U.S. ENVIRONMENTAL PROTECTION AGENCY Zoom Virtual Public Hearing

Virtual Public Hearing on Proposed Regulation to Implement the Waste Emissions Charge for Petroleum and Natural Gas Systems

9:00 AM - 7:30 PM Eastern

Monday, February 12, 2024

List of EPA Hearing Chairs and Panelists:

Sharyn Lie, Hearing Chair (Session 1)

Melissa Weitz, Hearing Chair (Sessions 2 and 4) and Panelist (Session 5)

Pye Russell, Hearing Chair (Sessions 3 and 5)

Erin McDuffie, Panelist (Sessions 1 and 4)

Sarah Busch, Panelist (Session 1)

Jameel Alsalam, Panelist (Sessions 2 and 4)

Amy Hambrick, Panelist (Session 2)

Grace Weatherall, Panelist (Session 3)

Akshay Delity, Panelist (Session 3)

Sharay Jackson-Dixon, Panelist (Session 4)

Jennifer Bohman, Panelist (Session 5)

Transcription details:

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Transcription Results:

Speaker:	Transcription:
Sharyn Lie 00:00:03	Morning, my name is Sharyn Lie, and I am the Director of the Climate Change Division in the Office of Atmospheric Protection. I will be chairing this session of today's public hearing. Thank you for coming today. Before beginning, we'd like to run through a few administrative items. I'll turn it over to Kellie Dubay with ERG, who is helping support today's session.
Kellie DuBay 00:00:26	Thanks Sharyn. Thanks everyone. My name is Kellie Dubay. I am with ERG, the contractor supporting EPA. Before we get started, like Sharyn said, I'd like to review some housekeeping items with all of you. When you logged on you should've seen a statement that said this hearing is being recorded. Closed captions are available for today's presentation. To turn those on or to adjust the settings of the captions, navigate to the closed caption icon on the bottom of your control panel to the right of center. You're going to be asked in a moment to please select your preferred language by clicking on the interpretation icon on the bottom of your screen. If you select the Spanish channel, please click the globe icon, and select mute original audio. English speakers, you must also select a language, so please select English. Attendees have been muted, and their videos have been turned off to preserve video and audio quality. Audio is available for this presentation through your computer's mic and speakers or by telephone. If today you experience any technical difficulties with your computer microphone, you can use your phone by clicking the upward arrow by the mute and unmute button in the Zoom control panel across the bottom of your screen. After you click the upward arrow to switch to phone audio, then follow the instructions provided. If you experience any technical difficulties, please email meetings@erg.com, or you can message the ERG support team by using the chat box by directly chatting with my colleague, Julia, who is listed as attendee support. And we will try troubleshooting with you.

Sharyn Lie 00:02:19	Thank you. Welcome everyone, I'm Sharyn Lie, the Director of the Climate Change Division in the Office of Atmospheric Protection, and I'm serving as EPA's Hearing Chair. The purpose of today's hearing is to receive comments from interested parties on EPA's proposed rule, Waste Emissions Charge for Petroleum and Natural Gas Systems. Thank you
	for taking the time to share your comments and participate in today's hearing. In August 2022, Congress passed and President Biden signed the Inflation Reduction Act into law, which amended the Clean Air Act section 136 to reduce methane emissions from oil and gas. Clean Air Act section 136(c) directs the Administrator of the EPA to impose and collect a Waste Emissions Charge on methane emissions that exceed statutorily specified waste emission thresholds from owners or operators of applicable facilities. The Waste Emissions Charge, or WEC is specified in Clean Air Act section 136 to begin for emissions occurring in 2024, at \$900 per metric ton of methane exceeding the threshold, increasing to \$1200 per metric ton of methane in 2025 and \$1500 per metric ton of methane in 2026 and years after. The WEC only applies to the subset of a facility's emissions that are above the waste emissions threshold. Consistent with the Methane Emission Reduction Program under the Inflation Reduction Act, EPA announced a proposed rule on January 12, 2024, that would implement calculation procedures, flexibilities, and exemptions related to the Waste Emissions Charge and support the overall goal of reducing emissions of the greenhouse gas methane, one of the primary drivers of the climate crisis from applicable petroleum and natural gas facilities.
Sharyn Lie 00:04:14	Now, turning to this hearing, please note by registering for this event you are agreeing to abide by the ground rules of the virtual event. That includes rules of behavior. EPA is committed to an environment of mutual respect and safety. The Agency will not tolerate harassment, discrimination, intimidation, inappropriate language and images, or sustained disruption of the public hearing. EPA expects all participants including panelists, registered speakers, and attendees to conduct themselves in a respectful, professional, and civil manner. We will monitor and moderate this virtual event to ensure that common standards of decency are upheld. We are conducting this hearing under section 307(d) of the Clean Air Act to provide interested parties an opportunity for oral presentation in addition to

written submissions on the proposed rulemaking. A written transcript of this hearing will be available electronically on EPA's website and at the regulations.gov website under the docket for this rulemaking, which is docket number EPA-HQ-OAR-2023-0434. The official record of this hearing will be kept open for more than 30 days after the date of the hearing to provide an opportunity to submit rebuttal and supplemental

	testimony. You may submit this additional testimony to the same docket of this action by using one of the methods described in the <i>Federal Register</i> notice announcing the proposal. We ask that each person limit their verbal testimony to four minutes, given the number of testifiers for today. We will need to hold speakers to that time limit. Our contractor, ERG, will be facilitating the lineup of speakers and helping to keep testimony to four minutes. We'd appreciate all your cooperation allowing us to give everyone an opportunity to speak today. When you are finished with your comments, members of this panel may ask clarifying questions. This hearing is not intended to be a discussion of the proposed rulemaking. Though we might ask questions or request additional data of supporting materials, we will not respond to questions in this forum. Instead, we will provide a written response to comments as part of the process of finalizing this proposed rulemaking. Remember, you can continue to submit comments on this proposed rule through March 11, 2024. EPA considers all comments, whether submitted to the docket or given orally, equally. Please refer to the docket number on the screen when you submit your comments. The details on where to submit written comments can be found in the <i>Federal Register</i> notice announcing the proposal, as well as on our website. We encourage you to also submit a written copy of the testimony you provide today. We will also produce a written transcript of today's hearing. We will add the transcript to the public docket for this rulemaking. I would like to ask our other EPA panelists to introduce themselves at this time.
Erin McDuffie 00:07:22	Good morning, everyone. I am Erin McDuffie, and I am a physical scientist in EPA's Office of Atmospheric Protection.
Sarah Busch	Hi everyone, good morning. My name is Sarah Busch, and I
00:07:32	am a general engineer in EPA's Office of Atmospheric Protection.
Sharyn Lie	Thank you. This hearing will consist of five sessions. After
00:07:44	this first session, we will have a short break. After the break,
	the Hearing Chair and panelists for Session 2 will introduce
	themselves. Now we will transition to an overview of the
	public comment process. I will turn it back over to Kellie with
	ERG, who is helping to support today's session.

Kellie DuBay 00:08:04

Thanks, Sharyn. Alright, first we are going to review speaker order. Pre-registered speakers have been assigned a group number and a general timeslot. This information was provided via email and is available on EPA's Methane Emissions Reduction Program website. These groupings are also going to appear on the screen throughout the day, so everyone will know the speaker order. If a registered speaker is not available at the time they are called on, the Hearing Chair and myself will move to the next person on the list. If a registered speaker who is not present when called to speak does join the hearing later, we will fit them in as time allows as soon as possible. We may have time to take additional speakers in addition to those who have already registered to speak. If anyone participating as an observer today would like to speak, you can email meetings@erg.com, or you can send a message to attendee support in the chat, that's one of my colleagues, and as time allows, we will add you to the list and call your name after we go through the list of registered speakers. Please note that we will announce periodic fiveminute breaks throughout the hearing.

Now we are going to quickly review the process for speaking. For those of you that registered to speak today, the Hearing Chair or myself will call your name when it's time for you to share your comments based on the list of registered speakers you received. When you hear your name, my colleague is going to promote you to a panelist on Zoom. You will need to accept the panelist invitation when it pops up on your screen.

At that time, you will have the ability to unmute yourself using the unmute button on the left of your menu bar, and you can turn on your camera if you like, that is optional. If you are joining via phone, and you hear your name called to speak, the way that we all know you are here is by pressing * nine, and that will raise your digital hand, and you can press * six to unmute and speak. As Sharyn said, everyone will have four minutes to give your comments. You will see a clock on the screen, and I will also have a backup I will be using in case we have any glitches. If you are testifying by phone, the timekeeper will alert you when you have one minute remaining. To be fair to everyone, we are going to strictly enforce the four-minute limit so I apologize in advance for being that person. Please remember to speak slowly and clearly for our interpreters and our closed captioner. I may need to interject if I am asked to, to remind you to slow down if I receive a message from our interpreters or closed captioner. When you begin your comments we are asking you to start by providing your name, and you can also provide your affiliation if you choose. And as the Hearing Chair previously mentioned, I will let you know when your four minutes is up, and we will ask you to end your comments. So with that, I will turn it back over to Sharyn as

	our Hearing Chair to begin our process of our speakers.
Sharyn Lie 00:11:21	Thank you, Kellie. Jessica Moerman, you're the first speaker of the day.
Jessica Moerman 00:11:44	Good morning, thank you so much for this opportunity to provide public comment on the Waste Emissions Charge for petroleum and natural gas systems. I am the Reverend Dr. Jessica Moerman, President and CEO of the Evangelical Environmental Network. I'm a climate scientist by training and a pastor of a local church, but most importantly, I am the mother of two young boys who are the joy and light of my life. And I speak to you today from my capacity and experience in all three of these roles. First, I want to thank you on behalf of my children for taking methane emissions seriously. The health and future of every child depends on the decisions made today during this critical decade for climate change. Cutting methane pollution from oil and gas production with a strong Waste Emissions Charge is an incredible opportunity to defend our children's health while quickly reducing global warming. Medical research shows that children are among the most at risk for developing life-threatening conditions from exposure to fossil fuel pollution and that fossil fuel combustion is a leading environmental threat to children's health. A multitude of studies link living in proximity to natural gas development and methane production to birth defects to the spine, brain, and spinal cord, as well as to lower birth weights. As an evangelical pastor, I take seriously what the Bible says in Proverbs 13:22, that it is our duty to leave a good inheritance to future generations. Birth defects, breathing problems, and severe health complications are no inheritance to leave to our children. Methane pollution isn't a small or isolated problem either. Over 17 million Americans, and that includes 3.2 million children, live, work, or go to school within the half mile health threat radius of an oil and gas facility. Methane is also a powerful greenhouse gas, 86 times more potent than CO ₂ in the first 20 years, and is responsible for at least one quarter of the climate warming we are experiencing today. Warmer temperatures also produce more smog,

	scientist however, I know there's a silver lining that we can take advantage of. Methane's significantly stronger warming punch and shorter lifespan in the atmosphere means that reducing methane emissions is the fastest way to slow global warming while defending the health of all of God's children. That makes finalizing a strong Methane Emissions Charge, as quickly as possible, more important than ever. To ensure that EPA's implementation of that fee fulfills Congress's goals, the final waste charge must include key requirements such as regulatory compliance exemptions only become available after final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for exemption must also demonstrate full compliance across their facilities. Strong and clear criteria must remain in place for operators seeking an exemption based on unreasonable permitting delays. When operators seek an exemption for plugged wells, they must clearly demonstrate that their wells have been properly plugged and are no longer polluting. We need transparent calculations and methodologies to accurately determine an owner or operator's net emissions, and we need strong verification protocols so that fee obligations accurately reflect reported emissions in that exemptions are only available once the conditions Congress set forth are met. I urge you to finalize a robust waste charge as quickly as possible. The health and future of my children and every child depends on it. Thank you so much.
Sharyn Lie 00:15:43	Thank you for your comments. We will now move on to the next speaker, unless any of the EPA panelist have any questions. If not, we will go to our next speaker.
Kellie DuBay 00:16:01	Sharyn, Gusty Sauer may be participating by phone, so I'm going to give a reminder that Gusty, if you are participating by phone, as we don't see your name in the list of participants, please hit * nine to raise your digital hand to let us know that you are here.
Sharyn Lie 00:16:30	Last call for Gusty Sauer. If not, we will move on to Dean Van Farowe. Apologies in advance for the pronunciation.
Kellie DuBay 00:16:43	I believe it's the same situation with Dean. Dean, if you are here via phone. I do see a hand going up in the participants list. Julia, if you could, I believe they can hit * six and be able to participate. This could be Gusty, or it could be Dean.
Dean Van Farowe 00:17:11	Good morning, my name is Dean Van Farowe, and thank you very much for allowing me the opportunity to testify today. I testify as a Clevelander and as the Ohio outreach coordinator with the Evangelical Environmental Network. I want to thank you for giving us this rule to cut methane and other harmful pollutants from new and existing oil and gas operations. As a Christian, my Lord teaches me to love my neighbor as myself, and that includes keeping the air that God wisely

made and maintains clean for everyone to breathe equally. So therefore, reducing methane waste emissions is an act of love. So my city of residence is Cleveland, and we currently have the sad distinction of being the Asthma and Allergy Foundation of America's number one asthma capital in the Midwest and number four in the entire country. In fact, we are the only U.S. city that has a top three worse than average in all three of the AAFA risk categories. So I testify as one whose wife has asthma, my son does as well, and my neighbors suffer from it as well. One reason is methane pollution. As you know methane is a volatile organic compound that contributes to ground-level ozone, a prime element of smog and toxic to humans and even to plants. As a greenhouse gas, methane is also trapping that ozone on our level, which is a really bad situation for asthma sufferers. and research shows that exposure to methane is associated with a 25 percent increase in children's asthma. So I testify with a desire to help improve air quality by reducing methane waste emissions. Although there are orphaned and abandoned methane wells that also need our concern. I support the Waste Emissions Charge because we have to start with this low hanging fruit, like the larger well operations that would be responsible to pay this charge. They are emitting so many tons of methane, and I appreciate the EPA's great job so far setting this up. The MERP (Methane Emissions Reduction Program) includes over \$1 billion in funding to help states and other communities cut emissions. The fee itself seems reasonable as well, \$900 per ton of methane and a small increase each year after that, and it exempts companies if they use industry safeguards to reduce their methane. I am grateful for the thoughtful work of how this charge has been developed, and I'm grateful for how it will improve air quality. So I advocate four things as I close, that regulatory compliance exemptions only become available after final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Number two, strong and clear criteria must remain in place for operators who seek an exemption based on unreasonable permitting delays. Transparent calculations and methodologies number three, to accurately determine an owner or operator's net emissions. And finally, strong verification protocols so that fee obligations accurately reflect reported emissions. In conclusion, I'm so grateful to the EPA for addressing the urgent health need with the Waste Emissions Charge, and again as a Christian, I certainly advocate for this pathway for enhanced community monitoring. Strengthen emission standards for storage tanks in the proposal for limited flaring. Thank you so much for all your work on this important public health matter.

Sharyn Lie

Thank you very much for your comments. We need to move

00:21:12	on to the next speaker unless any EPA panelist have
00.21.12	clarifying questions. If not, we will move on to Paul Espenan.
Paul Espenan	Good morning. Thank you for the opportunity to comment. In
00:21:28	the process for making up this rule, the Congressional intent
00.21.20	was that this be an empirical process. Based on the schedule
	that EPA has put forth with the subpart W revisions not being
	complete, we have concerns that the process will not be
	empirical. This is because EPA has stated that the factors
	that they are proposing to revise are in fact not accurate so
	that with the changes made to subpart W, the rule would
	become more empirical. Yet the 2024 reporting year is what
	is being used for the first part of this process, so we
	encourage EPA to reconcile this to become more empirical
	as Congress directed. Secondly, the natural gas
	sustainability initiative which is supported by the non-
	governmental organization for social responsible investing,
	CERES, has worked together to develop what is known as
	the NGSI method of methane intensity. This method is one
	that is equitable to all oil and gas operators. It makes
	adjustments for the heating value of natural gas, the
	presence of liquids within the natural gas production, and
	also the production of oil. The proposal that EPA has made
	does not act as an equitable solution for the Waste
	Emissions Charge. We encourage EPA to take a hard look at
	the Natural Gas Sustainability Initiative's work because we
	believe Congress actually based the Waste Emissions
	Charge thresholds on that body of work, and it was their
	intent that it be based on the Natural Gas Sustainability
	Initiative's work. So we encourage EPA to take a look at
	those two issues. That is all of our comments that we have
	right now. We would also note that we submitted written
	comments to the RFI that contain these comments and that
	we also will submit written comments for this rulemaking.
	Thank you very much.
Sharyn Lie	Thank you for your comments.
00:23:59	Unless I see a hand from one of the panelists to ask clarifying
	questions, I will move on to Phyllis Blumberg.
Phyllis Blumberg	Hello, I am Phyllis Blumberg, and thank you very much for
00:24:16	allowing the public to speak. I live in Wynnewood,
	Pennsylvania. I speak on behalf of my three sons and my two
	grandsons as well as all children and all future generations.
	Pennsylvania, especially in Appalachia, is disproportionately
	impacted by methane pollution. I urge the EPA to quickly
	finalize and implement the Methane Emissions Reduction
	Program Waste Emissions Charge, which is mandated by
	Congress in the Inflation Reduction Act. Methane is a
	greenhouse gas that contributes 25 percent of our current
	climate change and is 86 percent times more potent than
	carbon dioxide. Even more important, methane causes many
	health problems, especially asthma and other respiratory
	problems in children, and cancers for people of all ages and
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	many premature deaths. Over 10.1 million people in the United States, including 645,400 children under the age of five, reside within 1/2 mile of active gas and oil production operations. These fenceline communities face health system threats every single day because they are forced to breathe air that's polluted with methane and the toxic chemicals that are emitted alongside it. Oil and gas production is responsible for 77 billion in annual U.S. health damages, including thousands of early deaths and childhood asthma cases nationwide. Reducing methane pollution from the fossil fuel industry is the fastest and most effective way to slow the rate of climate crisis and preventing risk for the life of many people. And methane can be reduced from the atmosphere much quicker than carbon dioxide. Therefore, it is most urgent that we hold the nation's largest oil and gas polluters responsible and accountable for their excess pollution, carbon pollution. These industries are the largest industrial source of methane. This is a commonsense thing. Large polluting companies pay, yet all large oil and gas companies can avoid paying if they comply with federal methane standards. When operators reduce leaks to avoid paying the fee, they will waste less energy, create more good paying jobs, prevent the worsening of the strange and severe weather such as wildfires and floods, and help to make millions of people lead more healthy lives. I would've liked the fee to be extended to companies with lower emission profiles, since methane is so toxic and causes so much global warming especially because Pennsylvania has so many smaller operators. But this is a good start, and I recognize that we need to get started. Taking action is a moral imperative. As a Jew, my tradition has taught me that individuals can damage the Commons and must be held responsible. Thank you again.
Sharyn Lie 00:27:43	Thank you for your comments. We will now move on to the next speaker if we don't have any clarifying questions from the panel. All right, Matthew Lee.
Kellie DuBay 00:27:54	He may be on the phone with us. Matthew, if you are participating via phone, could you please hit * nine to raise your hand. I do see a hand up, Julia.
Matthew Lee 00:28:09	Hello.
Kellie DuBay	Is that you Matthew?
00:28:11 Matthew Lee	Yes.
00:28:13	Okana are at
Kellie DuBay 00:28:14	Okay great.
Matthew Lee 00:28:15	Thank you. Well thank you EPA, and good morning. My name is Matthew Lee, and I serve as the federal policy specialist at the Evangelical Environmental Network. As an

Kellie DuBay Neil, are you able to unmute?	Sharyn Lie 00:31:22	evangelical Christian, we believe in defending life and loving my neighbor as myself. I strongly support the EPA's proposed Waste Emissions Charge. This rule is important to me personally as someone who suffered from asthma in childhood. When I was young, I lived near a lot of pollution from traffic and industry. I don't have a lot of memories from my childhood, but I do remember visiting the doctor's office a lot of times. I also remember drinking a lot of cough syrup, and I even had a favorite flavor, which was strawberry. My parents eventually decided to move our family to a suburb with less pollution, which instantly improved my condition. We will never know the true cause of my asthma, but what we do know is that many pollutants that are commonly emitted alongside methane and oil and gas facilities have been linked to asthma and a lot of other health conditions. That's why we need strong standards to hold polluters accountable and make sure they're not offloading their pollution onto more generations of kids like me. My family will never be compensated for all the hospital visits, but we can prevent future generations from having to suffer the same thing. To ensure this, I believe that the EPA should ensure that its final rule includes the following aspects which other commentators have noted. First, that the regulatory compliance exemptions only become available after the final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for an exemption must also demonstrate full compliance across their facilities. Second, strong and clear criteria must remain in place for operators seeking an exemption based on unreasonable permitting delays. Third, when operator's seek an exemption for plugged wells, they must clearly demonstrate that their wells have been properly plugged and are no longer polluting. Fourth, transparent calculations and methodologies must accurately determine an owner and operator's net emission
	Kellie DuBay	
	00:31:38	•

Neil Waggoner 00:31:40

Yes, I am. Thank you, sorry, it took me a second to sign back in. Alright, good morning. My name is Neil Waggoner, and I reside in Columbus, Ohio and I am the Deputy Director for federal energy campaigns at the Sierra Club. I'm pleased to offer my comments today in support of EPA's overall efforts to reduce methane emissions and today specifically, the creation of a Waste Emissions Charge for the oil and gas industry. As you are aware, methane is a short-lived climate pollutant that has more than 80 times the warming potential of carbon dioxide over a 20-year period. Methane is also the second biggest contributor to global warming following carbon dioxide, is responsible for more than 25 percent of the climate change we are already experiencing today. As we confront the dual public health and environmental threat that is the climate crisis, reducing method pollution is the fastest, most cost-effective way to immediately slow our current rate of global warming. And oil and gas companies are the largest industrial source of methane. I want to highlight that EPA and the Biden administration are already taking important steps here. The recent finalization of the new methane rule in December 2023 should be applauded. The safeguards in that rule, which include first ever standards for existing equipment while also strengthening standards for new equipment, are a major win for our climate and public health. The Methane Emissions Reduction Program, a core component of the historic Inflation Reduction Act, provides a number of important elements to the fight to curb methane pollution, not least of which is the creation of the new methane emissions charge. Notably I was thrilled on this front to hear the conditional announcement that Ohio would receive millions in funds from this program to reduce methane emissions. This commitment and support from EPA and the Biden administration is incredibly important here in Ohio, where the state government continues to not take climate change seriously but instead focus on things like electricity customer funded bailouts of 1950s coal plants through corrupt legislation and opening up Ohio's vulnerable state parks to fracking despite widespread public opposition. Now in terms of the Waste Emissions Charge, as EPA works towards finalization, it is my hope you will do so expeditiously while also ensuring there are no loopholes that would allow big polluters to avoid the charge and avoid accountability. It is also my hope that revenue from this charge will be used to mitigate the health effects of methane and associated pollution in low-income and disadvantaged communities. Increased monitoring of methane pollution and deployment of technology to better track the sources and spread of methane pollution. Thank you for the opportunity to speak on the matter, and thank you to all the EPA staff working on this proposal. I yield the remainder of my time.

