



individual level to protect health from outdoor air pollution. Enforceable rules to limit leaking of toxic air pollutants and climate pollutants like methane will immediately benefit public health in communities across the country and help stave off catastrophic effects of climate change.

Methane is a highly potent greenhouse gas that is accelerating climate change. Climate change poses threats to the ability of health professionals to help the public and deliver life sustaining care. It also increases the number of people who seek medical care or assistance by lengthening allergy seasons, increasing vector borne illnesses and making air pollution worse. To truly realize a healthier future for all, we must drastically reduce the emissions that are perpetuating climate change.

A strong rule will also reduce the emissions of harmful pollutants that are released alongside methane at oil and gas sites. Volatile organic compounds (VOCs) include gases identified as hazardous air pollutants such as benzene, toluene and formaldehyde, among others. Benzene and formaldehyde are known human carcinogens. Ethylbenzene, another hazardous pollutant from oil and gas emissions, is a probable carcinogen. In addition to these dangers, VOCs also interact with other emissions in the presence of sunlight to form ground-level ozone pollution. Ozone, or smog, can worsen asthma, increase hospital visits, and contribute to low-birth weight (a leading cause of infant death) and premature death.

The updates made in this supplemental proposal strengthen the rule from EPA's original proposal in some areas – including advanced leak detection and repair standards, requiring zero-emission pneumatic controllers and pumps and requiring the cleanup of more abandoned wells. We urge EPA to strengthen the proposal further by requiring operators of oil wells to better protect public health by limiting routine flaring of associated gas to safety or maintenance episodes. We also ask that EPA ensure the Super Emitter Response Program, which is designed to identify and address large leaks, includes clear and accessible pathways for communities and individuals to engage in holding polluters accountable.

As health organizations, we recognize the dangers of air and climate pollution and the benefits that will be experienced by all if the nation takes significant steps to reduce emissions and lessen the use of fossil fuels. This proposal by EPA to limit pollution from the oil and gas sector is needed to provide relief to communities that have been overburdened by dangerous pollution. We urge EPA to finalize the strongest possible rule by no later than August 2023.

Sincerely,

American College of Physicians, Wisconsin Chapter

American College of Physicians, California Chapter Services

American Nurses Association - New York

Arkansas Public Health Association

Asthma & Allergy Foundation of America - Michigan Chapter

California Chapter 1, American Academy of Pediatrics  
California Chapter 3, American Academy of Pediatrics  
California Nurses for Environmental Health and Justice  
Climate Health Now  
Colorado Chapter, American Academy of Pediatrics  
Colorado Public Health Association  
Delaware Academy of Medicine / Delaware Public Health Association  
Delaware Chapter, American Academy of Pediatrics  
Delaware Nurses Association  
Florida Chapter, American Academy of Pediatrics  
Florida Public Health Association  
Hawaii Public Health Association  
Illinois Chapter, American Academy of Pediatrics  
Illinois Public Health Association  
Indiana Public Health Association  
Iowa Chapter, American Academy of Pediatrics  
LifeLong Medical Care  
Long Beach Department of Health  
Louisiana Chapter, American Academy of Pediatrics  
Louisiana Public Health Association  
Maine Chapter, American Academy of Pediatrics  
Maine Public Health Association  
Maryland Chapter, American Academy of Pediatrics  
Massachusetts Chapter, American Academy of Pediatrics  
Maternal and Child Health Access  
MI Air MI Health  
Michigan Clinicians for Climate Action  
Michigan Public Health Association

Minnesota Public Health Association  
Mississippi Chapter, American Academy of Pediatrics  
Montana Chapter, American Academy of Pediatrics  
NC Public Health Association  
Nebraska Chapter, American Academy of Pediatrics  
Nemours Primary Care  
Nevada Chapter, American Academy of Pediatrics  
Nevada Public Health Association  
New Hampshire Chapter, American Academy of Pediatrics  
New Mexico Chapter, American Academy of Pediatrics  
New York Chapter 1, American Academy of Pediatrics  
New York Chapter 2, American Academy of Pediatrics  
New York Chapter 3, American Academy of Pediatrics  
New York State Public Health Association  
NJ Public Health Association  
North Dakota Public Health Association  
Northwest Regional Primary Care Association  
Oklahoma Public Health Association  
Oregon Pediatric Society  
Pacifica Family Maternity Center  
Pediatricians Alliance of Ontario, Ontario Chapter, American Academy of Pediatrics  
Pennsylvania Chapter, American Academy of Pediatrics  
Pennsylvania Public Health Association  
Regional Asthma Management and Prevention  
Rhode Island Chapter, American Academy of Pediatrics,  
Rhode Island Public Health Association  
San Francisco Bay Physicians for Social Responsibility  
South Carolina Chapter, American Academy of Pediatrics

Texas Physicians for Social Responsibility

Utah Chapter, American Academy of Pediatrics

Utah Public Health Association

Virginia Chapter, American Academy of Pediatrics

Wisconsin Asthma Coalition

Wisconsin Health Professionals for Climate Action