

Testimony – January 12, 2023

EPA's Supplemental Proposal and Natural Gas Industry to Reduce Pollution from the Oil and Natural Gas Industry to Fight the Climate Crisis and Protect Public Health

Docket ID No. EPA-HQ-OAR-2021-0317.

**Good afternoon. Nancy Boxer, Association for Climate Health. Thank you for letting me speak today.**

First, I want to thank the EPA for proposing further regulation of dangerous VOC and methane emissions. VOCs create smog which threatens public health; methane is the biggest part of natural gas, and while CO<sub>2</sub> is the major cause of climate change, methane is smaller but mightier. It is the Napoleon Bonaparte of greenhouse gases, leaving devastation in its small but potent path.

As with any proposed change, there may be resistance from people who don't want to pay more, or risk losing value in their assets if asked to change how they do business. Yes, jobs and profits may be at risk. Producers may claim they do fine, policing themselves, and argue, why would they allow much leakage of this valuable product?

The answer is that it costs more to repair pipelines or refit wells than to lose the gas leaking out right now. It is more profitable to ignore losses, even when they poison drinking water or make children sick at nearby schools, as happened in my home state, Pennsylvania; even when these emissions threaten world food supplies, coastlines and national security due to global warming.

Yes, some jobs may be lost, and dividends may be cut. I'm a shareholder, and I respect the pain this represents. But when a contractor lets their supplies spill into the streets, we make them clean it up. Why? Because it is **wrong** to let business create a public hazard. *(Pause)* If a drug company makes medication with life-threatening side effects, we make them take it off the market until they can make the product **without** sickening people. The oil and gas industry should be no different.

Yes, there will be costs. But we all bear costs for the sake of public safety. Children must be immunized before they start school; homeowners must comply with fire and electric codes even though it costs more. Businesses must maintain safe workplaces and produce products **without** endangering the public. Even if such requirements make them **less** profitable or occasionally, drive them out of business.

And so it is with these regs – they should be imposed to protect all of us – employees, shareholders, ordinary citizens. To **fail to do so** threatens the safety and welfare of our own and future generations.

We support the proposed regulations. But we urge EPA to go even further in writing and administering them:

1. Prioritize going after super-emitters to cap them and shut them down
2. Prioritize getting funds from the owners and operators of wells, pipelines, etc. who should cover the cost for mitigating emissions, and no longer be able to just walk away
3. We propose **removing** the exemption for sites with no access to electricity, when today any site can install solar panels or windmills to power their equipment
4. We suggest random assignment of inspectors and random audits of monitoring systems to reduce the risk of corruption
5. We suggest requiring follow-up inspections 6 months or a year after the final survey of closed wells to monitor the integrity of closure.

Thank you for your time.