Sharyn Lie 00:34:40	Thank you for your comments, and everybody has been very efficient. I believe the only person from this panel who wasn't available earlier was Gusty Sauer. Gusty, if you are here and would like to speak, we still have time. If you're on the phone, please raise your digital hand by hitting * nine. If not, Kellie, do we have anyone else who is available to speak?
Kellie DuBay 00:35:10	We have not had any requests yet, Sharyn. If you haven't registered to speak and you are interested in speaking and are currently participating as an observer, you can email meetings@erg.com, and we do have time and Sharyn pointed out to have an opportunity to make a public comment if you would like.
Sharyn Lie 00:35:41	That will be a good reminder.
Kellie DuBay 00:35:43	I was going to say, also if you wanted to speak, that's my backup timer. You can also message attendee support in the chat, so you can either email meetings@erg.com or send a message to attendee support in the chat. And that will let us know you are interested in making a public comment, even though you were not originally registered. We do have somebody I think who was preregistered who would like to make their public statement now or their public comment now. So, I believe we have Elizabeth, I don't have a last name.
Sharyn Lie 00:36:28	Scrafford. Elizabeth Scrafford.
Kellie DuBay 00:36:29	There we go, Elizabeth Scrafford. Elizabeth, if you're ready to speak, we can certainly take your public comment now.
Elizabeth Scrafford 00:36:45	Good morning, can you hear me?
Kellie DuBay 00:36:48	We can.
Elizabeth Scrafford 00:36:49	Sweet, it took a minute to get it all set up. Thank you for this opportunity to testify on this rulemaking process. I was planning to speak later, but I have a busy workday so this works. My name is Elizabeth Scrafford. I'm a deputy regional field director at the Sierra Club. I work with folks in North Dakota, South Dakota, Minnesota, and Michigan, but in my time at Sierra Club I have spent a lot of time working with folks in quite a few states. And while I currently live in Chicago, I grew up in the mountains of north Idaho. And it is my personal experience that first drove me into environmental activism and that piques my interest in this hearing today. As a toddler my family lived in my dad's hometown of Smelterville, Idaho until the operations were closed by the EPA in the late 80's because of the high amount of pollution there. I just turned 40 years old, and Smelterville continues to be a part of the EPA's cleanup of the Coeur d'Alene River Basin. In fact, the Coeur d'Alene Basin cleanup is one of the largest and most complex

Superfund sites. The creek that I grew up playing in at the end of our street, Beech Street, is now gated off. And I'm very passionate that kids deserve better. And I'm here to speak to you as someone who has been impacted directly by pollution. My family worked in mines and Smelterville for generations. My dad, my great uncles, my grandpa, my great-grandfather, and what I have learned coming from a community like this that is we have a moral obligation to put the concerns of communities and future generations over the short-term financial interests of corporations. The EPA has a very special role to play here in ensuring that kids living in towns with industry experience the least amount of harm possible. And this rulemaking process is a step in the right direction. Right now over 10.1 million people in the US, including over 600,000 kids under the age of five, live within half a mile of an active oil and gas operation. And not surprising, one study done by the Environmental Defense Fund in 2019 found that those living within 500 feet of this are at an active -- excuse me, are at an increased risk of cancer. And those who are living within 200 -- I'm sorry, stumbling over my words because I'm a little passionate about this and speaking to you earlier than anticipated this morning. Those living within 2,000 feet are at risk of adverse health impacts. I myself have asthma, and what I know coming from the silver valley is no one who lives next to industry gets out of these communities unimpacted. And, you know, everyone on the street I grew up on has died early or walked away from that community with a lot of health issues. So this is something that is super personal to me is how we think about protecting future generations. And unfortunately, we know that fossil fuel companies don't often do the right thing until they are forced to. The Methane Emissions Reduction Program's Waste Emissions Charge, which was mandated by Congress in the Inflation Reduction Act. is a commonsense fee that will hold the Nation's largest oil and gas polluters accountable for excessive climate pollution. This Waste Emissions Charge will help ensure oil and gas operators comply with federal methane standards by assessing a fee on the largest polluters. As I was reading and prepping to talk to you, I was seeing all of the job creation that would also be made with reducing methane. My dad is a welder, and my family worked in the silver mines. Also thinking about just because we are enforcing pollution reduction doesn't mean that all the jobs go away. There are other options, so I also want to remind folks of that. Thanks for this opportunity to speak and to go early. Sharyn Lie Thank you for your comments. We have a clarifying question from Sarah Busch. 00:40:51 Thank you, Elizabeth. We appreciate you sharing your Sarah Busch 00:40:57 perspective. You mentioned an EDF report from 2019, so more of a statement than a question. I would really

	encourage you to submit that report to our dockets, so we can review them. Thank you.
Elizabeth Scrafford 00:41:10	Thanks so much, I will do that.
Sharyn Lie 00:41:15	Great, that concludes panel one. We are running just a few minutes early. We are getting ready to transition to panel two. Our first speaker is Giovanna Rossi. Giovanni[a], are you available? If you're on the phone, please press * nine to raise your hand. Giovanna, sorry. Giovanna is not here.
Giovanna Rossi 00:41:54	I am here.
Sharyn Lie 00:41:57	Alright, thanks, Giovanna.
Giovanna Rossi 00:41:59	Hi, good morning. Thank you so much for the opportunity to provide public comment. My name is Giovanna Rossi. And I am a field organizer for Moms Clean Air Force in New Mexico. Warmer temperatures caused by climate change make air pollution worse, putting the health of New Mexico's children at risk. Quickly and significantly reducing methane pollution is one of the best levers we have to slow the rate of climate change and help clean up air to protect children's health. New Mexico moms support the Methane Emissions Reduction Program and the need to cut methane and other harmful pollutants from oil and gas operations across the country. By ensuring oil and gas operations across the country. By ensuring oil and gas operations with federal methane standards and take action now to reduce emissions, this program is an important step toward addressing the climate crisis and protecting the health and safety of children and families across the country. Climate change is already impacting our families and communities in New Mexico. We are seeing firsthand the effects of climate instability on our most vulnerable populations, children, older adults, pregnant women, and those whose health is compromised, communities of color, and low-income communities. I saw this up close and personal in the summer of 2021, when a good friend who lives on her family farm in Las Vegas, New Mexico began collecting and delivering supplies to surrounding families. Seeing her neighbors had been evacuated because of the Hermits Peak wildfires but unable to move all their animals, their cows and horses remained dangerously close to the burning forest. We organized quickly and started collecting food and other supplies they needed. I will never forget the look of desperation in her eyes with her young son in the backseat of her car as we piled canned food, diapers, and boxes of cereal into the backseat of her car. We were in a hurry because she still needed to drive the 90 miles back to her community to deliver the supplies and then go check on

	uncommon story. Methane pollution from the oil and gas industry is fueling the climate crisis and endangering the health and safety of communities across the country. Millions of people across the U.S. and around the world are experiencing strange and severe weather and severe health impacts as temperatures continue to rise. Cutting methane pollution will help reduce the impacts of climate change and can also improve air quality and public health. Scientists have known for decades that air pollution is harmful to health, and this is especially true for vulnerable populations such as older adults, people with underlying conditions, communities of color, pregnant women, and children. According to our own New Mexico Department of Health, asthma is one of the most common chronic diseases in our state with over 136,000 adults and 26,000 children currently having the disease. We know that people with asthma are more likely to miss school or work, so cutting methane would reduce the air pollution that can lead to an asthma attack and curb the other health impacts of climate change. This is a win for public health. Slowing today's unprecedented rate of warming can help avert our most acute climate risks, making it critical that the Biden administration implements solutions to cut methane pollution. Today I'm urging EPA to swiftly enforce this commonsense fee that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution. Protecting public health means keeping everybody's air clean and safe to breathe, and cutting methane pollution from the oil and gas industry is essential to this effort. Thank you so
Sharyn Lie 00:46:10	much. Thank you for your comments. We will now move on to our next speaker, Fred Scherlinder Dobb. Fred, if you are on the phone, please press * nine to raise your hand. All right, well we will move on to our next speaker, Kim Anderson. Kim, are you available?
Kim Anderson 00:46:47	Yes, I am, can you hear me?
Sharyn Lie 00:46:49	Yes, thank you.
Kim Anderson 00:46:51	Thank you for this opportunity to comment on the Waste Emissions Charge for petroleum and natural gas systems. I am a wife, mother, and person of faith and work for the Evangelical Environmental Network. In Mark chapter 10 when children were brought to Jesus he said, let the children come to me, do not hinder them for to such belongs the kingdom of God. This rule does a great job of ensuring our children are not hindered. It is an important step for defending the health of our children and communities, addressing climate change, and creating new family-sustaining careers to detect, plug, and prevent wasteful methane emissions. I live in western Pennsylvania where

there's a lot of oil and gas infrastructure. It is hard for me to go almost anywhere without seeing a pipeline compressor station or other infrastructure gated off at the side of the road. Medical research shows that exposure to methane is associated with congenital heart defects, a 25 percent increase in children's asthma, 86 times exposure to known cancer-causing chemicals, and an increase in low birth weight, which can lead to a lifetime of health complications including increased brain, spine, and spinal cord defects. Many forms of pollution are also associated with dementia, which has had a huge impact on my family, as well as my father passed away from it this year. My father-in-law has passed away from it, as well as my grandmother, and both my mom and mother-in-law also suffer from dementia. As I look at this infrastructure. I often wonder about the impact this infrastructure and potential leaking toxins is having on my health or even worse, having on the health of my children. For most of their critical years when their hearts, minds, and lungs were growing, when their bodies are most susceptible, we have lived near oil and gas infrastructure. Was the health of my children and parents impacted because of exposure during their formative years? Are we hindering children from coming to the kingdom of God by exposing them to these toxics which impact their health?

Fortunately, there are actions we can take to avoid situations like this for other children by strengthening methane safeguards and thus defending the life of children like mine and parents like mine. This proposed rule goes a long way in making the air we breathe in and the water we drink in western Pennsylvania more pure and safe for children like mine. The rule imposes a methane fee on certain oil and gas facilities that emit more than 25,000 metric tons of carbon dioxide equivalent of greenhouse emissions. That is the equivalent of approximately 4,600 passenger vehicles for a whole year. One thing I like about this rule is it does not hinder the business of small businesses, as they are exempted from the rule. Also companies that abide by the limits will not have to pay the fee. To ensure the EPA's implementation of the fee fulfills Congress's goals, the final regulation must include, must continue to include, key requirements including one, that regulatory compliance exemptions only become available after final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for an exemption must also demonstrate full compliance across their facilities. Two, strong and clear criteria must remain in place for operators seeking an exemption based on unreasonable permitting delays. Three, when operators seek an exemption for plugged wells, they must clearly demonstrate that their wells have been properly plugged and are no longer polluting. Four, transparent

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	calculations and methodologies to accurately determine an owner or operator's net emissions and five, strong verification protocols so that fee applications accurately reflect reported emissions and exemptions are only available once the conditions Congress set forth are met. Pollution and emissions have hit way too close to home for me and my family these last few years. Please do what you can now to hold companies accountable in the future, so more parents like me don't ever wonder whether where their children live, learn, and play is safe for them. And people like me don't have to worry about whether we will end up with dementia. Thank you.
Sharyn Lie 00:50:53	Thank you for your comments. We will now move on to our next speaker, Hunter Noffsinger. Hunter, if you are on the phone, please press * nine to raise your digital hand so that we can promote you to a speaker. Hunter is not here. We will move on to our next speaker, Tracy Sabetta, but we know that she was having some technical issues. Tracy, were you able to join us?
Unknown Speaker 00:51:25	[inaudible]
Sharyn Lie 00:51:27	Yes?
Unknown speaker 00:51:28	I was. Just as I started, you called.
Sharyn Lie 00:51:35	Okay. Is this Tracy?
Unknown speaker 00:51:38	[inaudible] No problem.
Kellie DuBay 00:51:39	If Kim could mute herself?
Unknown speaker 00:51:41	[inaudible]
Sharyn Lie 00:51:57	The floor is yours.
Tracy Sabetta 00:51:59	Thanks so much, and thank you for your help in getting me to this point this morning with my technical difficulties. Good morning, and thank you for the opportunity to offer remarks today. My name is Tracy Sabetta, and I am the field organizer for Moms Clean Air Force in Pickerington, Ohio just outside of Columbus. I'm the mother of one daughter and a lifelong resident of the Buckeye state. I'm speaking today in support of the EPA's proposed Methane Emissions Reduction Program and the need to cut methane and other harmful pollutants from oil and gas operations across the country. By ensuring oil and gas operators comply with federal methane standards and take action now to reduce emissions, this program is an important step toward addressing the climate crisis and protecting the health and safety of children and families across the country. We know

that reducing methane pollution is the fastest, most costeffective way to immediately slow our current rate of climate change, and oil and gas companies are the largest industrial source of methane. The Methane Emissions Reduction Program's Waste Emissions Charge is a commonsense fee that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution. The Waste Emissions Charge mandated by Congress in the Inflation Reduction Act will help ensure oil and gas operators comply with federal methane standards by assessing the fee on the largest polluters if those companies failed to comply with federal standards. If the companies abide by commonsense methane standards that cut waste and pollution, they won't pay the fee. Adopting rules to limit methane pollution would have a profound impact on states like Ohio that have failed to enact meaningful oil and gas methane protections of their own. Our state continues to be a major natural gas and oil producing state. According to the U.S. Energy Information Administration natural gas production in Ohio in 2022 was about 27 times greater than in 2012. So what does that look like? We are currently home to more than 60,000 active oil and gas wells. About 3 million Ohioans, which is roughly 26 percent, live within a mile of these wells, and many of those most heavily impacted live just downwind, and in fact the state legislature recently renewed its commitment to leasing public lands and state parks to oil and gas drilling. So given these statistics it is no surprise we rank in the top five states with the highest health impacts from oil and gas pollution. A recent study led by Boston University's School of Public Health and Environmental Defense Fund found that air pollution from the oil and gas sector has substantial adverse impacts on air quality, human health, and healthcare costs. The study revealed that in 2016, oil and gas air pollution in Ohio caused 349 early deaths and exacerbated asthma in 15,500 children in the state. The American Lung Association reports that there are currently 152,000 children living with asthma in Ohio, meaning that methane pollution negatively touched more than one in 10 of our youngest residents. When I started working with Moms Clean Air Force in 2011, my daughter was only 12 years old. I jumped at the chance to make a difference for her future and her health. Now 13 years later I often wonder if any of us have done enough. But each step forward gives me hope, and the finalization of the EPA methane rule last year was a major accomplishment, but the work didn't stop there. Moms Clean Air Force in Ohio supports the EPA's proposed Methane Emissions Reduction Program to help enforce hard-won federal methane standards and protect the health and safety of my daughter and children and families across the country. Thank you again for this opportunity.

Sharyn Lie 00:55:25 Kellie DuBay 00:55:51 Sharyn Lie 00:55:55	Thank you for your comments. Any clarifying questions from the panel? No, if not we will move on to our next panelist, Antoinette Reyes. Are you here? And if you're on the phone you can hit * nine to unmute yourself or to raise your hand. Do we have Antoinette? I don't believe she is here, Sharyn. We will move on to Diana Van Vleet. I know we are running a little bit ahead of schedule, but hopefully there she is. Hi
Diana Van Vleet	Diana. Can you hear me okay?
00:56:11 Sharyn Lie	Yes.
00:56:14 Diana Van Vleet 00:56:15	Thank you so much for the opportunity to speak to you today. My name is Diana Van Vleet. I am the director of nationwide clean air advocacy at the American Lung Association. I want to express the Lung Association's support for the U.S. Environmental Protection Agency's proposed regulations to implement the Methane Emissions Reduction Program's (or MERP's) Waste Emissions Charge (or WEC) for petroleum and natural gas systems. We will share additional thoughts and written comments, but I want to share an overview today of the profound importance of this action for people's health. In the midst of many acronyms and technical figures, it is easy to forget the real-world significance of a proposed regulatory action like the one you're talking about today. The Methane Emissions Reduction Program's Waste Emissions Charge, which was mandated by Congress in the Inflation Reduction Act, is a commonsense fee that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution. Reducing methane pollution is one of the fastest, most cost-effective ways to immediately slow our current rate of climate change, and oil and gas companies are the largest industrial source of methane as you heard before. The climate crisis is upon us, and the health of everyone in this country is at risk. It is impossible to overstate the importance and urgency of this problem. According to NOAA, the U.S. experienced 28 separate weather and climate disasters costing at least \$1 billion in 2023. That number puts 2023 into first place with the highest number of billion-dollar disasters in a calendar year. Recordbreaking oppressive heat scorched much of the country, and deadly wildfires took a devastating toll. Climate change makes air quality worse, from wildfire smoke to more ground-level ozone pollution due to rising temperatures, to dangerous mold after flooding events. In my capacity as an advocate for the Lung Association, I am telling you that mitigating the worst impacts of climate change is an integral priori

	parent I am urging you to take as much meaningful action as possible on climate, including strong and effective implementation of the WEC to try and protect a livable world for future generations including my son. Additionally, there are a number of other dangerous pollutants released alongside methane from the oil and gas development. These include volatile organic compounds (or VOCs), which combined with nitrogen oxides to form harmful ground-level ozone pollution as well as toxic air pollutants such as benzene which is known to cause cancer. Ozone pollution can cause asthma attacks, strokes, heart attacks, and premature death. Communities living near oil and gas wells face greater exposure and risks from these pollutants and are more likely to be low-income communities and communities of color. We will elaborate more on this in our written comments, but I will say here that we are calling this rule to be finalized quickly and for the final rule to continue to include the following key requirements. Ensuring the regulatory compliance exemption is only available once final standards and plans are in effect in all states that are at least as strong as the EPA's 2021 proposal and requiring operators to demonstrate full compliance across the facilities laying out clear criteria for operators seeking to claim an exemption for an unreasonable delay in permitting. Requiring a demonstration from operators seeking an exemption for plugged wells that their wells have been properly plugged in accordance with all requirements and are no longer polluting. Establishing transparent calculations and methodologies for determining an owner or operator's net emissions. And including verification protocols to ensure exemptions are only available once the conditions in the law are met and that fee obligations reflect accurately reported emissions. Thank you so much for your important work on this.
Sharyn Lie 01:00:26	Thank you for your comments. At this time, we do still have a little bit of additional time. I would invite any of the speakers from this panel or commenters from this panel who were not able to make their allotted time slot, if you are available now
	to make your public comments, you have time. Please raise your digital hand by pressing * nine if you're one of the scheduled commenters. I know we had a request for a later slot for one speaker. Sorry, go ahead.
Kellie DuBay 01:01:03	I was going to say, Sharyn, if Fred Scherlinder Dobb is here or Hunter Noffsinger, those two I think are the two from the Speaker Group that weren't available when the names were called so if they are available via phone since we still don't see your name, feel free as Sharyn pointed out hit * nine to raise a digital hand.
Sharyn Lie 01:01:35	If no scheduled speakers are available, we do have time to take a few additional comments. I believe Marlene Perrotte is available to speak. Marlene Perrotte

Kellie DuBay	Marlene Perrotte should be unmuting shortly. For those of
01:02:14	you with hands up who would like to speak, if you could please put your name in the chat, and we will pick your name up from there if you're interested in speaking. I see a couple
	hands up. Thank you.
Sharyn Lie 01:02:38	Marlene, we see you on camera.
Marlene Perrotte 01:02:40	Can you hear me?
Sharyn Lie 01:02:43	Yes.
Marlene Perrotte 01:02:44	Good morning, all. This has been a long journey for getting federal rules to protect our health. Methane, as people have said, is extremely dangerous, and we must find ways in reducing methane reduction. Especially here in New Mexico, in the southeast area of the Permian Basin, we are now the second most producing of oil and gas in the world. And we have tried to have good protection for the citizens here in New Mexico. I certainly support and want to say that as a woman of faith, it is so important that we recognize the moral and ethical dimensions of protecting this planet from methane. So, I support the methane reduction program that EPA is now providing. And let us do all that we can for the Waste Emissions Charge for petroleum and natural gas systems proposed rule. Thank you very much.
Sharyn Lie 01:04:24	Thank you for your comments. I believe next we have a volunteer, Monica Hilding. I believe you are available to speak now. Monica?
Kellie DuBay 01:04:58	She may be getting her panelist invite.
Sharyn Lie 01:05:07	Thank you for the people who have put their names in that chat. It looks like we may have time.
Monica Hilding 01:05:12	This is Monica Hilding. Thank you very much for allowing me to speak earlier. I am living here in Salt Lake City, Utah, and we have a problem in the Uintah Basin of very high ozone levels. And I am very concerned about methane emissions. Reducing methane pollution is the fastest and most costeffective way to immediately slow our current rate of global warming, and oil and gas companies are the largest industrial source of methane. The Methane Emissions Reduction Program Waste Emissions Charge, which was mandated by Congress in the Inflation Reduction Act, is a commonsense fee that will hold nation's largest oil and gas polluters accountable for excessive climate pollution. The Waste Emissions Charge will help ensure oil and gas operators comply with federal methane standards by assessing a fee on the largest polluters. if those companies fail to comply with federal standards. If companies abide by commonsense methane standards that cut waste and pollution, they won't pay a fee.

