 35,966](#) (July 31, 2025), and honor its commitment to reduce air pollution by leaving in place the deadlines for oil and natural gas operators and states to comply with methane emission reduction requirements set forth in the EPA’s final rule published on March 8, 2024, [89 Fed. Reg. 16,820, 16,826-27](#) (March 8, 2024).

Due to the significant presence of oil and natural gas wells and processing plants throughout our Midwestern states, we Midwesterners were set to benefit greatly from the deadlines in EPA’s 2024 Rule. *See* EPA, Regulatory Impact Analysis of the Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review, EPA-425/R-23-013 at 3-3 (December 2023), available at https://www.epa.gov/system/files/documents/2023-12/eo12866_oil-and-gas-nsps-eg-climate-review-2060-av16-ria-20231130.pdf.

With respect to our health, according to detailed mapping in EPA’s own Regulatory Impact Analysis for its 2024 Rule, significant reductions in ozone concentrations across the Midwest will occur by 2028, but only if EPA enforces the compliance deadlines in the 2024 Rule. *See Id.* at 3-30, Figure 3-2. By EPA’s own admission, if the 2024 Rule deadlines are implemented on schedule, we will experience meaningful reductions in asthma rates, emergency department visits for respiratory conditions, and premature deaths from respiratory ailments. *Id.* Instead of protecting the air we breathe, EPA’s Interim Final Rule extending the deadlines in the 2024 Rule does the opposite.

With respect to our climate, EPA acknowledged in its Regulatory Impact Analysis for the 2024 Rule, that if the deadlines in the 2024 Rule are enforced, methane emissions will decrease by approximately 130 million metric tons between 2024 and 2029. *See Id.* at 3-4. EPA also admits climate change is real; as the report states, “Methane is the principal component of natural gas. Methane is also a potent greenhouse gas (GHG) that, once emitted into the atmosphere, absorbs terrestrial infrared radiation, which, in turn contributes to increased global warming and climate change. Methane reacts in the atmosphere to form ozone, which also impacts global temperatures.” *Id.*

We see and feel the consequences of climate change in the Midwest right now and these consequences are getting worse. This year, ELPC published an update to an assessment of the impacts of climate change on the Great Lakes prepared by scientists and research experts from universities in the Great Lake region that ELPC published in 2019. See ELPC, 2025 Update An Assessment of the Impacts of Climate Change on the Great Lakes, (2025), available at https://elpc.org/wp-content/uploads/2025/07/ELPC_ClimateChangeUpdate_Final2025.pdf; see also ELPC, An Assessment of the Impacts of Climate Change on the Great Lakes, (2019), available at https://elpc.org/wp-content/uploads/2025/07/ELPC-ClimateChangeReport2019Refresh_2025.pdf.

As detailed in this 2025 update, the Great Lakes are warming; we have fewer cold nights; we have more extreme precipitation; and our urban areas are hotter. *Id.* We are talking about more than 40 million people who live in the Great Lakes watershed who rely on the Great Lakes for drinking water, fisheries, recreation, commerce and industry, all of which are impacted by this climate change. We are seeing harmful algal blooms in our waters throughout the basin. Great Lakes whitefish populations are in decline; trout are at risk. Heat waves and increased humidity in our Great Lakes region amplify the risks of heat-related deaths and illnesses, and respiratory diseases.

All of these harmful impacts to human health and the environment from climate change will continue to worsen in the Midwest if the deadlines set in the 2024 Rule are extended, as EPA proposes to do in the Interim Final Rule.

The compliance deadlines for oil and gas producers and states set forth in EPA's 2024 Rule are based upon extensive public comment and careful balancing of administrative record evidence regarding technical feasibility, cost and public health benefits. There were two rounds of notice and comment over a three-year period. Oil and gas trade groups and companies and states participated, as did ELPC, many other organizations and members of the public. 86 Fed. Reg. 63,110 (Nov. 15, 2021); 87 Fed. Reg. 74,702 (Dec. 6, 2022). Consequently, these 2024 Rule deadlines should remain in place.

EPA's Interim Final Rule threatens the public health of Midwesterners and our environment because the Rule will postpone much needed reductions in air pollutants. The compliance deadlines for the technology control and monitoring provisions of EPA's 2024 Rule are sensible and important. We urge EPA to support healthy air and to stand with the public by withdrawing the Interim Final Rule. Thank you for your consideration.