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	The fee also incentivizes companies to take action now, which we need to reduce emissions. Leading companies have already pledged to limit emissions below the Waste Emissions Charge's pollution thresholds and would avoid being subjected to these fees. There are a variety of costeffective and successful technologies that would help operators avoid the fee. Operators are also implementing many of these technologies such as advanced monitoring techniques and zero-emitting process controllers. Methane Emissions Reduction Program also includes over \$1 billion in funding to reduce methane emissions for states, Tribal agencies, communities, and operators. So far, EPA and Department of Energy have already announced the commitment of \$350 million in funding for 14 states to help mitigate methane emissions at the end-of-life wells which we have a lot of in the Uintah Basin. The latest Intergovernment[al] Panel on Climate Change warns that the world must do more to reduce emissions now and through this decade to keep global warming to 1.5°C, and I can't see how much time I have left, but I think that this is the number of jobs the EPA methane rule would create and could sustain a significantly higher than the very nominal cost for upgrades in technology, equipment, and practices for the industry. So I'm hoping that you will pass this, the methane mitigation service sector in the U.S. has already doubled in size. 75 percent of manufacturing and in 88 percent of service firms report they would create more jobs if national methane standards were reinstated.
Kellie DuBay	You have 30 seconds, just to let you know.
01:08:48	T
Monica Hilding 01:08:51	Thank you. So methane is the biggest contributor to global warming, following carbon dioxide is responsible for more than 25 percent of climate change we are already experiencing. Thank you so much for allowing me to speak early. I will yield the rest of my time, and please follow through. This is an emergency. We have a climate emergency, and a lot of people are suffering. Thank you.
Sharyn Lie 01:09:23	Thank you for your comments. Our next speaker who volunteered to go early is, I am going to say this wrong I am sorry, Celerah Hewes. Celerah, we will give you a second to promote you to a panelist.
Celerah Hewes 01:09:49	Hello, thank you. Thank you so much for the opportunity to provide comment today. My name is Celerah Hewes, and I am a national field manager for Moms Clean Air Force living in Albuquerque, New Mexico. I grew up here in Albuquerque, but today I'm deeply concerned that the home my daughter will grow up in will be very different due to the public health and climate impacts we are experiencing. Climate impacts are made worse by methane, a powerful greenhouse gas pollutant that is fueling the climate crisis and is responsible

for 25 percent of the man-made global warming. Where we find climate-harming methane pollution, we also find other toxic air pollutants like benzene, which can worsen asthma, affect lung development in children, and increase the risk of cancer as well as neurological and reproductive problems. Protecting our climate and health means keeping everyone's air safe and clean to breathe, and cutting methane pollution from the oil and gas industry is essential to this effort. That is why I am here today to support the Methane Emissions Reduction Program. Reducing methane pollution from the oil and gas industry is the fastest, most cost-effective way to slow the rate of climate change happening now and avoid further escalation of strange and severe weather events such as wildfires and floods. By ensuring oil and gas operators comply with federal methane standards and take action now to reduce emissions, this program is an important step towards addressing the climate crisis and protecting the health and safety of children and families across the country. For over a decade, Moms Clean Air Force has been fighting for methane protections, and last year we were thrilled to celebrate the hard-fought finalization of the EPA methane rules but we know there is still work to be done and the Methane Emissions Reduction Program's Waste Emissions Charge is an important key to the success of EPA methane protections, as it is intended to work hand in glove with both federal methane rules and updates to the oil and gas Greenhouse Gas Reporting Program. Mandated by Congress in the Inflation Reduction Act, this commonsense fee will help ensure oil and gas operators comply with federal methane standards, hold the nation's largest oil and gas polluters accountable for excessive climate pollution, and incentivize companies to take action now to reduce methane emissions. Living in New Mexico, which has a strong state-level methane protections, we have seen operators able and willing to implement cost-effective and successful technologies that can help operators avoid the fee such as advanced monitoring techniques and zero-emitting process controllers. The Methane Emissions Reduction Program also includes over \$1 billion in funding to reduce methane emissions for states, Tribal agencies, communities, and operators because we need all large polluters to be held accountable. The reality is that we are impacted by methane pollution that does not respect state boundaries. It is in the air and the wind and it spreads. Cutting methane emissions is popular with communities, it benefits the health of families living near oil and gas, and is the quickest lever we have to slow the impacts of climate change. We know that without federal action, methane pollution from the oil and gas industry will continue to increase. The Biden EPA has set us on a path towards this with a strong and comprehensive methane rule, but we need mechanisms like the Methane

	Emissions Reduction Program to move swiftly to reduce emissions and protect the health of families. Climate can't wait and our children deserve swift action to limit methane emissions. Thank you so much for your time.
Sharyn Lie 01:13:07	Thank you for your comments. Next up we have Glen Besa. Glen, are you still available? Glen, if you are available, please let us know. Otherwise we are getting close to our time to move to panel three.
Glen Besa 01:13:43	Okay, can you hear me now?
Sharyn Lie 01:13:45	Yes.
Glen Besa 01:13:46	Okay, thank you very much. My name is Glen Besa. I'm speaking as a private citizen. I live in Chesterfield County outside of Richmond, Virginia. I'm speaking in support of this proposed rule to impose a Waste Emissions Charge for petroleum and natural gas systems. I'm extremely concerned with the impacts of climate change on our health and our general well-being. I personally suffer from asthma and take daily medication at considerable expense. Many lower-income individuals, including children who suffer with asthma and other respiratory illnesses, may not be able to afford this medication expense. That is why it is so important we reduce pollutants like methane. Additionally, climate impacts of methane contributed to the numerous wildfires that polluted our air this past summer along the East Coast and exacerbated people's respiratory problems. Those wildfires from Canada, for example. It was unbelievable to walk outside and see our sky filled with smoke from Canada. In January of this year, National Oceanic and Aeronautic [Atmospheric] Administration reported that 2023 was the warmest year on record. We also set a record for billion-plus disasters, 28 total in the U.S. alone. But it's not just dollars, it's lives lost. NOAA also reported that climate-related severe weather contributed to at least 492 direct or indirect fatalities, the eighth-most since 1980. This EPA rule is reasonable. It's important we follow the principle of polluters pay. Thank you for your time today. I appreciate it very much.
Sharyn Lie 01:15:22 Patrice Tomcik	Thank you for your comments, and with that I believe we will transition to our next set of speakers. We have Speaker Group 3. All right, and our first speaker from this group is Patrice Tomcik. Patrice, if you are available. There you go.
01:15:56	I'm here. Can you all hear me?
Sharyn Lie 01:16:01	Yes.
Patrice Tomcik 01:16:05	My name is Patrice Tomcik, and I'm the national field director for Moms Clean Air Force, a community of over 1.5 million parents united to protect our children's health from air pollution and climate change. I'm the mother of two boys

living in the town of Gibsonia located in southwestern Pennsylvania, and I support the Methane Emissions Reduction Program and the need to cut methane and other harmful pollutants from oil and gas operations. This program will help to address the climate crisis and protect the health of children across the country. While we're all vulnerable to air pollution and climate change, certain populations are certainly impacted more such as children in frontline communities. And those who are located the closest to oil and gas operations are impacted the most. In the U.S., more than 3 million children go to school within a half-mile of oil and gas operations that puts their health at risk. Active fracking of 11 gas wells just finished in my son's Mars area school district. The closest fracked wells are located about a half mile away from the school campus that puts 3,200 students' health at risk. Oil and gas operations emit climatewarming methane and harmful pollutants, such as benzene, that increase the risk of immune system damage and cancers. Every day I send my son to school, I fear for his health. Especially since he's a pediatric cancer survivor and is at a greater risk of having cancer again. And I'm really concerned about what my son would be breathing into his developing lungs. There's a growing body of scientific studies indicating an increased risk of health impacts associated with being located in close proximity to oil and gas operations. In this study, researchers from Yale found that Pennsylvania children living near unconventional oil and gas wells are about three times more likely to be diagnosed with leukemia than those who did not live near wells. My son, who was diagnosed with leukemia at age three, may have been among those children included in the study. The two homes he's lived in all his life are on top of the Marcellus shelf, are surrounded by the very same gas wells that were analyzed by the study. In addition, researchers from the University of Pittsburgh published a report that found associations between the gas industry activity in Pennsylvania and increased risks of asthma and also lymphoma in children. Every time new research comes out, I have to brace myself with the fear of the results, of what this could really mean for my children's health now and as an adult. Families living near oil and gas operations need and deserve every tool to protect them from this industry's harmful pollution. After a decade of advocacy for methane protection, I was thrilled to see EPA finalize federal methane rules last year, but these rules will take time to implement. The Methane Emissions Reduction Program incentivizes companies to take action now to reduce emissions. The methane Waste Emissions Charge is intended to work with the federal methane rules and updates to the oil and gas -- the Greenhouse Gas Reporting Program. These updates ensure that their reported emissions forming the basis of the fee accurately reflect emissions by

Sharyn Lie 01:19:54	incorporating real-world data. All these tools will work together to protect our children from air pollution that is disrupting our climate and impacting health. In summary, I support the Methane Emissions Reduction Program because quickly and significantly reducing methane pollution from oil and gas operations is one of the best levers we have to slow the rate of climate change now and help clean up the air to protect children's health. Every child has a right to breathe clean air and the right to a stable climate. Thank you. Thank you for your comments. Our next speaker is Judy Gayer.
Judy Gayer 01:20:07	Can you see me?
Sharyn Lie 01:20:09	Yes.
Judy Gayer 01:20:10	Okay, thank you. Hi, my name is Judy Gayer. I'm the volunteer chair of the Virginia chapter of the Sierra Club. I'm also a mom with three kids who cares about the future of our planet. I'm testifying in support of EPA's proposed Waste Emissions Charge required under the IRA, which would encourage oil and gas operators to comply with federal methane standards by assessing a reasonable fee on the largest polluters who fail to comply. The fee is designed to address large facilities with major emissions, so smaller companies with lower emission profiles will not be affected. and there are other exemptions as well. The proposed charge is not a tax on operations. Any company that observes the specified limitations will not be required to pay, even if they don't qualify for an exemption. The technology to reduce emissions is already here. Companies are already implementing these technologies, including advanced monitoring techniques and zero-emitting process controllers, and more are coming online all the time. The fact that technology is available means that avoiding this fee is completely in the polluter's control. Rather than acting as a tax that people love to hate, this is an incentive for large companies to take achievable action to reduce their emissions to the public's benefit. As we are all painfully aware, the Intergovernmental Panel on Climate Change and other experts have warned time and again that we must do much more to reduce emissions now to limit global warming as much as possible, mitigating the disastrous impact of climate change. The last few years have been the warmest years on record, and there is no reasonable scientific dispute whether this is due to human activities, including our unremitting reliance on fossil fuels. This is not some abstract risk. Millions of people around the world are already experiencing severe weather, environmental, and health impacts as temperatures continue to rise. Some experts believe it may already be too late to limit ourselves to the

opined could occur while still avoiding catastrophic climate impacts. Even if that's the case though, that doesn't mean action we take now is futile. Instead, we have reason to take even more action. Any amount we reduce our emissions now will avert even worse climate disasters, as opposed to simply staying the course. As a greenhouse gas, methane is 28 times more powerful than CO ₂ in trapping heat in the atmosphere over a hundred-year period. Rapid cuts in methane release will generate immediate climate benefits. Anoted on the EPA's website, about 1/3 of methane emissions in the U.S. come from the oil and gas sector. We cannot afford to allow this industry to maintain its current rate of these emissions if we want our children to continue to live on a habitable planet. Reducing methane emissions also offers major health benefits. According to a recent study from the BU School of Health, oil and gas production is already responsible for \$77 billion in annual U.S. health damages, including thousands of early deaths and childhood asthma cases nationwide. And we should not ignore the environmental justice benefits of incentivizing companies to reduce methane emissions. Oil and gas pollution disproportionately impacts communities of color. By adding the methane charge to [a] regulator's toolbox, we do more to protect these communities by ensuring oil and gas operators think twice before needlessly jeopardizing the health and safety of workers and communities. The fees paid by those companies that fail to remain below the threshold will go to the public and could be used to help vulnerable communities build resilience to the adverse climate impacts caused by these emissions. In addition to incentivizing companies to reduce their environmental externalities, operators that reduce leaks to avoid the charge will waste less energy, strengthen our energy security, and create jobs. It's a win-win all around. So it's both a logical and a fair action. We require the most dangerous polluters to pay for some of the harm cau		
01:24:12 Kurki. Vijay, if you are on the phone, please press * nine to raise your digital hand so you can be unmuted.		impacts. Even if that's the case though, that doesn't mean action we take now is futile. Instead, we have reason to take even more action. Any amount we reduce our emissions now will avert even worse climate disasters, as opposed to simply staying the course. As a greenhouse gas, methane is 28 times more powerful than CO2 in trapping heat in the atmosphere over a hundred-year period. Rapid cuts in methane release will generate immediate climate benefits. As noted on the EPA's website, about 1/3 of methane emissions in the U.S. come from the oil and gas sector. We cannot afford to allow this industry to maintain its current rate of these emissions if we want our children to continue to live on a habitable planet. Reducing methane emissions also offers major health benefits. According to a recent study from the BU School of Health, oil and gas production is already responsible for \$77 billion in annual U.S. health damages, including thousands of early deaths and childhood asthma cases nationwide. And we should not ignore the environmental justice benefits of incentivizing companies to reduce methane emissions. Oil and gas pollution disproportionately impacts communities of color. By adding the methane charge to [a] regulator's toolbox, we do more to protect these communities by ensuring oil and gas operators think twice before needlessly jeopardizing the health and safety of workers and communities. The fees paid by those companies that fail to remain below the threshold will go to the public and could be used to help vulnerable communities build resilience to the adverse climate impacts caused by these emissions. In addition to incentivizing companies to reduce their environmental externalities, operators that reduce leaks to avoid the charge will waste less energy, strengthen our energy security, and create jobs. It's a win-win all around. So it's both a logical and a fair action. We require the most dangerous polluters to pay for some of the harm caused by their activities if they fail to take adequate profect
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Kellie DuBay Am not seeing a hand, Sharyn, if you want to move on.		raise your digital hand so you can be unmuted.
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01:24:34	1	
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Sharyn Lie	Thanks. Shaina Oliver. You are next. Shaina Oliver.
01:24:37	
Shaina Oliver	Hi, can you hear me?
01:24:54	
Sharyn Lie	Yes.
01:24:56	
O1:24:56 Shaina Oliver O1:24:58	Thank you. I first want to start with a land acknowledgement. Moms Clean Air Force acknowledges the ancestral lands of over 574 Tribal nations, and our Colorado chapter sits directly on the ancestral lands of the Cheyenne and Arapahoe nations and over 46 Tribal nations of the Comanche, Kiowa, Apache, Shoshone, Lakota Sioux, Ute, Pueblo, Hopi, and Navajo. My name is Shaina Oliver, and I am a Colorado field organizer for Moms Clean Air Force and their EcoMadres program, as well as an Indigenous peoples' rights advocate working to advance environmental justice for communities disproportionately impacted by environmental harms while combating the climate crisis. I am here today as a mother and advocate who supports the Methane Emissions Reduction Program and the need to cut methane and other harmful pollutants from oil and gas operations across the country. Importantly, I'm an Indigenous mother of four, and we are the descendants of the genocide known as the Indian Removal Act, known to the Diné as the Long Walk of the Navajo. These type of human rights violations have deeply impacted Indigenous peoples' communities, health, wealth, and environmental well-being. The federal government is responsible for aiding, acknowledging, and insuring the honoring of Indigenous peoples' rights of Native Americans First Tribal Nations over ancestral lands. Importantly, upholding the Peace and Friendship Treaty and respecting Traditional Ecological Knowledge of all Tribal First Nations of Native Americans Indian tribes. Because of the disregard for the Peace and Friendship Treaty, environmental harms continue to impact not only Native Americans but also black Americans who lost their Indigenous identity, and those economically challenged who have been vulnerable to exploitation. As an Indigenous tribal member of the Navajo Nation, I have seen the degradation of ancestral lands, water, and air quality from the exploitation of natural resources like oil, gas, coal, uranium, helium, and many more. All communities are impacted by pol

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Sharun Lio	wildfires, and drastically reduced snow caps impacting the Colorado River, the bloodline of the Southwest states and many Tribal communities. Living in northeast Denver, my family has stayed indoors more because of climate impacts that are made worse by oil and gas operations, associated pollutants known as VOCs, volatile organic compounds, such as benzene, which benzene can worse asthma, affect lung development in children, increases the risk of cancer, immune system damage, and neurological, reproductive, and developmental problems. Scientists have known for decades that air pollution is harmful to health, and this is especially true for vulnerable populations such as older adults, people with underlying health conditions, communities of color, pregnant women, and children. Methane pollution from the oil and gas industry is fueling the climate crisis and endangering the health and safety of communities across the country. And while we are thankful for the EPA methane rule finalized last year, our work is not done. By ensuring oil and gas operators comply with federal methane standards and take action now to reduce emissions. The Methane Emissions Reduction Program is an important step towards addressing the climate crisis and protecting the health and safety of children and families across the communities. Thank you.
Sharyn Lie	Thank you for your comments. Our next speaker is John
01:29:00	Sonin. John, I believe you are online.
Kellie DuBay 01:29:21	John is here, probably just getting elevated.
John Sonin 01:29:34	I don't know if you can hear me yet?
Sharyn Lie 01:29:38	Yes, we can hear you, John. Thank you.
John Sonin 01:29:41	I'm grateful for that because I did not get the notice to join as a panelist until after I'd already been called upon. I don't disagree with everything that has been said. And maybe not to be a double negative there, I do agree with everything that's been said, and I'm grateful that the details of our demise have been so clearly pointed out by those previous comments. I don't have anything prepared, but I do want to reflect on a more philosophical position that I think is being overlooked by most of the climatic Earth system dynamics that we are overlooking. And that is the energy imbalance of our drive towards disruption of the Earth system. And I say drive towards disruption because it seems capitalism's only objective is to utilize and profit off of what exists now. And what exists now is controlling the polarity of energy in the system, which is everything around the globe. Everything has a charge. The polarity of our system is being disrupted because we are utilizing atoms, and it's, I can really get far

	out, and it's going to be impossible to come back if I don't watch it here. But we are using atoms that are being I'm sorry that are being electrically charged and were I can't even get back to where I can talk about this sensibly. The change in the polarity of our planet. Due to the fact that all this material that is being put back into the atmosphere is changing the electrical charge and as the previous speaker has spoken, that methane is the worst-case scenario gas. It's electrically discharging enough to disrupt I'm down to a minute here, to the imbalance of the polarity around the globe is causing all the resource disruption, from the climate craziness to the air emissions, and the entire planet has become drier. We I'm sorry, we need to get back to a balanced state which is where it was before capitalism started to extract resources for profit to gain. Profit is just a way to gain buy-in on the planet easier. I have to go it looks like, I'm sorry. I will wind it up just by saying
Chamma Lia	
Sharyn Lie 01:34:01	Sorry, John. We have a tight schedule. Thank you very much for your comments, but we have to move on to the next speaker.
John Sonin 01:34:08	The easier we [inaudible] extract the worse.
Sharyn Lie	Thank you for your comments. Bryan Burton is not available.
01:34:10	We're moving on to Vanessa Lynch. Vanessa?
Vanessa Lynch	Hi.
01:34:38	
Sharyn Lie 01:34:39	Hi Vanessa.
Vanessa Lynch 01:34:42	Can you hear me now?
Sharyn Lie 01:34:45	Yes.
Vanessa Lynch 01:34:47	Okay sorry. Okay. My name is Vanessa Lynch, and I'm a field organizer for Moms Clean Air Force. I live in a suburb of Pittsburgh, Pennsylvania with my husband and two children. I support the Methane Emissions Reduction Program and its mission to encourage the timely reduction of pollution from oil and gas industry to fight the climate crisis and protect public health. The reason this program is so important to me is that I've witnessed firsthand the impact the oil and gas industry has had on my community with a well pad having been fracking in a medium density residential area of my local township. The well pad is located near homes, a daycare center, an assisted living facility, and a park where my children spent many of their childhood days playing in the stream and participating in recreational sports. And as a frontline community member I'm excited by the ability of the Methane Emissions Reduction Program to cut methane and other harmful pollutants from oil and gas operations across the country. By ensuring oil and gas operators comply with

Sharyn Lie 01:37:49	federal methane standards and incentivizing action now to reduce emissions, this program is an important step toward addressing the climate crisis and protecting the health and safety of children like mine. The sooner action occurs, the sooner frontline communities experience lower oil and gas air pollution impacts, making this program a real win for Pennsylvanians. The University of Pittsburgh in conjunction with the Pennsylvania Department of Health recently conducted a number of studies to look at the impacts of oil and gas operations in Pennsylvania's frontline communities. The findings around asthma were particularly concerning. Increases in the number of asthma attacks and hospitalizations were noted up to 10 miles away from a well pad during the production phase of fracking. For families across southwest PA, 10 miles is almost all of us. By working in tandem with both federal methane rule and updates to the oil and gas Greenhouse Gas Reporting Program, the methane Waste Emissions Charge will use real-world data, which will make the safeguards even more promising. The methane Waste Emissions Charge as part of a comprehensive approach to decreasing methane and other harmful pollutants, making it vital for this program to be enacted. As a frontline community member, I enthusiastically celebrated the finalization of the new federal methane rules last year, but these will take time to implement and the Methane Emissions Reduction Program incentivizes companies to take action now to reduce their emissions. In fact, many forward-thinking companies are already retrofitting well sites with zero pollution equipment which is music to the ears of those of us who live there. Thank you for your work and continued efforts to protect frontline families like mine who are exposed to the highest levels of oil and gas pollution. We very much appreciate it. Thank you for your comments. Samantha Salazar you are up next. If you are on the phone, you need to press * nine to raise your digital hand so you can be elevated to a s
	Samantha is not on the phone. We'll say that if there is anyone else, I believe Vijay Kurki was not available during his slot, if he is now online, please raise your digital hand. We don't have Samantha or Vijay. We will move to Antoinette Reyes who was scheduled for the earlier slot, the earlier panel. Antoinette are you available now?
Antoinette Reyes 01:38:51	Yes.
Sharyn Lie 01:38:53	All right.
Antoinette Reyes 01:38:55	Thank you for letting me speak today. My name is Antoinette Reyes. I'm a health-conscious environmental advocate. I currently am an organizer for the Rio Grande chapter of the Sierra Club, which represents over 35,000 members and

supporters in New Mexico and West Texas. I am the mother of two young children, one of which developed asthma living in southern New Mexico's poor air quality. Her symptoms drastically improved when we leave the area. I would first like to thank EPA for updating the reporting standards and committing to getting more real-world empirical data to accurately assess waste. Other real-world studies have shown how much underreporting of emissions has happened especially on the Texas side of the Permian. As well as there's also been vast methane clouds throughout the San Juan and Permian basins, the two basins in New Mexico. We also have a large number of super emitters that may be part of this program. Reducing methane is the fastest, most costeffective way to slow down climate change, and oil and gas companies are the largest industrial source of methane. Methane pollution is released alongside other dangerous pollutants such as smog-causing volatile organic compounds which can worsen asthma, cardiovascular disease, and respiratory disease, as well as toxic air pollutants such as benzene which are known to cause cancer. I've heard stories from people living in Carlsbad, New Mexico that say they feel like they are suffocating in their own home because they have traditional swamp coolers instead of refrigerated air, which pulls in dirty outside air to cool the air inside. In New Mexico, we have one of the only two rural counties that made the list of the 25 most polluted for ozone, and that is because of oil and gas. And I personally live in Las Cruces, New Mexico, which is an ozone nonattainment area despite being more than a three-hour drive from the heart of drilling. A significant portion of the poor air quality here is the result of being downwind from the Permian. Thank you for committing to hold the largest polluters accountable for excessive climate pollution, and I also just want to mention the outside proportion of emissions at marginal wells. Many operators have already begun using a variety of cost-effective technologies such as zero-emitting controllers and advanced monitoring systems. I did want to highlight there are some concerns about how the netting provisions will be implemented, and I hope that the aggregate emissions in parts of communities will be looked at so that this section does not enable the creation of more sacrifice zones. The permitting exemption for flaring also allows an incredibly long delay, and I also am concerned about the plugged well exemption, as it does not require any subsequent inspections to ensure that there are not leaks. But with that being said, that some of the critical and enforceable safeguards that this goes along with this program that we can hopefully protect more communities that live and work near dangerous oil and gas pollution that jeopardizes the health and safety of workers. Reducing emissions is not only good for the air we breathe. It will also create hundreds of thousands of new

	good paying jobs in manufacturing, construction operations, and maintenance positions nationwide. Thank you, and I also want to ask if you could please consider making publicly available and searchable the funding allocations by region, as well as the metrics that you decide to measure the success of this program by. Thank you.
Sharyn Lie 01:42:59	Thank you for your comments. Our next speaker will be Stacie Slay.
Stacie Slay 01:43:28	Okay, can you hear me?
Sharyn Lie 01:43:30	Yes.
Stacie Slay 01:43:32	You can hear me and see me? Hi everybody. Thank you so much for having this public comment. It's very important. What you are doing is very important, and I support any and all restrictions and fines, and I would also recommend that instead of just penalty fines, you consider fines that would prohibit corporations from thinking well, I can pay their fine, it'll be cheap enough. Anyway, I support your work. Anything you can do to strengthen it would be good. The reason I say this is because I grew up here in the four corners New Mexico and Texas always around oil and gas. Anybody who's driven through Midland-Odessa can tell you that when driving from city limit to city limit, it smells like you're inside of an oil drum the entire time. It is hard to breathe, it burns your eyes, it's not good for anybody, and that's in an open environment. Texas is one of the worst, New Mexico is one of the worst for allowing leaky systems, leaky processes. We have the ability to tighten up all these processes, in fact, the oil and gas companies have promised to do so from the very start. They said any mess they had they would clean up, yet we find time and time again there are things like our Native peoples having to literally put their bodies in the way of the Keystone oil line project in Nebraska. One example of everywhere oil and gas tries to steamroll and tries to not let us know information like in 1836, Sir William Robert Grove invented a process that would separate water into hydrogen and oxygen. Takes less than a volt and a half of solar energy and sequestrates everything it makes in this fuel cell into tanks. I burn hydrogen, and I found that personally, hydrogen can replace oil and gas easily. We can make it in mass today. This industry reason for destroying the economy, destroying mom-and-pop businesses, all of that is just a ruse to keep their finger in a money hungry pie. We have the ability and have had the ability to be what's called a hydrogen economy. We can make it green, which requires no carbo hydrogen [hydro

	hydrogen and oxygen. There are not numerous, numerous
	petrochemicals, heavy metals, and weird gases released, polluting our air and our water. We don't have to worry about PFAS. With hydrogen, it comes apart; it goes back together 50 times the bang of gasoline. Hydrogen gets us to the moon and Mars; gasoline doesn't. Gasoline is not only dangerous health-wise and breathing-wise, it is a major cause of cancer in our country and the world today. We can get rid of it; we can get rid of it today. Everything used in the petrochemical field can be repurposed immediately, and if I can make hydrogen from a simple cell, a volt and a half, make a radio control car running around the room. I've run it through lawnmowers, cars, my gas stove, my furnace. Everything burns better on it. It's safer. The only thing you need to make it safe is required ventilation. With ventilation, the Hindenburg wouldn't have exploded. Hydrogen naturally binds to oxygen and immediately turns to water and not a flammable chemical at all. We can do this. Anything you do binds whatever will make this process happen faster. Because industry and oil and gas, they will
Sharun Lio	
Sharyn Lie 01:47:41	Stacie, thank you for your comments.
Kellie DuBay	Thank you.
01:47:43	Thank you.
Stacie Slay	Please consider hydrogen. Green hydrogen is here. We've
01:47:44	been able to do it. We can do it in mass right now.
Sharyn Lie	Thank you. Our next speaker is Joan Brown, and that will be
01:47:52	our last speaker before our break at 10:55. Joan? If you are available.
Joan Brown 01:48:15	Good morning, can you hear me?
Sharyn Lie 01:48:18	Yes.
Joan Brown 01:48:19	Great, thank you so much for your service, and thank you for working on this Methane Emissions Reduction Program waste emission as part of the methane rules. My name is Joan Brown. I am a Franciscan sister and the executive director of New Mexico and El Paso Region Interfaith Power and Light. We work with faith communities all over this area, thousands of them to address climate change, climate justice, and care for creation and communities. All of our faith traditions believe that in one form or another, loving neighbor is the core place of being a human, and that's why we're really supporting this and have been working on methane rules for over a decade now. We work heavily in solidarity with communities in southeast New Mexico, and we also have faith leaders in northwest New Mexico. New Mexico has the designation of two NASA hotspots that were shown of methane clouds both in the northwest and the southeast. We conduct immersion retreat experiences with people of faith in

	I.,
	the Permian Basin regularly, and we've heard many, many stories. Many of the people that even go on these retreats get headaches and feel nausea in some of the places that we visit. But we've heard many stories of people living in a block with this cancer after cancer after cancer. They're right next to oil and gas facilities. We have one pastor, one of the programs that frontline community that we work with has air monitors. We have one pastor in the heart of the oil and gas area in southeast New Mexico, very near the Texas border, and Texas has no methane rules, New Mexico does, those are beginning to help, but as we know, air knows no boundaries. But this particular pastor has health problems from oil and gas where he came from previously, and he ends up here, and he wanted air monitors for his congregants, women with children, pregnant women, and elders. So after we gave them some air monitors, he said and I need one for myself. And he had visitors from back east, and they wore K9995 masks, not for COVID but because the air quality was so bad, and they were feeling ill from that. So these rules are very important. And oversight of these rules is very important. We do need to have inspections and plug wells as well. We need to address all of this methane. At this point in the Permian Basin is in an ozone nonattainment zone, even though the EPA has not designated that, that's a plea for the EPA to do that. And currently, some of the frontline communities there are in a scientific monitoring project that even shows more clearly the extent of that. We need to do this for the health of our communities. We need to do it for financial reasons. The total cost for the health from these problems is huge and also the climate reason. In our state there are 250 rural communities in water crisis or next to dire water crises that we have to address. So I thank you for this work. We ask for these rules to be implemented now and with strong inspection and addressing plugged wells and other flaring. We need to do this for
Sharyn Lie 01:52:14	Thank you for your comments. With that, my name is Sharyn Lie, and I've been chairing this hearing session. I want to thank everyone who shared their comments so far today on EPA's proposed action. At this time we're going to take a short recess. We will resume the hearing in five minutes at 11:01, so thank you everyone for keeping us pretty much on schedule. Thank you.
Melissa Weitz 01:52:44	Do we have any other panelists on? Yes. Okay, perfect. Welcome back from the break. My name is Melissa Weitz. I am an environmental policy analyst in EPA's Office of Atmospheric Programs, and I am now chairing this session of the Waste Emissions Charge for petroleum and natural gas systems virtual public hearing. I would like to ask our next

	group of EPA panelists to introduce themselves. We can start with Amy.
Amy Hambrick	Hi everyone, my name is Amy Hambrick. I'm a physical
01:53:15	scientist in EPA's Office of Air Quality Planning and
01.33.13	Standards. Thanks, Melissa.
Jameel Alsalam	Hi there. My name is Jameel Alsalam. I'm an economist in
01:53:26	EPA's Office of Atmospheric Protection.
Melissa Weitz	Thank you. A quick reminder about providing testimony.
01:53:36	When I call on you to speak, you will receive an invitation to become a panelist on Zoom. You will need to accept the panelist invitation when it pops up on your screen. You will then have the ability to unmute your line. While you are providing testimony, you are also welcome to activate your camera by clicking on the "start video" icon. If you are joining by phone and I call your name, please press * nine to raise your digital hand to let us know you are here. You will then press * six to unmute and speak. Please state your name for the record. A four-minute timer will start when you state your name. If you are testifying by phone, the facilitator will alert you when you have one minute remaining. To be fair to everyone we are going to try to strictly enforce the four-minute limit. We will now begin with the speakers in Group 4 as listed on the slide. I think we need the next slide please. I
M 0	believe Joan just spoke, so is Mary Sasso available?
Mary Sasso 01:54:48	Yes. Can you hear me? Awesome. Thank you, everyone. My name is Mary Sasso, and I'm an attorney at Clean Air Task Force, a global nonprofit organization working to safeguard against the worst impacts of climate change by catalyzing the rapid development and deployment of low carbon energy and other climate protecting technologies. I would like to first express my gratitude to everyone at EPA who has dedicated so many hours to creating this important proposal and organizing these hearings, so thank you so much. Reducing methane is the best tool we have at our disposal to rapidly bend the climate curve. The oil and gas sector is the largest industrial emitter of methane pollution in the United States. Reducing methane emissions from the oil and gas sector is an absolutely essential step to meeting domestic and global decarbonization goals. With the passage of the Inflation Reduction Act, Congress recognized this critical need and provided a path forward by including the Waste Emissions Charge as part of the Methane Emissions Reduction Program. EPA's proposal at issue today is a commonsense application of the plain language set out in the Inflation Reduction Act. The Waste Emissions Charge was designed to be synergistic with EPA's section 111 rules for the oil and gas sector, encouraging early adoption of proven reduction technologies and practices, and emissions reductions from sources otherwise not covered by the section 111 rules. Together the policies will help operators to be proactive in

	reducing methane pollution. In fact, the thresholds present in the language of the Inflation Reduction Act and in EPA's proposal reflect industry drive targets for which many operators have independently stated their goals and intentions to meet. EPA must swiftly and thoughtfully implement the program to achieve methane emissions reductions in a timely manner as required by the law. If done properly, the Waste Emissions Charge has the ability to promote the rapid adoption of well proven pollution mitigation measures that will eventually be required under the section 111 rules. The charge will do this by providing operators with options, either reduce polluting emissions or pay a fair price. We encourage EPA to ensure that in the final rule, robust verification processes for emissions reporting are put in place. The charge will only be effective if reporting by operators accurately reflects their applicable emissions, and verification systems are necessary to prevent any gaming of the reporting system. Combined with EPA's proposed improvements to reporting for subpart W of the Greenhouse Gas Reporting Program, Waste Emissions Charge reporting can provide a clear and more transparent picture of what industry emissions actually are. Again, I'm very grateful for this space to discuss the opportunities available to EPA in finalizing a strong rule, and thank you all so much for your time.
Melissa Weitz 01:57:48	Thank you for your comments. Any questions from the panelists? If not, we will move onto our next speaker, Mark Smith.
Kellie DuBay 01:58:14	Mark is here, so he is probably just being elevated.
Melissa Weitz 01:58:17	Yes. We can see Mark but cannot hear him yet.
Mark Smith 01:58:20	Can you hear me now?
Melissa Weitz 01:58:21	Yes, thank you.
Mark Smith 01:58:23	Okay great. My name is Mark Smith. I'm from Clean Connect.Al. We are one of the advanced methane detection and quantification solutions. So, the timeline proposed by the WEC is problematic. Oil and gas operators are supposed to have started collecting data January 1st of this year, using the new rules based on OOOOb, OOOOc, subpart W, and the WEC. That's over 2,500 pages of new rules that aren't finalized yet. In addition, the alternative technology approval process hasn't even started, leaving operators to choose technology to help implement WEC reporting but risk that advanced technology won't be approved. So, currently the first report is due on March 31, 2025, based on 2024 data. So, wouldn't it make sense to start the data collection on January 1, 2025, after the EPA rules have been finalized?

Malia a Mari	This will give operators a chance to implement finalized empirical rules and technology. Then the first report would be due on March 31, 2026. This gives operators time to understand the new rules and choose approved alternative technology to help implement the rules. Thank you.
Melissa Weitz 01:59:46	Thank you for your comments. Any questions from our panelists? If not, we will start with our next speaker, Lisa DeVille.
Kellie DuBay 01:59:58	Lisa, if you are joining us via phone please hit * nine to raise your digital hand to let us know you are here, and we can unmute you. I'm not seeing a hand go up, Melissa, so if you want to call on our next speaker.
Melissa Weitz 02:00:20	Thank you. Our next speaker is Ranjana Bhandari.
Kellie DuBay 02:00:25	I think the same situation. Ranjana, if you are participating by phone hit *nine to let us know you are here, that will raise a digital hand. I'm not seeing a hand go up, Melissa, if you want to call our next speaker.
Melissa Weitz 02:00:44	Great, our next speaker is Autumn Crowe. Autumn, you are on mute, if you are trying to talk.
Autumn Crowe 02:01:03	Am I the next speaker?
Melissa Weitz 02:01:05	Yes.
Autumn Crowe 02:01:06	Sorry, I was converting to panelist, so I lost you for a second. Okay. My name is Autumn Crowe. I am the Deputy Director of West Virginia Rivers Coalition. West Virginia Rivers is a statewide nonprofit that engages communities in advocating for policies based on sound science to protect our environment and public health. West Virginia Rivers supports the Environmental Protection Agency's proposed Methane Emissions Charge for Petroleum and Natural Gas Systems within the Methane Emissions Reduction Program. Oil and gas companies are the largest industrial source of methane. West Virginia ranks in the top five gas producing states in the country. As we near the completion of the mountain valley pipeline coupled with the fact that our region has been targeted for a blue hydrogen hub using methane as the feed stock, methane emissions in West Virginia are likely to increase. EPA's methane emission charge is critical in reducing greenhouse gas emissions in this region. In the Appalachian region, oil and gas pollution disproportionately impact the elderly and low-income communities. According to a report by Environmental Defense Fund, a third of West Virginians live within a half mile of an oil and gas site. Alongside methane, oil and gas operations release other hazardous air pollutions and volatile organic compounds which can worsen respiratory diseases. West Virginia ranks highest nationally for prevalence of heart attack and coronary heart disease, has the second highest cancer mortality rate,

	and is among the worst ranked for chronic respiratory disease making residents extremely vulnerable to pollution. EPA's methane Emission Charge is critical in reducing our resident's exposure to these harmful air pollutants. With these enforceable safeguards in place, we can protect environmental justice communities and those living on the front lines of the extractive industry by ensuring that dangerous oil and gas pollution will no longer jeopardize the health and safety of workers and the communities living closest to these industries. Reigning in methane pollution from the oil and gas industry is the fastest most cost-effective way to slow the rate of climate change and avoid the further escalation of severe weather events such as wildfires, drought, and floods. In West Virginia, climate change often expresses itself through water, specifically with extreme rainstorms and flooding. West Virginia has one of the highest flood risks in the country, and in a report by First Street Foundation, nearly one in four properties in the state were found to be at high risk of flooding with 80 percent of residential properties at high risk. Implementing these waste emission charges to cut methane pollution is not only good for the air and climate. It could also create thousands of new, good-paying jobs in West Virginia in the methane mitigation sector. West Virginia consistently ranks among the poorest states in the nation. The 2020 census found 17 percent of West Virginians were living below the federal poverty threshold. Historically, West Virginians have not' been able to share sufficiently in the wealth that they help to create. For generations we have watched as our natural resources have been shipped out due to the nation's energy needs. EPA's Methane Emissions Reduction Program presents a once in a lifetime opportunity to curb methane emissions, to mitigate the climate crisis, while creating good-paying jobs and protecting public health. We are grateful to EPA for establishing these commonsense fees to reduce meth
Melissa Weitz	Thank you for your comments. Any questions from the
2:04:58	panelists? If not, thank you. We will move to our next
K # D D	speaker, Lucia Valentine.
Kellie DuBay 2:05:11	Just for folks following along we heard from a few preregistered speakers, they are having technical difficulty.
Lucia Valentine	Thank you so much. Good morning and thank you for the
2:05:21	opportunity to testify today. My name is Lucia Valentine, and I
	am the West Virginia field organizer for Moms Clean Air
	Force. I'm from Shepherdstown, West Virginia and I have
	lived in mountain state my whole life. I strongly support the Methane Emissions Reduction Program and the need to cut
	methane and other harmful pollutants from oil and gas
	operations across the country, and by ensuring that oil and
	gas operators comply with federal methane standards and

l l	take action new to reduce emissions. This presume is an
Melissa Weitz 2:08:02	take action now to reduce emissions. This program is an important step towards addressing the climate crisis and protecting the health and safety of children and families across West Virginia. Reducing methane pollution is the fastest most cost-effective way to immediately slow our current rate of global warming, and oil and gas companies are the largest industrial source of methane. So, methane is responsible for 25 percent of the manmade global warming we are experiencing today and warmer temperatures caused by climate change will make air pollution worse, putting the health of West Virginia's children at risk. Climate change is impacting our families and communities across West Virginia. We are seeing firsthand the effects of climate instability on our most vulnerable populations. Children and older folks and their health is compromised in communities of color and low-income communities. West Virginia is one of the most at-risk states for flood disasters in the country and increase in frequency and severity of flooding can be directly tied to the warming that is caused by greenhouse gases. The Methane Emissions Reduction Program Easte Emissions Charge, which was mandated by Congress in the Inflation Reduction Act is a commonsense fee that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution. This fee also incentivizes companies to take action now to reduce emissions and, in fact, many forward-thinking companies are already retrofitting well sites with zero emission equipment. Leading companies have already pledged to limit emissions below the Waste Emissions Charge pollution threshold and would avoid being subjected to the fee if those commitments are met. Quickly and significantly reducing methane pollution is one of the best levers we have to slow the rate of climate change now and help clean up the air to protect our children's health. Moms Clean Air Force is grateful for the work of the Biden Administration and the EPA to finalize methane standards. Last, the
Ángel Esparza	Esparza is available. Yes. Thank you. Can we start?
2:08:32	·
Melissa Weitz 2:08:35	Would you mind speaking up a little bit? The volume is a little low. Thank you.
Ángel Esparza 2:08:40	Can you hear me now? Is it better? No?

Melissa Weitz	Yes, now it is good. Thank you.
2:08:47	, , ,
	It's better now, okay gotcha. Okay. Can we start? Okay. Well, thank you for the opportunity to speak today. My name is Angel Esparza, and I am the vice president of Regulatory Sustainability and Technical Services for Encino Environmental Services. I have more than a decade of relevant technical and regulatory experience in the oil and gas sector and I have a doctorate in environmental science and engineering. In addition I'm a licensed professional engineer in the state of Texas. Encino environmental services provides a suite of solutions for the oil and gas sector. Encino specializes in emissions performance testing for a variety of pollutants and greenhouse gases. Also, the company provides leak detection technology and services as well as continuous emission monitoring systems, high resolution satellite methane detection and advanced environmental data software. Encino's mission is to help energy companies improve climate performance while enhancing regulatory compliance and profitability. Encino will be providing more detailed comments through the docket, but today I would like to focus on suggesting an advanced technology implementation credit, proposing a rule implementation delay, and adding definitions to further clarify some concepts. First, Encino considers that the oil and gas industry has prioritized the use, research, development, and implementation of technological innovation aiming to reduce the loss of product and consequently reducing methane emissions. Encino believes that the rule must provide a path for owners and operators to claim a credit for any applicable Waste Emissions Charge, or WEC for short, if they have proactively used advanced technologies towards eradicating emissions from each of their facilities. Second, Encino acknowledges that the WEC will depend on the actual accounting driven by the Greenhouse Gas Reporting Program. This is mathematically expressed in Equation B-6 of the proposed rule. Given that a part of that is currently under review after receiving a round of comment
	implementation of the WEC for the 2025 reporting year instead of 2024, therefore having the report due March 31, 2026. Third, Encino suggests adding to section 99.2 a definition for facility efficiency, and if appropriate, indicate that
	definition for facility efficiency, and if appropriate, indicate that is a synonym with methane emission intensity. The proposed rule indicates that these terms refer to methane emissions for unit of production or throughput. Similarly, Encino suggests adding definitions of applicable threshold, and state that is a

	synonym with waste emission threshold, which is indeed is the final [inaudible]. These definitions will provide greater clarity and reduce ambiguity. In summary, Encino acknowledges the efforts associated with the Soho energy transition. However, Encino believes the energy transformation in which all forms of energy have a space and can provide the necessary redundancy during normal and challenging times. Encino believes that these regulatory actions must incentivize the use and development of advanced technologies rather than taxing their way toward energy transformation. Thank you for the opportunity to provide input of this proposed rule, which is aimed to reduce emissions of the oil and gas sector. We look forward to providing more detail with our comments in the docket. Thank you.
Melissa Weitz 2:12:41	Thank you for your comments. If there aren't any questions from the panelist, we will call on our next speaker. Next speaker is Ranjana Bhandari. Ranjana, it looks like you are connected. You can unmute yourself whenever you are ready.
Ranjana Bhandari 2:13:30	Thank you, my name is Ranjana Bhandari and I am speaking for Livable Arlington, a grassroots environmental organization focused on advocacy for a healthy livable community and a livable future for our children. Arlington, a city with 400,000 people living in its 99 square miles, lies on top of the Barnett Shale in Tarrant county. We have four hundred gas wells using hydraulic fracturing in sites an52d the numbers are growing very rapidly. The setback of 600 feet is always reduced to 300 feet by the city which means gas wells and infrastructure like major compressor stations are located next to daycares, homes, schools, and medical offices. In our County of Tarrant close to one million out of 2.1 million residents live less than half a mile from fracking sites. The second largest number of residents so exposed in any county in the U.S. Emissions from fracking are linked to higher rates of asthma, one in five Tarrant County children have asthma and birth defects. Once again Tarrant County has the highest rate of birth defects of any similar county in Texas. Of the Barnett Shale counties, Tarrant alone has approximately 7,300 gas wells. When the TCEQ state regulator did a tally of Barnett compressors and equipment, they topped 8,600 a few years ago. More than 30,000 Arlington children go to public schools within half a mile of wells and fracking infrastructure and almost 8,000 infants and toddlers attend daycares within that radius. 85 percent of public-school students are children of color and more than two thirds live in poverty. All together more than half Arlington schools and daycares are within half a mile of active gas production. Fracking is an environmental justice issue. We have optical gas emitting camera for emissions from three compressor stations and large multi-well pad sites in Arlington and Fort

	Worth that we have tracked over the last eight years. Despite many complaints to TCEQ, these continue to leak and vent methane and other accompanying hazardous compounds like Benzene right next to schools and homes. A high-level EPA Region 6 delegation that visited here last year viewed some of these sites. In 2007, the TCEQ raised the amount of the VOC Benzene it considers an acceptable level of exposure for permitting purposes, doubling it to 54 parts per billion for brief periods and increasing it 40 percent for longer durations to 1.4 parts per billion. During a monitor project in Barnett Shale, despite this liberal yard stick, TCEQ employees discovered benzene above that reckless yard stick in nearly a third of 64 sites where they tested. The passage of a new law in Texas allows the TCEQ to now ignore pollution complaints especially from residents who have filed complaints in the past. Often citizens file multiple complaints because a facility continues to violate their air permits or a situation is not remedied. So what I'm trying to say here is we need other new measures to stop large scale fracking emissions. Action here by the EPA to impose financial costs on polluters who continue large-scale emissions that negatively affect our health and climate will help improve the quality of life for a million of us in Tarrant County. In fact, we humbly request that the fines for this level of pollution for urban drilling in densely inhabited places like
	Arlington be higher than they are for the rest of the country. We thank you on behalf of our community for this opportunity.
Melissa Weitz 02:17:34	Thank you for the comments. We will move to our next speaker, Lisa DeVille, what you been able to join? Please raise your hand if you have been able to join the session.
Kellie DuBay 02:17:52	Lisa if you are on the phone you can do that by hitting * nine. I do see a hand. Let's see. There is a hand. Lisa, is that you? You can hit * six. Lisa, is this you? Lisa, are you on the phone?
Lisa DeVille 02:18:29	Can you hear me?
Kellie DuBay 02:18:31	We can. Is this Lisa DeVille?
Lisa DeVille 02:18:34	Yes, I got a new phone. I was trying to get used to the buttons, sorry.
Kellie DuBay 02:18:41	Lisa just so you know, we have a four-minute timer that will start and we will let you know, since you can't see the screen I'm assuming, we will give you a one-minute warning.
Lisa DeVille 02:18:50	Okay. That's fine, it's not that long.
Kellie DuBay 02:18:53	Okay.
Lisa DeVille 02:18:56	Okay. Hi, my name is Lisa DeVille, I'm a role member of the Mandan, Hidatsa, and Arikara Nation. I and my family live in the heart of North Dakota oil and gas fields on the Fort

Melissa Weitz	Berthold Reservation. I currently serve as a state representative for district 4A which encompasses my entire reservation. I'm also a co-creator and vice president of grassroots group Fort Berthold Protectors of Water and Earth Rights. I am speaking to you today to show support for strong implementation of the Methane Emissions Reduction Program. Where I live, oil wells around us, so does the associated pollution. On my reservation methane pollution is a major climate and environmental justice issue because my people are forced to breathe the pollution from flaring, venting, and leaking along oil and gas wells on our ancestral land. I have been working on regulation surrounding methane for more than a decade, and it appears that regulation alone don't solve this issue, which is why I support the MERP emissions charge. The Methane Emissions Reduction Program charge, if implemented properly, will force large polluters to pay for methane emissions by forcing large polluters to pay the MERP reduction charge makes large polluters examine their practices and find ways to innovate which will result in reduced pollution. Thank you for the opportunity to speak. Thank you for your comments. Any questions from the
02:20:43	panelists?
Jameel Alsalam	Thank you.
02:20:48	
Melissa Weitz 02:20:52	Great. We have run through our speakers. We have some extra time. I will invite some of the speakers that have volunteered to go earlier or joined in progress. Laurie Anderson, are you available to speak?
Laurie Anderson 02:21:11	Yes. I am available. Hi, my name is Laurie Anderson And I am a field organizer with Moms Clean Air Force. I live in Broomfield, Colorado. Thank you for this opportunity to share with you today. I am a mom of five with my youngest now a teenager. We live about a half mile from a large-scale oil and gas development site with 18 horizontal wells and near several other well paths. Like so many other moms, I support the Methane Emissions Reduction Program and the need to cut methane and other harmful pollutants from oil and gas operations across the country by ensuring oil and gas operators comply with federal methane standards and take action now to reduce emissions. This program is an important step toward addressing the climate crisis and protecting the health and safety of children and families across the country. Ideally, oil and gas operators would have already seized the opportunity to reign in their methane emissions realizing that the health of our planet is at stake and that less waste means more energy in the pipeline. In fact, many leading companies have already pledged to limit emissions to levels below those subject to the fee and just need to implement their plans. However, sometimes it takes a financial impact to swiftly

bring about much needed change and the good news is there are cost-effective technologies that could be rapidly implemented to reduce methane emissions and subsequently avoid the fee. Methane, the main ingredient in natural gas, is a powerful greenhouse gas pollutant that is fueling the climate crisis. Climate change is already impacting our families and communities in Colorado through extreme weather events, hotter summers, aridification, decreased snowpack. A couple years ago, the Marshal fire ripped through communities burning over 1,000 homes in the dead of winter. With each new red-flagged days, where high winds and fire danger coincide, our communities relive the very real danger of another destructive scenario. Air pollution created by oil and gas operations contributes to ozone smog that can damage lungs and trigger asthma attacks. Broomfield is in the severe ozone nonattainment area that spans from Denver along the northern front range where the top contributor of ozone precursors is oil and gas operations. Ongoing heat waves only exacerbate the ground-level ozone pollution problem. These ozone action days and climate impacts will likely intensify if reducing climate changing pollution is not rapidly and effectively addressed. Colorado, along with New Mexico, has been leading the way on regulations that reduce methane pollution, and operators have been successfully implementing technologies that reduce methane pollution such as advanced monitoring techniques and zero-emitting process controllers. Fortunately, the Waste Emissions Charge working cohesively with both federal methane rules and updates to the oil and gas Greenhouse Gas Reporting Program will ensure the reported emissions that form the basis of the fee accurately reflect emissions by incorporating real-world data. Together, these rules will work to safeguard our climate, protect public health, and create good-paying iobs. My family is fortunate to live in Colorado, where we continue to proactively take steps to reduce methane emissions from oil and gas operations. However, all children across the nation need these same protections, and these federal rules really will make a difference. Once again, I support the proposed EPA Methane Emissions Reduction Program with Waste Emissions Charge, which will hold the nation's largest oil and gas polluters accountable for excessive climate pollution and thereby help protect our children's health in the future. Thank you for your time. Thank you for your comments. Are there any questions from

Melissa Weitz 02:24:53

Thank you for your comments. Are there any questions from the panelists? If not, we are ready to move into Speaker Group 5. All right. So Lucia provided testimony from the previous session. Grace Smith is our next speaker. Grace, are you available?

Grace Smith 02:25:34	Hi. Thank you. Good morning, my name is Grace Smith and I am an attorney for the Environmental Defense Fund. Thank you for the opportunity to speak with you today about EPA's proposal to implement the Waste Emissions Charge for the oil and gas sector under the Methane Emissions Reduction Program. As part of the 2022 Inflation Reduction Act, Congress created MERP and Clean Air Act section 136, including the WEC in order to reduce methane and associated air pollution from oil and gas facilities. Methane is a climate pollutant with over 80 times the global warming power of carbon dioxide in the near term and the oil and gas sector is the largest industrial emitter of methane. The oil and gas industry is also the largest human cause source of volatile organic compounds nationally and a significant source of hazardous air pollution, both of which can cause severe negative health consequences for communities living near oil and gas sites. Cutting methane and air pollution will have vital benefits for our climate and communities. Within MERP, Congress established clear directives to EPA for administering the WEC, including a requirement to assess the fee in 2024 at set thresholds and provide exemptions once EPA has determined that certain conditions have been met. Congress designed the WEC to complement the EPA's recently finalized methane standards for the oil and gas sector by providing exemption for operators who are in compliance with the standards if they are sufficiently protective and in effect in all states. Operators that adopt cost-effective and widely available mitigation technologies can not only work towards full implementation of EPA's
Melissa Weitz	eliminate their fee obligation. Can we ask you just to slow down for our interpreters and
02:27:12	closed captioner a bit please?
Grace Smith 02:27:18	Yes.
Melissa Weitz 02:27:19	Thank you
Grace Smith 02:27:20	Congress also included 1.5 billion dollars in funding in MERP for communities, states, EPA, and operators to monitor and reduce emissions. By ensuring that the WEC and MERC funding work hand in glove with EPA's methane standards Congress has intentionally set up a powerful framework to reduce the impacts of methane and local air pollution and addressed the climate crisis. We are encouraged to see that EPA has set forth a statutorily aligned proposal for implementation of the WEC. First, EPA proposes to implement the regulatory compliance exemption as directed in the statute by ensuring it is only available once final standards and plans as strong as EPA's 2021 proposal are in effect in all states and by requiring operators to demonstrate

	full compliance across their facilities. This comports directly with the plain language of MERP. It will be important for EPA to establish a rigorous process to compare whether final standards and plans achieve equivalent or greater emissions reductions. Second, EDF also supports EPA's proposal to establish criteria for operators seeking to claim an exemption for an unreasonable delay in permitting. Congress directed EPA to determine when the exemption becomes available if and when a reasonable delay has occurred as determined by the Administrator. Creating such criteria is thus directly authorized by Congress. Third, EPA has proposed to require demonstrations from operators seeking an exemption for plugged wells if their wells have been properly plugged in accordance with all state and federal requirements and are no longer polluting. EDF supports EPA's proposal for this exemption, including that it apply to the production segment and believes EPA can strengthen its requirements for submitting documentation demonstrating compliance with regulations. Fourth, we support EPA's protocol for verifying Subpart W reports and other information within WEC filings, as they will work to ensure that exemptions are only available once the conditions Congress set forth are met and that fee obligations reflect accurately reported emissions. We encourage EPA to start auditing WEC filings earlier than November 1st. Finally, we encourage EPA to swiftly finalize this proposal lays out an appropriate framework for administration
Melissa Weitz 02:29:57	of the fee in accordance with Clean Air Act section 136. Your time is up. Thank you very much and we encourage you to submit your comments to the docket as well. Okay, our next speaker is Matt Holmes. Matt, if you are listening in can
Kellie DuBay	you raise a hand by dialing *9? I don't see a hand going up, Melissa.
02:30:27	
Melissa Weitz 02:30:31	Okay. So the next speaker is Linda Stenholm. I will also ask Linda to raise a hand dialing * nine if she is available.
Kellie DuBay 02:30:49	I don't see a hand as well, so we can move to our next speaker.
Melissa Weitz	Okay, next speaker is Alice Lu. You may also be on the
02:30:43 Alice Lu	phone. So again, dial * nine if you are available, Alice. Hi I'm here.
02:31:11	THE THICK
Melissa Weitz 02:31:14	Great, thank you.
Alice Lu 02:31:16	Awesome. Hi, everyone, I'm Alice Lu. I am the policy coordinator for Clean Air Council and Environmental and Public Health, a nonprofit working across Pennsylvania and the surrounding region for over 50 years to improve air and water quality. I thank the EPA for hosting this hearing and for proposing the oil and gas Waste Emissions Charge. It's well

known that reducing methane pollution is one of the fastest and most cost-effective ways to rapidly slow global warming. As the largest industrial source of methane emissions, the oil and gas industry should be a major focus for reductions. Pennsylvania is the second largest gas producing state in the country and would benefit greatly from associated methane emissions reductions. The WEC is a common-sense fee that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution and help ensure operators comply with federal methane standards in a timely fashion. In the final rule EPA should continue to base common ownership for the purpose of netting on whether facilities are under the same owner or operator, and not the parent company. A major concern regarding netting emissions across facilities is that operators could use facilities with lower emissions to offset excess emissions from other facilities. This could be particularly dangerous to front line communities that are impacted by hazardous air pollutants that accompany methane emissions from the oil and gas industry. To reduce the risk of incentivizing operators to pollute certain communities, EPA should consider limiting the scope of netting emissions from a common operator by state, rather than nationally. Doing so could reduce the environmental and health impacts on the vulnerable front-line communities. EPA should also continue to make the regulatory compliance exemption available to WEC applicable facilities only once all states have implemented final methane standards and associated plans that are as strong as what would have resulted from EPA's 2021 new and existing source proposal. EPA should also require operators to demonstrate full compliance with all aspect of the standards once state plans are approved, including any requirements that have future implementation deadlines that have not vet elapsed. This could prompt operators to comply with rules well ahead of implementation of state plans and help achieve regulatory compliance as early as possible. Although this rule sets a much-needed foundation holding operators of large pollution sources accountable, there are still areas that could be strengthened. The permitting delay exemption should be more protective, exemptions should be granted by EPA on a case-by-case basis and EPA should require operators to demonstrate that the requested gathering or transmission pipeline is completely necessary for gas off take. Specifically, operators should be required to demonstrate that no other means of gas rerouting, on site usage or storage is feasible before EPA can grant the unreasonable delay exemption and prevent the flaring of impacted gas. Additionally, as suggested in the WEC proposal, EPA should clearly establish that no litigationrelated delay is considered a reasonable delay and thus cannot contribute to the delay timeline. EPA should also

	require that any operator applying for the well plugging
Malia a Matin	require that any operator applying for the well plugging exemption show that wells are properly plugged in accordance with all requirements and are no longer polluting. Providing exemption for plugged wells could incentivize the practice but operators must prove they are properly plugged to avoid leaking methane in the future. Thank you for considering my comments. Clean air Council is happy to provide additional suggestions and information in our written comments.
Melissa Weitz 02:35:15	Thank you for your comments. Our next speaker is Tammy Murphy. Tammy, are you available? You can press * nine if you are calling in. Okay, looks like she is unavailable.
ERG Webinar host 02:35:44	Tammy is available. She is just joining shortly.
Melissa Weitz 02:35:45	Thank you.
Tammy Murphy 02:35:51	Sorry, I am here. Just to let you know, when you prompt a person as a panelist, it takes you out of the screen for a couple minutes so that might be one of the reasons people were delayed. Let me just pull up my notes here. So, I'm Tammy Murphy, I am the advocacy director for Physicians for Social Responsibility in Pennsylvania. And thank you for having me here, pronouns are she/her. I want to be supportive of the reduction of methane because it does help to slow down the speed of climate change. These goals for methane reduction are however decades late and we have no time to waste with any further delays. I am somewhat disappointed that the Greenhouse Gas Reporting Program or the Subpart W seems to be almost totally reliant on industry self-reporting and only the most heavily polluting facilities are going to face charges. My concern is that smaller facilities are going to face charges. My concern is that smaller facilities are not having to face charges and residents and workers are still left to deal with VOC's, benzene, and radiation. The existing legally accepted radioactive emissions levels are far too high and not aligned with public health guidelines for exposure. The constant level of exposure to radiation present throughout the entire industry puts workers and residents at risk. Resolving some of the worst methane emissions is helpful but it's not enough to keep us safe as Ranjara Bhandari so effectively described in the previous session. If the EPA and state agencies such as DEP in Pennsylvania were well-staffed, better equipped, and required to do regular frequent inspections for methane emissions I think that they would find much more than what would be found by self-reporting required in the Greenhouse Gas Reporting Program, Subpart W. Such inspections could include detection of radioactive emissions and speciation of the different hydrocarbons to detect VOC's and Benzene, et cetera. These exposures are more directly impacting residents and workers and disproportionately affecting

Malia a Maite	women, children, and communities of color. I agree with the previous speaker's point about netting and I think it's a very big concern that there could be a loophole created especially if they are done on some kind of a national scale. It puts residents and workers in direct danger. Although I support the Methane Emissions Reduction Program, Waste Emissions Charge proposal, I think it's very important to recognize that it does not do enough to avoid the health issues that result in morbidity and mortality. Thank you.
Melissa Weitz 02:38:42	Thank you for your comments. Any questions from the panelists? If not, thank you. Are there any speakers from Group 5 who weren't available previously that are now available that would like to provide their comments?
Kellie DuBay 02:39:01	We had two, Matt Holmes and Linda Stenholm. If either of you are joining my phone feel free to hit * nine to raise your hand to let us know that you are here. And Melissa, there are at least one speaker, there is one speaker from a previous group with our previous chair that we noticed is here. So, if folks, if you were scheduled to speak in a previous time slot and you missed your time slot and would like to speak you could also raise your hand and the chair can call on you as well.
Melissa Weitz	If you are scheduled to speak later, I believe we can also, if
02:39:56	you want to volunteer to move up your speaking time, you can message us in the chat for that as well.
Kellie DuBay 02:40:11	Yeah, that's a great point. If you are interested, yeah, please, to help us with speaker management to put that in the chat and let us know you are here and would like to go earlier. Okay, I'm seeing a few names in the chat that are asking to speak earlier. So, Melissa, if you would like to call on Becca Edwards.
Melissa Weitz 02:40:43	Sounds great. Our next speaker is Becca Edwards, and after Becca, we will have Ashley Korenblat. Becca, are you available?
Becca Edwards 02:41:01	I am available. I'm ready to go.
Melissa Weitz 02:41:03	Thank you.
Becca Edwards 02:41:05	Good morning, my name is Dr. Becca Edwards, I'm the Climate Impact Fellow at Texas Impact and the general board of the Society of United Methodist Church. Both organizations represent people whose faith informs their participation in the public sphere. People of faith care about preserving a clean safe environment that supports the health and dignity of both people and the natural world. Waste methane emissions threaten environmental quality by causing poor air quality and contributing to climate change. In November I was present at the U.N. Climate negotiations when the Biden Administration announced the new methane rule. These rules are an important step forward in the fight

	against climate change and environmental justice. The methane Waste Emission Charge is an important way for the federal government to enforce the new methane rules. It will ensure much-needed accountability for methane emission reductions for the oil and gas industry. I support this charge because it is part of a larger narrative about the U.S. taking climate change seriously. For too long industry has been able to release methane directly into the atmosphere as a routine part of operations. This practice has had significant environmental and human consequences. The Waste Emissions Charge is a sensible measure that will place the cost of methane pollution where it belongs, on oil and gas producers, rather than on communities of people who live near oil and gas facilities or on current and future generations who must contend with the impacts of climate change. The Waste Emissions Charge incentivizes oil and gas producers to take action to reduce methane emissions. This will cause immediate improvements to environmental quality. These improvements can be made using equipment that is readily available so the burden on producers is not unreasonable, especially given that federal funds are available to support this work in some cases. It is time to stop allowing polluters to dump methane into the atmosphere we all depend on with no consequences. The waste emissions fee is a sensible complement to the methane reduction provisions in the Inflation Reduction Act. People of faith in Texas care about the wellbeing of current and future Texans and support strong methane regulations and support the Waste
Melissa Weitz 02:43:43	Emissions Charge as a means of enforcing them. Thank you for your comments. Any panelist questions? We will move to our next speaker, Ashley Korenblat followed by Chris Richards followed by Betsy Lawson. Thank you. Ashley, are you available?
Ashley Korenblat 02:44:07	Can you hear me?
Melissa Weitz 02:44:10	Yes, thank you.
Ashley Korenblat 02:44:11	Okay, great. My name is Ashley Korenblat, and thank you for the opportunity to comment. I'm a recreationist economy consultant. I founded a non-profit, Public Land Solutions, that works directly with communities who want to add outdoor recreation to their economic development strategies, we work with land manager, local elected officials, stakeholders including business owners, user groups, school officials. This work is about both increasing visitation and tourism in these communities that would like more visitors and also about improving quality of life for all residents and attracting business investment. Growth and remote work and demand for outdoor access and the desire to live near healthy ecosystems has become a major economic driver for rural

	communities who are currently transitioning from oil and gas and coal and for those who have the foresight to look ahead to a time when oil and gas royalties will no longer fund county budgets and resource extraction jobs will decline. It's natural for local and state elected officials to feel the need to protect existing industries and businesses. It's also somewhat understandable businesses want to avoid expenses especially on a declining asset like an oil well. I've had conversations with oil and gas developed who explained that they did not want to go back to their out-of-state headquarters to ask for another \$5 million to capture more methane in an oil field they were no longer investing in but rather only producing from. This tendency of local and state officials to protect these developers is doing real harm to communities most dependent on oil and gas, even though this issue is poised to hurt statewide recreation economies, both those that are established and those that are emerging.
Melissa Weitz	For example, Salt Lake City has attracted companies like Goldman Sachs and Adobe precisely because of the high quality of life that nearby public land provide, yet air quality remains a major issue and is poised to undermine the current booming economy. To protect economies in similar communities it is clear that producers will not take these steps voluntarily. That's the only workable method for reducing methane emissions to require them to think beyond current profits and the Waste Emissions Charge has the real potential to do this. Air quality effects economic prospects making this Waste Emissions Charge essential for future progress both a healthy climate and healthy economies. Thank you for your comments. If there are no questions from
02:46:41	the panelists we will move to our next speaker, Chris Richards.
Chris Richards 02:47:20	Hello. Can you all hear me?
Melissa Weitz 02:47:23	Yes, we can, thank you.
Chris Richards 02:47:29	Okay. Anyways, I've been in the oil and gas dealing with methane. Why isn't it coming up? I couldn't show it. Anyway, I have been in the oil and gas industry for 45 years. I've worked upstream, downstream, I've worked for some of the largest in the world. Those are the ten most profitable companies in the world, the majority are oil and gas, I don't know if you know that. Natural gas in the United States is by far the largest producer. No one comes close. I don't know if you know natural gas exports have been going up like a rocket. Right. I think there's more leaks. I don't think the laws are even near strict enough, I started a program in the Northeast over ten years ago. I developed it from the ground up for a big energy company. Pennsylvania had stricter laws. Before OOOOa even came out. After retiring I got my own

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	OGI camera, cost like \$100,000, this is my personal. What I'm getting to, I went to that workshop, this was like in 2021, there were 12 speakers. Ten of them had a Ph.D. Not one of them mentioned where I found most of my leads. You know what a compressor is? A larger one, cat motor, 3506 or 3516, they have like 5,000 horsepower. They are inside a building. That's where most of your moving parts are. Think about more likely where your leaks will be. If you have your tanks, pipes, sitting here and outside, actuators, they aren't moving. That engine is moving at high RPM's and vibrating and you will have leaks on your valves. A lot of times when they do most of the maintenance, that too, right? That's where I found most of my leaks. A lot of times I would do maintenance, and they would leave a bleeder open, didn't tighten the valve caps enough. They have to have packing around the cylinder for the compressor and that has to be changed out. A lot was after they did maintenance, the leaks were there. They are supposed to inspect the compressors and then report it to the LDAR division so they can repair. And they are supposed to do an inspection with the camera but they don't always tell them. That's why I came to this conclusion. They need like a central agency. EPA is central. LDAR agency division is funded 100 percent by oil and gas companies, not our tax dollars or any part of EPA's budget. Most of the funds come out from those that make billions in profits. Just like the IRS, these companies should get surprise audits to make sure no greenhouse gas escapes in the atmosphere. With today's technology, Al, visual studio coding, GPS technology, and areas in poor service who use satellite, audit could be done remotely. But to do this you would have to use an OGI camera and Bluetooth, using LDAR technicians. In other words, someone in Washington DC could be sitting there watching data without having to be on location and have their in-house auditor. And then turn in their door list. You probably don't know what that i
Melissa Weitz 02:51:51	Thank you very much, and please to provide your written comments as well. I will move to our next speaker. Betsy Lawson and then following Betsy we will move onto Speaker Group #6.
Betsy Lawson 02:52:20	Hello. My name is Betsy Lawson and I am participating as a resident of West Virginia. I urge the EPA to hold oil and gas operators responsible for climate warming greenhouse gases. West Virginia has at least 6,500 documented orphaned and abandoned wells across the state and thousands more undocumented, making Appalachia is big

	source of greenhouse gas emissions. I have an abandoned well in my own yard dating to 1912. When I held a methane detector to it, the reading was beyond what the detector could measure. I contacted a state DEP inspector who came to confirm my reading and told me it would cost about \$120,000 to plug my well and that doing so would be a pretty low priority for them. I have since tested other abandoned and working wells and got readings over 10,000 ppm at all of them, the highest possible reading on my detector. Diversified Energy is the largest owner of gas wells in the United States having bought up a lot of low or non-producing wells across Appalachia and beyond claiming they can make the wells productive again. According to Ted Betner of the Ohio River Valley Institute, Diversified's business model makes full use of federal and state tax credits, unusual accounting practices, and extended schedules for decommissioning of wells. The problem here is the dismal lack of inspectors in Appalachian states. No one has any idea of how many Diversified's wells are producing and how many are just leaking methane and other pollutants. We need more funding for more inspectors to find out what their annual waste emissions are. Diversified especially has become a company too big to fail and if they go belly up, Ohio, Pennsylvania, and West Virginia taxpayers could be stuck with a billion-dollar mess. Any regulation that forces them to account for all their emissions from their many wells, to have to pay a Waste Emissions Charge, might go a long way to holding them accountable for what may be an untenable business. Thank you to the EPA for the opportunity to speak and for taking this issue seriously. Thank you.
Melissa Weitz 02:54:52	Thank you for your comments. Are there questions from the panelists? If not, thank you to all of the speakers that spoke in this Speaker Group 5 time slot, and we will now move to Speaker Group 6. Our first speaker is Irene Burga. Irene, are you available now?
Kellie DuBay 02:55:35	Irene is here, Melissa, so it may just take her a moment.
Irene Burga 02:55:38	Hi. Yes, apologies. I was figuring out Zoom. Thank you so much for having me here today. I go mostly by my Spanish pronunciation of my name Irene, [ee-REH-neh] Burga, but you can also call me Irene. I'm the climate justice and clean air program director at GreenLatinos, and we at GreenLatinos are fighting for environmental liberation of the Latine community across the United States. I am here today to speak in support of EPA's proposed Waste Emissions Charge as part of the Methane Emissions Reduction Program or MERP. Many of our members that GreenLatinos represent live in communities that are directly and disproportionately impacted by pollution coming from oil and gas and are communities that are at the frontlines of also the impact of climate change being accelerated by methane

emissions from oil and gas. Recent data, as you all may be aware, shows that approximately 1.6 million Latines live within a one-half mile radius of an active oil and gas facility in the U.S., which represents the radius of populations living in proximity of oil and gas development that are most likely to be affected by hazardous pollutants like benzene, which is a known human carcinogen, and volatile organic compounds, which we know exacerbate and accelerate respiratory illness like asthma. People living in majority Latine neighborhoods are also dangerously exposed to particulate matter levels, which are contributed by the oil and gas industry. Latines in the U.S. tend to live in regions that are being devastated by natural disasters that were made more extreme because of climate change and are affecting deeply our communities and our outdoor workers that are mostly Latino. In my hometown community based in Whittier, California, which forms part of Los Angeles County, we are no strangers to the adverse impacts of oil and gas. Whittier is a primarily Latino community that is surrounded by the oil and gas industry. Growing up near the Santa Fe oil field and seeing the active oil rigs in the Whittier hills was commonplace and having witnessed the impacts on my community from exposure to these polluting sources with friends and family suffering from respiratory illness. I have seen firsthand how damaging air pollution caused by these toxic sources can be to the health of our communities and our families and how they further exacerbate inequities in our society. So the Waste Emissions Charge is a critical incentive for operators to reduce their emissions by minimizing leaks and relacing equipment. Our communities have shouldered the burden of this pollution for years, and this waste charge rights the places where the burden, to change --sorry. It changes the burden on the operators, and these methane emissions reductions need to happen as quickly as possible. And the Waste Emissions Charge under MERP provides an important measure for earlier reductions in concert with the recently passed and extremely vital EPA methane rule, which was passed last year and finalized. With critical and enforceable safeguards, we can protect environmental justice community and those living on the frontlines by ensuring dangerous oil and gas pollution will no longer jeopardize the health and safety of our workers. These rules are just common sense, and they work really well with other rules that have been passed, as well as the currently considered FIMSA rules. And the communities living closest to extraction would be thankful. Thank you for your time. Thank you for your comments. Our next speaker is Thomas Caffery. Thomas, if you are available, please press * nine. I'm not seeing a hand go up, Melissa.

Melissa Weitz 02:59:32

Kellie DuBay 02:59:55

Melissa Weitz	Ashley spoke in our previous session. Becca Edwards, if you
03:00:00	are available
Kellie DuBay	Becca was also able to join us earlier.
03:00:09	
Melissa Weitz	Okay. The next speaker is John Fitzgerald. John, could you
03:00:14	press * nine? I see John here. Great.
John Fitzgerald 03:00:33	I am here, and can you hear me?
Melissa Weitz	Yes, thank you.
03:00:37	
John Fitzgerald 03:00:38	Excellent. Then I will proceed. Thank you for the opportunity to testify. I am testifying today on behalf of myself, although I'll recommend a couple of organizations to the EPA whose work I'm involved with and helped direct. In this regard, one is the Center the Climate Impact Environmental Impact Fund Climate Intervention Environmental Impact Fund Climate Intervention Environmental Impact Fund, sorry, CIEIF.org. It's a fairly new organization. It's begun to make grants of \$50,000 and more to people who were developing methodologies for removing methane and other greenhouse gases from the atmosphere and using other interventions. Another organization is the Climate Protection and Restoration Initiative run by Jim Hanson's lawyer and policy advisor. Jim Hanson is on the board of advisers. I'm vice president of the board of directors. I recommend their work to you in this regard, in particular in order that you might fulfill the mandate of section 136(a)(3),(e), and (f), which give you the authority and appropriate funds through 2028 for the development of methods of addressing legacy pollution, methane in the atmosphere, and near sources of leaks is a form of legacy pollution specifically targeted by that section and many others in the IRA by the way. The USDA has three separate programs, one of which has 19 billion dollars alone for helping rural communities in any number of ways to remove methane, and CO ₂ , and other greenhouse gases. So you need to work with other agencies of course, but use your own authorities first. Integrate those with the other elements of the IRA with the Clean Air Act and the Toxic Substances Control Act, which hands you a number of tools since it's reauthorization in 2016, in the Lautenberg version, that you can bring to bear here too because we're about solving this problem, not for pinning blame. Now you can use the proceeds obviously as you said in the very last sentence of your proposed rule description of it, to do this. This is wonderful news. Great stuff. I commend t

	fuel so that it is not wasted. So those are just two of the many development things under development now. Mark also, the National Academy of Sciences study that began last year and will be completed this year of ambient atmospheric methane removal methods. They already had a marvelous two-day workshop, October 17 and 18, that you should review the video of online at the National Academies. And Matt Johnson and his crew from Copenhagen and others have laid out ways that they are going to be using a variety of means to remove methane from the ambient atmosphere. As you know, just under two parts per million, which is about 3 times more than 2.5 times the historic level. So you have got a great deal of opportunity here. This is the sort of spear point for a lot of this in regard to methane. I commend you for what you propose to do. The regulation you proposed is good, but do include in the final regulation a timetable for assessing these various methods and integrating them into the required methods for oil and gas production companies. I have 20 seconds left. I am happy to respond to any questions. Thank you.
Melissa Weitz 03:04:26	Thank you for your comments. Any questions from the panelists? Thank you. Our next speaker is Katie Muth. Katie, are you available? If you are on the phone, please press * nine.
Kellie DuBay 03:04:53	I'm not seeing a hand go up, Melissa, but our next speaker is here.
Melissa Weitz 03:04:57	Great. So we'll pass it to Kayley Shoup, our next speaker.
Kayley Shoup 03:05:13	Hello, can you folks hear me?
Melissa Weitz 03:05:16	Yes. Thank you.
Kayley Shoup 03:05:18	Hello. My name is Kayley Shoup, and I am a community organizer with Citizens Caring for the Future, which is a small grassroots environmental advocacy group based in southeast New Mexico in the heart of the Permian Basin. As you all know, the Permian is the most active oil field in the country and where the last barrel of oil will likely be pumped one day. The Permian is the definition of a sacrifice zone. In New Mexico overall, 53 percent of people of color or approximately 80,000 people live within a half mile of oil and gas wells. And despite being a resource-rich state, New Mexico ranks third in the nation with the highest poverty rate. In southeast New Mexico, despite our state having nation-leading methane rules, we still suffer from abysmal air quality. Recent data gathered by a team of research scientists working with the Health Effects Institute has recently found 31 days in which ground-level ozone levels surpassed the Environmental Protection Agency's eight-hour National Ambient Air Quality Standards of 70 parts per billion.

	Sadly, the Permian is not yet considered a nonattainment zone by this Agency, despite the overwhelming proof that we should be. I say this all to underscore the fact that strong federal regulation is needed in order to truly reign in methane pollution and save our climate. Agencies must use every tool in the toolbox, and these WEC regulations are a useful tool to be utilized, although they must be truly applicable, and they must be enforced. In the Permian that I often refer to as the "wild, wild West," we see firsthand how failures to enforce regulation has consequences. It is not an out of sight out of mind issue for us. Not to mention, regulations must be enforced if they're going to do the impossible task of making any difference on overall emissions in a place like New Mexico that has seen a 190 percent increase in oil and gas production over the past five years. Lastly, I would like to thank you for these regulations, as strong federal oversight makes a huge difference in a place like southeast New Mexico the lack of any pollution controls. Care for the climate and care for community in west Texas has a direct impact on the air we breathe. Emissions do not know borders, and those of us in southeast New Mexico are grateful for anything the EPA does to help us breathe easier. Thank you for your time.
Melissa Weitz 03:07:24	Thank you for your comments. If there aren't any questions, I will ask any of the other speakers for Speaker Group 6 that have not spoken yet, please let us know that you are here, and we will get you on. We canlet's see.
Kellie DuBay 03:07:51	There are some folks from the next group that may be ready to speak now, so we are going to do a quick check with them and see if they would be ready to move their time slots up if that's okay with you, Melissa.
Melissa Weitz 03:08:06	Yeah. That's great. I'll remind those that are listening if you have a later slot and you are interested in speaking earlier, you can send us a chat and we can see if we can slot you in earlier.
Kellie DuBay 03:08:22	We do see that there are about three speakers from Speaker Group 7 who are available now, so you may be getting a message in the chat. If you are okay with it, Melissa, we'll advance to the Speaker Group 7 slide if that's okay.
Melissa Weitz 03:08:38	Yep. That sounds great.
Kellie DuBay 03:08:40	Okay. So there are some folks from this list who are here now. If folks are here and are ready to speak, okay, it looks like we have somebody who is ready. I believe speaker 47 is available if you want to call on that speaker, Melissa.
Melissa Weitz	Okay. Great. Lindsay Garcia, we'll make you a panelist, so
03:09:00 Lindsay Garcia 03:09:10	you can speak. Great. Can you hear me all right?
Melissa Weitz	Yes, thank you.
<u> </u>	

03:09:11 Lindsav Garcia My name is Lindsay Garcia, and I serve as the director of 03:09:13 communications for the Evangelical Environmental Network and Young Evangelicals for Climate Action. Thank you for taking the time to consider my testimony and for acting swiftly to propose this rule that will cut methane and other harmful pollutants from new and existing oil and gas production. As a Christian, I care deeply about these proposed standards that have the potential to benefit both God's creation and defend the health of our communities, particularly children and those on the frontlines of climate change. I am also a proud Coloradan who has seen firsthand the consequences of methane pollution and the rapid warming resulting from greenhouse gas emissions. In Colorado, over 288,000 people live, work, and go to school within a half mile health threat radius of active oil and gas operations. This statistic is particularly relevant to those living in Weld County, the top oil producing county in Colorado, the county where I grew up, and a place many of my friends still live. I am especially concerned for the over 46,000 children in Weld County who find themselves exposed to methane and associated toxins that have been linked to an increased risk of congenital heart defects, brain, spine, and spinal cord defects, cancer, low birth weight, and other significant reductions to infant health. Methane also has more than 80 times the warming power of carbon dioxide over the first 20 years after it reaches the atmosphere, making it a significant contributor to the human caused warming we are experiencing and will experience in the near term. Here in Colorado, we are no strangers to the destructive effects of climate change. From record-setting droughts that impact millions, to historic wildfires that destroy our rich natural resources and fill our air with dangerous smoke. It is clear that the need to address methane emissions is both crucial and urgent, which is why I am grateful to the Administration for proposing a rule that will implement the methane Waste Emissions Charge program and encourage oil and gas companies to cut dangerous emissions while creating new family-sustaining careers to detect, plug, and prevent wasteful leaks from wells. To ensure EPA's implementation of the fee fulfills Congress's goals outlined in the historic Inflation Reduction Act, the final regulation must continue to include the following key requirements. One, regulatory compliance exemptions that are only available after final standards and plans are in effect and all states and plans are at least as strong as the EPA's 2021 methane emissions proposal. Strong and clear criteria that remain in place for operators seeking an exemption based on unreasonable permitting delays. For operators

seeking an exemption for plugged wells, a clear

demonstration that wells have been properly plugged and are

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	no longer polluting, transparent calculations and methodologies to accurately determine an owner or operator's net emissions, and strong verification protocols that ensure fee obligations accurately reflect reported emissions and guarantee exemptions are only available once the conditions Congress has set forth are met. Our communities, including our children, deserve clean air and the promise of a safe climate future. I am grateful for the EPA for recognizing this critical health need with its Waste Emissions Charge and urge the Agency to finalize a strong rule as soon as possible. Thank you for your time and your work on this important matter.
Melissa Weitz	Thank you for your comments. Let's see. So we'll move to
03:13:02	our next speaker, Chris Digiulio. Chris, are you online?
Kellie DuBay	It says that Chris is with us, and I have reached out so
03:13:25	hopefully Chris is able to speak now.
Melissa Weitz	Oh, okay. I'll also ask if anyone who is registered to speak
03:13:33 Kellie DuBay	later that would prefer to speak earlier, you can let us know. Also just a reminder if folks are not registered to speak but
03:13:54	would like to share a public comment, you can let us know that you would like to speak by reaching out to us using the chat and sending a message to attendee support, or you can email our meetings@erg.com. Melissa, if you want to oh, we do have somebody who has just reached out to say that they are in Speaker Group 8 after the break but is ready to go now.
Melissa Weitz 03:14:37	They are ready to go, if I am understanding that correctly, so if Patricia is available, can we make her a panelist? Okay. Great. Based on what I am seeing in the chat, Patricia is available and interested in speaking now. She'll be up next and then Bill McNally, followed by that might be it for now. Oh, wait. Never mind. Potentially followed by Caroline Alden. I may be confusing some logistical things, but it looks like Patricia is on, so Patricia, whenever you are ready.
Patricia Garcia Nelson 03:15:32	Awesome. Thank you. This has never happened to me that we are ahead of schedule. Good morning, everyone. My name is Patricia Garcia Nelson. I and the daughter of Ophelia and the granddaughter of Maria [inaudible]. When I thought about where I would raise my son, I wanted him to live and have a childhood like I did in Colorado, but instead, I had to learn about the health impacts of oil and gas, air quality monitoring methodology, and how to navigate a bureaucratic system that was made to keep out people like me. I have been very, very fortunate that I have been able to turn my activism into a career, and today I am the Colorado fossil fuel just transition advocate for GreenLatinos. We are a nationwide nonprofit that helps, and we are fighting for everybody's environmental liberation. As I was saying, I moved back to Colorado after living in Louisiana and having the misfortune of living in Lake Charles, Louisiana, where we

	had about five petrochemical plants, and there was the addition of another one when I was pregnant with my son. And I thought there is no way I could raise my son, so I moved back to Colorado in 2016. Just four months after being here, I learned there was going to be an oil and gas site built behind his school. There are still wells at Bella Romero, and we are still seeing active emissions from the well site behind the school. The reason I bring that up is because a lot of the time we are told that we need to see the harm being done to our communities. Well the thing in Colorado is when you get to about 25 degrees, you don't need special equipment to see emissions off the sites. And that's how bad I'm just painting the picture of how bad things are in Colorado. When I grew up, blue skies, clean air. Now I am having to constantly check the weather to decide if I'm going to let my son play outside. That is reality for a lot of us. Here in Colorado, one of our colleagues or one of our partners, Protégete, created a policy handbook. The research they did found that residents in areas identified as high Latino counties have higher rates of hospitalization, our children miss more school, our community members miss more days of work. Across the U.S., 1.8 million Latinos live within a half mile of an oil and gas facility. I really want to encourage the Agency to take this rule as far as they can go because in reality the reality is that the fastest way to improve our air quality and to protect our communities is to simply stop the wasteful emissions that have been happening across the country. I live in Weld County in northern Colorado. We were the highest producing oil and gas county in Colorado and sometimes in the country. Now, oil and gas is winding down, and we are just left with all of this pollution. One of the ways that we can also help communities like mine is by creating auditor programs, and I feel like that is the best way to help the workforce transition as well. My family members work in oil and
Melissa Weitz 03:19:28	Thank you for your comments. Our next speaker will be Bill McNally followed by Caroline Alden. Bill, are you available?
Bill McNally	I'm ready.
03:19:46 Melissa Weitz	Yes, thank you.
03:19:48	

Bill McNally 03:19:50

All right. Thank you. I am Dr. Bill McNally, a 40-plus year resident of Colorado where I have been exposed to extremely high levels of ozone. For the last 15 years, I have had a persistent cough. I have been through five different doctors, two GPs, a pulmonologist, an ear, nose, and throat, and an allergist. I have passed every test that they have thrown at me. My lung capacity is fine. There's no weird anomalies in my sinuses or nasal passages. The allergy test shows that my body reacts normally to most environmental stimuli. The pulmonologist and the ENT gave up after I endured months of their different prodding and poking. The allergist refused to. My symptoms are here to stay. On days when pollution or particulate matter are high, my cough gets worse. When smoke drifts over the mountains from wildfires, either in state or out of state, my cough becomes almost constant. For almost two years, my allergist tried almost every treatment that was standard for breathing issues. asthma issues, and other allergy issues. They all failed. This drove him crazier than it did me, as I had been putting up with this for so long. That is when he had a revelation. He prescribed to me a neurosuppressant, Gabapentin, which is an anticonvulsant. Two days after I started taking the drug, smoke rolled in, and I didn't cough at all. However, there is a drawback to me taking this drug. My wife is getting ready to retire. Her employer carries our health and life insurance. As a result, I tried to acquire life insurance. I tried four different brokers, all resulting in the same reason for refusing me. I take Gabapentin. As far as the insurance companies are concerned, I have epilepsy, the overwhelming reason for the drug to be prescribed. What it really is, my body has a severe negative reaction, the cough, to the contaminants that emanate from oil and gas wells and other polluting sources. Though there is no test to prove it, I am basically allergic to ozone. Ozone is chemically derived from methane exposed to sunlight. Where a previous speaker has already stated. almost a guarter of the state is in severe ozone nonattainment. That is the source of my cough and the reason for many millions of people across this country that have compromised respiratory systems. The Environmental Protection Agency's charters ensure that the air, water, and land are safe. I implore you to make these regulations as tough as possible. Make these fees as high as possible. These operators have been skating by for doing as little as possible to clean up after themselves. Make these fees as high as possible. This will help to make sure that the industry cleans up the current wells but also the abandoned wells that are spread across this country, as all our lives are at stake. Make the industry pay for the damage that they have done to the environment. Thank you for allowing me to speak.

Moliogo Woit-	Thonk you for your comments of these secretarions from
Melissa Weitz	Thank you for your comments. If there aren't questions from
03:23:19	the panelists, I will invite Caroline Alden, our next speaker, to
	join us.
Caroline Alden	Okay. Let's see. Okay. Hi, my name is Caroline Alden. I'm
03:23:44	the co-founder and the chief scientist at LongPath
	Technologies. Thank you for the opportunity to comment
	today on the proposed ruling, which is the Waste Emissions
	Charge or the WEC. So LongPath Technologies provides
	continuous methane emissions monitoring for oil and gas
	equipment across the supply chain. Obviously, the primary
	reason to do this is to help operators find leaks and fix them
	and find site design issues and fix those too. LongPath uses
	laser fencelines to measure methane flow, providing an
	accurate top-down quantification of total sitewide emissions.
	By measuring continuously through time, we capture the
	intermittent nature of emissions, which bottom-up inventories
	currently cannot do. This has been documented in the peer-
	reviewed literature. Currently, neither the proposed revisions
	to subpart W nor the proposed WEC allow for the use of top-
	down empirical sitewide methane emissions measurements
	such as can be provided by aerial surveys, drone mass
	balance flights, and open path continuous line sensors like
	LongPath. I would therefore like to comment on the
	opportunity for the Administrator to prescribe methods for
	top-down empirical measurements of emissions to be used
	for calculating the WEC fees owed. In the Inflation Reduction
	Act, it is stated in section 136, subsection (h) that the
	Administrator shall quote, "allow owners and operators of
	applicable facilities to submit empirical emissions data in a
	manner to be prescribed by the Administrator to demonstrate
	the extent to which the charge under subsection c is owed."
	When the Administrator proposed revised requirements to
	subpart W in August of last year, the standard historical
	precedent of bottom-up tabulation of emissions was
	·
	maintained. In other words, the subpart W proposed revisions
	did not go so far as to create a novel framework for top-down
	emissions reporting within the GHGRP. Many stakeholders
	agreed that that was to be expected. Subpart W was built as
	a method to sum emissions from the bottom-up at a
	component-by-component level. As EPA is aware, the
	methane world is experiencing rapid revolutions toward what
	is being called measurement-informed inventories or MII.
	This combining of bottom-up with top-down emissions
	information is happening everywhere, from the Colorado
	methane intensity verification program to the international
	OGN2.0 reporting program. And the reason that
	measurement informed inventories exist and are growing in
	importance is that it is extraordinarily difficult to accurately
	calculate total facility wide emissions from the bottom-up
	alone. Paper after paper shows this is the case. This doesn't
	mean that the proposed revisions to have empirical data

Maliana Waite	added to subpart W aren't important. However, the gold standard for accurate total emissions reporting is top-down and bottom-up measurements together. We therefore read the second clause of section 136, subsection (h) to mean that outside of and separate from their subpart W reporting requirements, owners and operators of applicable facilities should be able to use accurate top-down measurements to demonstrate the extent to which Waste Emissions Charges may or may not be owed. We urge the EPA to ensure that the final WEC rule language reflects what we believe is the intended language of the IRA to allow for empirical top-down sitewide measurements in the calculation of the WEC charge. Thank you
Melissa Weitz 03:27:16	Thank you for your comments. Any questions from the panelists? If not, we'll move into Speaker Group 7. Glen spoke earlier. Kindra Snow-McGregor is up next. Kindra, could you press * nine on your phone if you are calling in to let us know you are here?
Kellie DuBay 03:27:50	I'm not seeing that hand go up, Melissa.
Melissa Weitz	Okay. Lindsay spoke earlier. Teresa Carrillo, if you are
03:27:53 Kellie DuBay	available, could you please press * nine? Again, not seeing a hand go up.
03:28:14	Again, not seeing a nand go up.
Melissa Weitz	Okay. Chris Digiulio? Could you press * nine if you are
03:28:19	available? We'll go back and make sure they haven't joined later.
Chris Digiulio 03:28:39	I'm ready.
Melissa Weitz 03:28:40	Oh perfect.
Chris Digiulio 03:28:42	This is Chris Digiulio. I had to get switched on as a panelist. I'm on a cell phone. All right. Thank you. Hi, my name's Chris Digiulio from Physicians for Social Responsibility Pennsylvania. I am their environmental chemist, and I am here to talk about the WEC. As everybody has been saying, I am supportive of reducing methane pollution in the fastest and most cost-effective way to immediately slow the current rate of global warming and as oil and gas companies are the largest industrial source of methane. One of the jobs I have, also I heard a speaker earlier that was talking about using the FLIR OGI optical gas imaging camera and listed some interesting information to where the leaks are, which is one of the things I'm experiencing and seeing. I also support know that typically, oil and gas pollution disproportionately impacts communities of color, in such spaces as Pennsylvania where I'm from, and others, as well as low-income and elderly low-income communities and elderly people in for example Appalachia, [inaudible]. So one of my main concerns in this right now, and of course in supporting the reduction of

	methane, is also understanding that the waste charge is being used as a way, or possibly a deterrence, but a way to
	actually have the oil and gas be accountable for what we
	already know has been going on for a while. One of the
	things I know in my work is that when scientists actually go out and measure the emissions in a location. This is, for
	example, in Pennsylvania, the emissions measure always
	much higher than the emissions estimated. I hear a lot of
	the understanding is we are already baselining way below
	what it actually is. When we are looking at a self-regulating,
	self-reporting methodology with this, it concerns me that we don't have a method for validating it at all. And knowing that
	not much has changed, the budget at the EPA and for us at
	the DEP and the staff numbers haven't changed, and I'm not
	sure if there are plans to do that in order to help validate
	some of this information. Being that we have seen that this
	industry is basically a serial offender of environmental laws and of human rights when it comes to small communities,
	and we're trying to protect the health and safety of public
	health. And it doesn't seem like a lot of this data is actually
	it's more getting stuck into, oh yes, we can do it, let's get
	some better technologies and let's get some rules on the
	book but in essence, being a scientist on the ground seeing this, that's supposed to be already better rules that aren't
	being calculated properly. I almost wonder how the
	baselines, to say that we have improved on it, where that
	number comes from. I really think, as one of the other
	speakers was talking about, was having the best technology available because these companies are not poor. They
	should be using the best available, and that should be written
	into this law for calculating these emissions. That would help,
	and I also want to encourage the EPA to start validating
	these sites themselves. Because we do need to, as watchdogs, have somewhere to go to when we're reporting
	this information and somebody who is going to do something
	about it. From what we have seen out in the field, it is higher
	than what has been reported, so I want to make sure that we
	are starting from at least a good knowledge base first. And that makes me feel better about these charges, so I thank
	you for your time.
Melissa Weitz	Thank you for your comments. Our next speaker, Jozee
03:32:35	Zuniga. Jozee, if you are on the phone, would you press * nine please?
Kellie DuBay	I am not seeing a hand go up, Melissa.
03:33:05	Thenk you Detain and a sellen as Local town the Dill
Melissa Weitz 03:33:08	Thank you. Patricia spoke earlier, so I will turn it to Bill Bradlee, our next speaker if he is available.
Bill Bradlee 03:33:36	Good morning or afternoon. Can you hear me okay?
Melissa Weitz	Yes. Thank you.
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03:33:40 Bill Bradlee Wonderful. Thanks for the opportunity to speak today. It was 03:33:41 really interesting to hear some of the earlier speakers as well. My name is Bill Bradlee. I am a senior organizing director for the nonprofit, Interfaith Power and Light. Interfaith Power and Light's mission is to inspire and mobilize people of faith and conscience to take bold and just action on climate change. We recognize that people of all faiths and spiritual traditions share a common bond to care for their neighbor and the planet. I'm here today to speak on behalf of my organization as well as our state affiliates and the millions of people of faith who take part in our national network. I know you will also hear from many of our state affiliate leaders tonight. The Methane Emissions Reduction Program's Waste Emissions Charge, which was mandated by Congress under the Inflation Reduction Act. addresses a problem of wasted methane in a thoughtfully designed process that will both support and hold accountable the largest oil and gas producers for excessive climate pollution in the form of wasted methane. I have two primary points to make regarding this rule. First, climate change is a justice issue. Around the world, we see the climate impacts like floods, wildfires, and stronger storms unfolding. These impacts have been projected for decades by scientists, and they commonly hurt the poorest and the most marginalized communities who have done the least to contribute to heat-trapping greenhouse gases like methane. So we need to address climate change, and this fee on the largest methane polluters is a part of that climate solution puzzle. Reducing methane pollution is the fastest and most effective way to immediately enact a solution. And the oil and gas companies are the largest industrial source of methane. Our work on this in the United States also helps set a bar for efforts in other countries to reduce their methane emissions and meet the global methane pledge because we all know this is a global problem. My second point here, global methane pollution is growing at historic rates, and it's currently at an all-time high. Last year saw the largest year over year increase on record, and it's a growing challenge. And it is important to note that methane pollution from oil and gas development is released alongside other dangerous pollutants, such as smog-causing VOCs, which can worsen asthma, cardiovascular disease, and respiratory disease, as well as toxic air pollutants such as benzene, which is known to cause cancer. So with enforceable safeguards in place, including this fee, we can protect environmental justice communities and those living on the frontlines by ensuring that dangerous oil and gas pollution will no longer jeopardize the health and safety of workers and the frontline communities living close to these facilities. And again, I'm sure you'll hear more about this from some of our

Melissa Weitz 03:36:55	state affiliates that have folks that have experienced these harms. Overall, we urge the EPA to quickly finalize this proposed rule after consideration of these comments. The proposed rule lays out a sensible framework for the administration of a fee on methane that is currently being wasted and is causing great harm to our communities and those that we love. Thank you for the opportunity to testify today. Thank you for your comments. Any questions from the panelists? I will ask Ashley Miller, our next speaker, to join us. Ashley, if you are on the phone, can you please press * nine?
Kellie DuBay 03:37:22	I'm not seeing a hand go up, Melissa.
Melissa Weitz 03:37:25	Okay. Thank you. I'll again ask if Kindra, Teresa, or Jozee have joined us, if you could raise your hand by dialing * nine. If not, we have a speaker that has volunteered to go early, so I will turn it to Jaime Butler. Again if anyone listening in would like to speak earlier than their slot, feel free to message us in the chat. Jaime, are you available?
Jaime Butler 03:38:09	Yes. One second.
Melissa Weitz 03:38:11	Yep. Thanks.
Jaime Butler 03:38:53	Sorry about that. Hi, my name is Jaime Butler, and I'm the communications associate at the Evangelical Environmental Network and our partner ministry, Young Evangelicals for Climate Action. Thank you for the opportunity to speak today, and thank you for acting swiftly to propose a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. As an evangelical Christian committed to defending life, I strongly support the EPA's proposed Waste Emissions Charge. Methane has more than 80 times the warming power of carbon dioxide over the first 20 years after it reaches the atmosphere. Millions of people across the U.S. and around the world are experiencing record heat and suffering severe health impacts as a result. Slowing today's unprecedented rate of warming can help avert climate risks, such as wildfires and other extreme weather. The consistency and negative impacts of extreme weather is something we can no longer ignore. It is impacting every region nationwide, and there are no longer people who are safe or exempt from extreme weather events caused by a warming climate. Even just this past week, we saw dangerous flooding in California and a severe storm system in the Midwest, which included the first ever recorded February tornado in my home state of Wisconsin. Medical research shows that exposure to methane is also associated with congenital heart defects, a 25 percent increase in children's asthma, and 86 times exposure to known cancer-

Melissa Weitz 03:42:38	causing chemicals. New geospatial analysis released by Earthworks and FracTracker shows that more than 17.3 million people, including 3.9 million under the age of 18 live, work, and go to school within a half-mile health threat radius of active oil and gas production operations. I have already experienced too many friends, neighbors, and family members suffer and even die from asthma attacks, heart conditions, and cancer. How many more people will we allow to fall victim to extreme weather events and polluted air when there are measures like this one that have the power to do something, to have a positive impact on our collective health and wellbeing, and defend our most vulnerable communities? I'm a Christian, friend, daughter, sister, coworker, and citizen who strives to love my neighbor. Out of this love is borne a responsibility to use my voice to show support for measures such as this that will mitigate climate warming and clean our polluted air. To ensure that EPA's implementation of the fee fulfills Congress's goals, the final regulation must continue to include key requirements, including that regulatory compliance exemptions only become available after final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for an exemption must also demonstrate full compliance across their facilities. Strong and clear criteria must remain in place for operators seeking an exemption based on unreasonable permitting delays, and when operators seek an exemption for plugged wells, they must clearly demonstrate that their wells have been properly plugged and are no longer polluting. Transparent calculations and methodologies to accurately determine an owner or operator's net emissions and strong verification protocols so that fee obligations accurately reflect reported emissions and that exemptions are only available once the conditions Congress set forth are met. Our children and families deserve clean air. I am grateful t
	joined, please send us a message so that we can get you into the speaker lineup. Clara, if you are available?
Clara Sims 03:43:06	Sorry, it took a minute to rejoin the call. My name is Clara Sims. I am an ordained minister in the United Church of Christ and the assistant executive director of New Mexico and El Paso Region Interfaith Power and Light. As we work with faith communities all over the state, we have born witness for years to the impacts that are difficult and

Melissa Weitz 03:45:07 Rita Beving	dangerous of methane pollution, especially in our regions like the Permian Basin, which is one of the largest oil and gas producing regions in the entire world. New Mexico has a long legacy of being a sacrifice zone to extractive industry with the most harmful impact of that extraction falling upon our Indigenous communities and communities of color. We all have a moral obligation to be a part of stopping this pattern of exploitation for the sake of all people and all creation. To truly see and love neighbor as self is to look beyond logics of profit and political power and understand that what harms one harms all. It is in this spirit that I ask the EPA to continue your strong work on methane and adopt the waste sorry the Waste Emissions Charge as quickly as possible. Please ensure that the implementation of this charge does not include loopholes for the largest polluters. Please include robust community monitoring so that the health impacts already experienced by frontline communities can be strengthened and addressed. We in New Mexico thank you for this urgent work that impacts us each and every day and hope that you will help us restore the health and resilience of our communities by implementing this rule with as much strength, and standard, and expediency as possible. Thank you for your time, and I yield the remainder of my time today. Thank you for your comments. Any questions from the panelists? If not, we'll move to Rita Beving, our next speaker. Rita, I think you're on but muted?
03:45:47	
Melissa Weitz 03:45:51	Yes, thank you.
Rita Beving 03:45:52	Thank you. My name is Rita Beving, and I live in the nonattainment area of Dallas-Fort Worth in what has grown from a four county nonattainment area to more than twice as many counties suffering from poor air quality since 1991. Basically DFW has continued to be in nonattainment for decades. I served on the North Texas Clean Air Steering Committee years ago to help develop the SIP to clean up the
Melissa Weitz 03:46:25	I think you froze, Rita.
Rita Beving 03:46:27	Excuse me? Hello?
Jameel Alsalam 03:46:37	I think Melissa may have froze, but Amy and I can still hear you. You can continue.
Rita Beving 03:46:42	Okay. Recently, the EPA has accepted comments for our region, which has been bumped up from serious to severe, for the 2008 NAAQ standards. We are now in an area of accepting comments for the 2015 NAAQ standard because Dallas is going to be bumped up from moderate to serious for air quality. That is all to say I am grateful and supportive of

Melissa Weitz	the new methane rules released this past December and the newly proposed methane fees we are discussing today. Both of these rules are tools in the toolbox to save Texas frankly from its polluting self, due to officials and bureaucrats that continue to prop up the oil and gas industry which has largely remained unchecked over the years. Let me give you an example of a DFW city experiencing a surge in urban drilling in the Barnett Shale. It is the city of Arlington. Arlington is in Tarrant County, home to almost one million out of 2.1 million residents living within less than a half mile from fracking sites. This population represents the second largest county of residents living near fracking areas in America. Tarrant County has one of the highest rates of childhood asthma in the state and in the country. It also has the highest rate of birth defects recorded since 2014 than that of similar counties in Texas. The area of Arlington has 400 natural gas wells alone and 52 drill sites, and the numbers are growing rapidly. In just a couple weeks, a French international company has applied to drill six more wells in a site not far from the elementary school. Arlington is covered in a maze of gas gathering and transmission pipelines and compressor stations and other drilling infrastructure, all carrying and releasing unodorized methane gas. In EPA Region 6 alone, almost 9 million people live within the threat radius of oil and gas development. Yet in the most recent SIP, our state agent environmental agency, the TCEQ, used 2014 rig data to evaluate a 2024 SIP plan. Please help us clean the air in Texas by imposing rules and fees such as these that will force our state agencies and this industry to come into compliance. The ALA has designated DFW as the 18th most polluted city in the nation. We ask the EPA to help us in Texas clean up our air. Thank you.
03:50:00	there is anyone else listed from Speaker Group 7 who hasn't spoken yet, please send us a chat message so that we can get you into the lineup. Thank you. I will now ask Natalie Pien to join us.
Natalie Pien	Hello. My name is Natalie Pien, and I live in Leesburg,
03:50:31 Melissa Weitz	Virginia. Can you hear me? Yes, thank you.
03:50:38	165, trialik you.
Natalie Pien	Thank you for this opportunity. I have the privilege of being
03:50:40	on the board of directors for both the Chesapeake Climate Action Network and the Piedmont Environmental Council. I am an active member of the Sierra Club, serving on the Great Falls Group executive committee. I am a retired public schoolteacher and a climate change activist. Today, I am acting on my most important role, that of grandmother. I have four granddaughters aged nine years, two years, six months, and just six weeks old. On their behalf and for all children, I

urge you to adopt the proposed methane emissions charge. essential to mitigating climate change and ensuring a livable world for all our children. As you know, methane is a shortlived but powerful greenhouse gas responsible for 25 percent of the climate change that has already happened. Because it has 80 times the warming power of carbon dioxide and its 20year atmospheric lifetime, reducing methane emissions is imperative to mitigating climate change. Recent studies reveal that the rates of both climate change and global methane pollution are accelerating. The window of time to act is closing faster than previously thought. The proposed charge is an urgent necessity. The charge is mandated by the Inflation Reduction Act and will hold the largest methane polluters, the oil and gas industry, accountable for their climate pollution. Advanced monitoring systems will identify polluters that violate federal standards, and they must then make payment. There are cost-effective and successful technologies that industry can choose from to meet federal standards. The proposed charge and resulting methane emissions reduction will have benefits not only for the planet but for people in many important ways. First, human health will improve. Methane pollution from oil and gas development is harmful, and other dangerous pollutants are simultaneously released, including smog-causing volatile organic compounds (VOCs) that worsen asthma, cardiovascular disease, and respiratory disease. Plus, toxic air pollution such as benzene, known to cause cancer, are released. According to recent studies, oil and gas production is responsible for \$77 billion in annual U.S. health damages, including thousands of early deaths and childhood asthma cases nationwide. Second, environmental justice will be addressed, as methane pollution disproportionately impacts people of color and low-income. The roughly 10.1 million living within half a mile of a fracking well are made up of Hispanic people, Black people, Asian people, and Native American people. Third, the proposed charge will create new, good paying jobs. If national methane standards were reinstated, 75 percent of related manufacturing companies and 88 percent of service firms report they will create more jobs. Clearly, the multiple benefits of methane emissions charges easily justify adoption of national standards. Furthermore, news that global warming surpassed 1.5 °C over the past 12 months for the first time on record is a huge red flag to do something. Please reinstate methane emission charges. Thank you.

Melissa Weitz 03:54:18

Thank you for your comments. If there aren't questions of the panelists, I will ask Linda Burchfeil to join us as our next speaker. Again, if any of the Speaker Group 7 folks listed here have arrived, please send us a message in the chat so we can find a spot for you. Linda, were you able to join us?

Linda Burchfeil 03:55:00	I'm not able to join now. Can I join later?
Melissa Weitz 03:55:04	Yes, yes.
Linda Burchfeil 03:55:05	Okay. Thank you.
Melissa Weitz 03:55:07	Okay. So next up, we will switch to Fletcher Sturm if Fletcher is available? All right, I see Fletcher online. You can un-mute whenever you are ready.
Fletcher Sturm 03:55:28	All right. I think I am un-muted and video working. All right. You hear me all right?
Melissa Weitz 03:55:36	Yes. Thank you.
Jameel Alsalam 03:55:37	Yes.
Fletcher Sturm 03:55:39	Okay. Thank you. Good afternoon, members of the EPA. My name is Fletcher Sturm. I am a consultant at my own firm working with energy and environmental commodity market stakeholders on the emissions transition. Prior to consulting, I dedicated my 30-year career to the natural gas industry, primarily on the trading side. I'm also author of a book, Trading Natural Gas, published by PennWell. I appreciate the opportunity to speak today and offer my comments on the Waste Emissions Charge. I'm in support of the Methane Emissions Reduction Program generally and as for the Waste Emissions Charge specifically, I'll begin by saying I am an advocate of incentive-based policy mechanisms from government that stimulate private sector innovation to solve problems like this. However, the current structure offers incentive to reduce emissions only below the proposed thresholds and no further. Also, it seeks to encourage swift action but only by raising the cost of the charge in years two and three. I believe a more effective structure that will immediately bend the curve or the average rate on methane emissions is a cap and invest type structure. One that offers incentive for continuous improvement to methane emissions performance beyond the proposed thresholds. Cap and invest programs, cap and trade is nothing new. There are many that have been in place for a long time and have been very successful at reducing greenhouse gas emissions. My proposal offers introduces a market mechanism called a methane emission reduction credit or MERC, an asset representing an environmental claim of one metric ton of methane emissions avoided relative to the proposed thresholds. MERCs would be granted to operators with methane emission intensities below the thresholds specified in each segment of the current rule, 0.2 for production, 0.05 for nonproduction operations, and 0.11 for transmission. For even stricter requirements to limit the supply of credits, MERCs could be made available only to those operators that

	I
	have intensities at half of the threshold levels or even lower. As the Administrator of this proposed cap and invest program, EPA would govern the registration and retirement of MERCs to comply with the Waste Emissions Charge. Operators with intensities above the threshold would incur MERC liabilities to be balanced from purchases of MERC assets at regular auction or directly from other market participants. EPA would offer MERCs for sale at \$900 a ton for methane in year one and scaling up according to the current proposed rule. However, operators with emission intensities below the specified limits that quality for MERCs could offer their credits at more competitive prices, selling them and effectively monetizing their superior performance. And therein lies the incentive to continuously improve emissions performance to bend the curve quicker and more than, in other words below, the proposed thresholds to decarbonize the petroleum and natural gas system. Proceeds from MERC sales could be invested in projects and grants toward improving methane mitigation as well as into environmental justice funds for disadvantaged communities. I hope you'll agree that this is a more comprehensive solution, and I thank you for the opportunity to offer this proposal to
	the Administration. Thank you.
Melissa Weitz 03:59:22	Thank you for your comments. Are there questions from the panelists? If not, I will ask if any of those listed from Speaker Group 7 that haven't spoken yet would like to speak. Please message us or press * nine so we can see you. We don't have anyone else lined up for this time slot, so we are going to stay available until 1:15 in case any of the listed speakers show up for the session. So we'll be doing that. If there is anyone who wants to speak earlier than their time slot, we will start accepting volunteers again when our next session starts after the break, and the break will go from 1:15 to 1:35 Eastern time.
Melissa Weitz 04:01:15	Okay. Thank you for joining for the morning sessions. My name is Melissa Weitz, and I have been chairing this hearing session. I want to thank everyone who has provided comments so far today on the proposed action. At this time, we're going to take a short recess. We will resume the hearing in 20 minutes, which is at 1:35 PM Eastern time. After the recess, the Hearing Chair and the panelists for the next session will introduce themselves, so thank you again.
Jameel Alsalam 04:01:51	Thank you to all the commenters.
Amy Hambrick 04:01:54	Thank you to all the commenters.
Pye Russell 04:02:02	Hi everyone. Welcome back from the lunch recess. My name is Pye Russell, and I am a special advisor in EPA's Office of Atmospheric Protection. This session of the Waste Emissions Charge for Petroleum and Natural Gas Systems Proposed

	Duta district multiple beaution from 11 19 ()
	Rule virtual public hearing. I would now like to ask our next group of EPA panelists to introduce themselves. We can start with Akshay.
Akshay Delity	My name is Akshay. I am an engineer with the EPA Office of
04:02:29	Atmospheric Protection.
Grace Weatherall	Hello. Am I just in time? I'm Grace Weatherall, attorney with
04:02:42	the Air and Radiation Law Office and attorney of this
	rulemaking.
Pye Russell 04:02:55	Thanks, Grace and Akshay. A quick reminder about providing testimony. When I call on you to speak, you'll receive an invitation to become a panelist on Zoom. You'll need to accept the panelist invitation when it pops up on your screen, and you'll then have the ability to unmute your line. While you are providing testimony, you are also welcome to activate your camera by clicking on the "start video" icon. If you are joining via phone, and I call your name, please press * nine to raise your digital hand and let us know that you are on here. You will then press * six to unmute and speak. If you are calling by phone, please state your name for the record. A four-minute timer will start when you state your name. If you are testifying by phone, the facilitator will alert you when you have one minute remaining in your testimony. To be fair to everybody, we are strictly enforcing the four-minute limit in testimony today. Now we'll go ahead and hear from the speakers from Groups 8 through 11. We'll have a short break after Speaker Group 11. At this time, we'll move to Speaker Group 8 starting with Soren Simonsen.
Kellie DuBay 04:04:06	Just a reminder, it takes just a second for folks to accept their
	invitation and get elevated.
Soren Simonson 04:04:23	Hello, my name is Soren Simonson. Can you hear me okay?
Kellie DuBay 04:04:31	We can hear you.
Soren Simonson 04:04:32	Okay, great. Thank you so much. As I said, my name is Soren Simonson. I'm here speaking today as a representative of the Mormon Environmental Stewardship Alliance, and I am very grateful to join you this morning for this public hearing. Thank you for that have made making it possible to weigh in on this important policy recommendation. The Mormon Environmental Stewardship Alliance is a faith-based, non-profit of many members of the Church of Jesus Christ of Latter-Day Saints, like myself, who are interested in how we make practical ways of caring for the Earth and each other, which is a foundation of our faith. We share the notion of many Abrahamic faiths including brothers and sisters in Christian, Jewish and Muslim faiths that we are called to replenish the Earth as part of our responsibility as human beings and a part of this great human family. In our church we are pleased with leadership we have received from our own leaders, our president, Russ M. Nelson, who said we

	should care for the Earth, be wise stewards of it and preserve it for future generations. So, I am addressing you today as part of this faith perspective. In Utah, the localized impacts of methane emissions are many sources from concentrated waste in our urban areas, areas where there is a lot of agriculture, particularly dairy agriculture, and particularly Eastern Utah and Central Utah, coming from oil and gas production. This is what I want to speak to you today. We have the challenge of unique geography that in the winter time, like we are experiencing right now, we get periods where thick blankets of cold air accumulate pollution in the valleys where most of our population resides. That's the case here in the Salt Lake metro area where I live and work, as well as the Uinta basin in Eastern Utah where a lot of gas and oil industries are producing large amounts of methane related to oil and gas extraction. We applaud the efforts of the Biden administration and particularly the Environmental Protection Agency and so many working on this issue to create a comprehensive set of policies looking at localized impacts of methane and broad impacts that are contributing to the climate crisis we face today. In the Uinta basin, these public health risks are very real. These inversions in the wintertime and in the summertime are producing high concentrations of methane that contributes to pollution and other air quality challenges that are having very real impacts on individuals that live in and around the areas of large oil and gas production. And so we are pleased with a package of rules and responses to this coming currently from the EPA with a rule that was adopted just a few months ago. And this added methane emissions charge that will help provide, I think, a greater nudge for those that may not have the interest on their own to comply or to move forward. I just want to note that Utah has among the highest methane concentrations from oil and gas production in the United States. Meaning, in many times in the wintert
Pye Russell 04:08:33	Thank you for your comments. Unless there are any clarifying questions from the EPA panelists, we'll move onto our next speaker, which is Bruce Krawisz.
Bruce Krawisz 04:08:55	Hello, are you able to hear me okay?

Pye Russell	Yes, thank you.
04:09:00	
04:09:00 Bruce Krawisz 04:09:03	My name is Bruce Krawisz. I am a physician who specializes in pathology, who studies the health effects of climate change and air pollution at Marshfield Clinic Research Institute in Wisconsin. 2023 and 2016 are the hottest years ever recorded but our children may remember them as cool. Every year for the rest of our lives will be one of the hottest on record. Rapid global heating compromises everybody's health, particularly the health of children and future generations. Human activities subvert Earth's climate by adding the greenhouse gases carbon dioxide, methane and nitrous oxide to the atmosphere. These greenhouse gas emissions are the cause of global heating. Global heating causes heat waves and heatstroke, droughts, wildfires, declines in agricultural and seafood harvests, flooding due to both heavy rainfall and sea level rise, more cases of infectious diseases caused by mosquitos and ticks, and water and food contamination. There is a solution. Emission of heat-trapping gases can be reduced to re-stabilize Earth's climate. Reducing methane benefits everyone. I am asking the EPA to make every effort to reduce methane emissions by the Petrochemical industry. Oil and gas infrastructure is the largest industrial source of methane. Methane emissions are an important cause of global heating and are a threat to human health. During gas extraction, transportation and use, methane enters the atmosphere. Methane is more effective at retaining heat in the atmosphere than carbon dioxide and is responsible for about 15 to 20 percent of global heating today. The goal of the Paris agreement, limiting global warming to no more than two degrees Celsius, may be humanity's most important public health goal. The following is a quotation from the Lancet Commission on Climate Change: "With the world currently heading toward three degrees Celsius of heating, any further delays in [climate change
Dvo Puscoll	action will increasingly] threaten the health and survival of billions of people alive today." Thank you. Thank you for your comments. If there are no clarifying
Pye Russell 04:12:12	questions, I believe the next several people listed have already provided testimony so we are going to move down to James Turner, if you are ready please.
Kellie DuBay 04:12:56	James, are you able to un-mute yourself?
James Turner 04:13:01	I had not seen those buttons earlier.
Kellie DuBay 4:13:03	Oh, that's okay. Welcome.
James Turner 04:13:05	Thank you. I'm James R. Turner, residing the Kansas City, Missouri. In a previous decade, I have made car trips and led bus trips to the east coast to call for government policies on

decisions that reduce fossil fuel's damage to our climate. I have also acted personally by putting solar planets on my roof and by driving a Nissan Leaf, and I am now planning to install a heat pump in my house this year. My city is actively engaged with solar panels on municipal buildings and plans for a solar farm adjacent to our airport. I am here today to voice my support for the proposed rule for Waste Emissions Charge for petroleum and natural gas systems. Climate change is heading to unpredictable catastrophic weather events. If humanity fails to slow the rise of temperatures, even the ordinary processes of our ecosystems and human civilization will be widely disrupted, increasing temperatures are having adverse effects on crop yields, exacerbating food insecurity with more political instability worldwide. Methane is the second biggest contributor to global warming. Reducing methane pollution from the oil and gas industry is the fastest, most cost-effective way to slow the rate of climate change. The Waste Emissions Charge is a commonsense thing that will hold the nation's largest oil and gas polluters accountable for excessive climate pollution. If companies abide by common sense methane standards that cut waste and pollution, they won't pay a fee. The Greenhouse Gas Reporting Program will provide a sound basis for the fee. There are a variety of cost-effective and successful technologies that can help operators avoid the fee. Operators are already implementing many of these technologies such as advanced monitoring techniques and zero-emitting process controllers. Reducing methane pollution in the oil and gas sector will provide many technical and innovative jobs that pay well. The overall economy will benefit if the harms from methane pollution are reduced. Methane pollution from oil and gas development is accompanied by other dangerous pollutants such as smog-causing volatile compounds, which can worsen asthma, cardiovascular disease, and respiratory disease, as well as toxic air pollutants such as benzene, which is known to cause cancer. These harms disproportionately impact communities of color as well as low-income communities and the elderly in Appalachia. Environmental justice will be improved when the amount of these pollutants is reduced. Many practices in agriculture, manufacturing, construction, and transportation must also be improved if we are to slow the increase of climate warming. As a citizen, I am applying my time and advocacy for those issues as well, but we must achieve improvements on all fronts. And we cannot be safe without the improvements that the Waste Emissions Charge for petroleum and natural gas systems can bring. That concludes my remarks.

Pye Russell 04:16:46

Thank you for your comments. If there are no clarifying questions, we are actually going to go up to Annika Barron. If you are ready?

Annika Barron 04:17:17

Hello. One moment. My name's Annika Barron, and I'm here as a college fellow with the Young Evangelicals for Climate Action, a proud resident of the Chicago area, a student at the University of Notre Dame, and a future physician. Thank you for acting swiftly to propose a rule to cut out methane and other harmful pollutants from new and existing oil and gas operations. As an Evangelical Christian and student at a catholic university. I am committed to the common good and loving my neighbors. I strongly support the Environmental Protection Agency's proposed Waste Emissions Charge. As a neuroscience and premedical student at Notre Dame. I have learned about the beautiful intricacies of the human body and nervous system, but I have also learned the ways these systems are fragile and can be impacted by the environment. Methane and other waste emissions from burning carbonbased fuels cause a form of cellular damage called oxidative stress. The cumulative damage of oxidative stress over a lifetime is a leading culprit of the development of neurodegenerative disorders factors as well as a contributing factor to neuro-developmental disorders when pregnant women or young children are exposed. Medical research shows that exposure to methane is associated with congenital heart defects, a 25 percent increase in children's asthma 86 times the exposure to cancer-causing chemicals. and an increase in low birth weight which can lead to a lifetime of health complications. Furthermore, methane is the second largest contributor to the human produced warming we experience today. Meaning, it will only continue to exacerbate the negative effects of the climate crisis on the physical, mental, social, and emotional health of all the world's citizens. From learning about the impacts of chemical factors on neurobiological systems in the classroom to working in Rome during its hottest summer on record, to meeting individuals impacted by climate change from all the over the world from COP 27 in Egypt, to hearing from friends in the medical field about the dangers of pollution, it has become clear to me that the climate crisis is a health crisis. It is my commitment to faith and justice, which has led me to pursue a career as a physician, and in order to promote abundant life for all. These same values are why I believe it is essential to take action to prevent further warming and toxic effects. Both as a way to protect health and a moral responsibility to care for those around us. To ensure that the EPA's implementation of the fee fulfills Congress's goals, the final regulation must continue to include key requirements including regulatory compliance exemptions must only become available after final standards and plans are in effect in all states and these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for exemption must also demonstrate full compliance across their facilities. Strong and clear criteria must remain in place

	for operators seeking exemptions based on unreasonable permitting delays. Additionally, when operators seek an exemption for plugged wells, they must clearly demonstrate that their wells have been properly plugged and are no longer polluting. Transparent calculations and methodologies must be used to accurately determine an owner or operator's net emissions. And finally, strong verification protocols must be put in place so that fee obligations accurately reflect reported emissions and that exemptions are only available while conditions Congress set forth are met. Our children and families deserve clean air. I am grateful to the EPA for recognizing this urgent health need with it's Waste Emissions Charge. I urge the EPA to quickly finalized this proposal with limited flaring, strengthened emissions standards for storage tanks, and a pathway for enhanced community monitoring to ensure all people can breathe clean air. Thank you for your work on this important matter.
Pye Russell	Thank you for your comments. If there are no clarifying
04:21:09	questions from EPA panelists, we'll ask if Patricia Bond is online or if she's calling by phone, if you could please hit * nine to raise your hand. We would also like to remind all the speakers to speak slowly for our Spanish interpreters. Thank you.
Kellie DuBay	I have not seen a hand go up.
04:21:45	
Pye Russell 04:21:47	Okay. Thank you. So we'll go down to Matt Rota. If you are there, you will be up next. Thanks.
Matt Rota 04:22:19	All right, y'all hear me? Great. Hey, my name is Matt Rota, and I am the senior policy director for Healthy Gulf. My address is 935 Gravier Suite 700 in New Orleans, Louisiana. Our purpose is to collaborate with and serve communities by providing research, communications and coalition-building tools needed to reverse the long pattern of overexploitation of the Gulf's natural resources. The proposed rule is a good addition to the pollution reductions that we will see and will be necessary to keep our planet livable. I am here to speak in support of the Waste Emissions Charge for Petroleum and Natural Gas Systems Proposed Rule. The Gulf of Mexico coastal communities are at ground zero for the impacts of climate change in the United States. Reducing methane pollution from the oil and gas industry is the fastest and most cost-effective way to slow down the rate of climate change happening now and avoid the further escalation of strange and severe weather such as wildfires, floods, as well as increasing and more intense tropical storms and hurricanes that we experience down here. Methane pollution from oil and gas development is released alongside other dangerous pollutants such as smog-causing volatile organic compounds (VOCs) which can worsen asthma, cardiovascular disease, and respiratory disease as well as toxic air pollutants such as

	benzene, which is known to cause cancer. In fact, one study in 2019 found that those living within 500 feet of an oil and gas well site are at an increased risk of cancer and those within 2,000 feet are at risk of adverse health impacts. And it is very important to note that oil and gas pollution disproportionately impacts communities of color, many of which reside in the coastal Gulf of Mexico area. The Methane Emissions Reduction Program's The Waste Emissions Charge, which is mandated by Congress and the IRA, is a common-sense fee that will help begin to hold the nation's largest oil and gas polluters accountable for excessive climate pollution. There are a variety of cost-effective and successful technologies that can help operators avoid the fee if they want to. Operators are already implementing many of these technologies throughout the field such as advanced monitoring techniques and zero-emitting process controllers. It is vital, as the previous speakers spoke, for any exemptions to be carefully monitored and handed out in very few circumstances if we want this program to be effective. It seems like a commonsense program here where operators that reduce leaks to avoid the charge, they will waste less money, strengthen our energy security, and create jobs. The Methane Emissions Reduction Program also includes over a billion dollars in funding to reduce methane in states, tribal agencies, communities, and operators. If our EPA and the DOE have already announced the commitment of \$350 million in funding to 14 states to help mitigate methane emissions for the end-of- life wells. Here at ground zero for climate change, we are seeing sea levels rise and we are losing our wetlands. It is very important that we reduce this pollution as quickly as possible. Reducing methane in this manner isn't the silver bullet, but it is an important step. In summary we encourage the EPA to monitor this and reduce the amount of exceptions to as close to zero as possible. In the end we do support this Methane Emissions Reduction
Pye Russell 04:26:13	Thank you for your comments. If there are no clarifying questions, I'll now go back to call on any speakers who were not here when their name was originally called. Patricia Bond, if you are online or calling my phone, please hit * nine to raise your hand.
Pye Russell 04:26:36	If none of the original Group 8 speakers are on, we still have time in this session to take comments from other speakers who have indicated they would like to speak. If you are interested in registering to speak, please send an e-mail to meetings@erg.com or send a message to an attendee support in the chat. If you are joining via phone and would like to now provide testimony, you can raise your hand by pressing * nine. Looks like we have one person that we can add to the group. Linda Birchfiel, if you are there, you are up next can go next please.

Linda Birchfiel	Can you hear me?
Pye Russell	Yes.
04:27:34	Ves. Okay. Thank you for this opportunity to speak. My name is Linda Birchfiel and I am a concerned citizen from New Mexico. I am in strong support of this proposed regulation for this to implement the Waste Emissions Charge. Methane reduction is critically important and we need to start right now. Methane makes up 25 percent of our greenhouse gas [inaudible] and because it is so potent but also short-lived, limiting it is the best way to provide some temporary relief from the disaster of climate change. If we act now to reduce methane, we can buy time to cut other greenhouse gases such as carbon dioxide. Compliance with this regulation will be made easier thanks to financial assistance and revisions to Subpart W as well as recent technological advances that have reduced cost and sparked a methane mitigation industry. With the expertise in this industry, leaks can now be more easily detected and repaired, and routine flaring can be curtailed. In fact, some operators have seen their writing on the wall and have already acted to reduce emissions. Operators who have not been so proactive will need to the charge to incentivize them. The regulation has been designed to be effective, but also fair. It only applies to a subset of a facility's emissions that exceed the levels set by Congress. It allows for netting and calculating emissions and it provides several exemptions. Most importantly, it applies only to large emitters, and even those operators won't have to pay a fee if they follow common-sense methane standards. Not only is methane reduction of vital importance for our climate, it also benefits our economy by creating jobs that are well paying and labor intensive. Already, before the regulation has been implemented, there are over 225 manufacturing and service companies in the methane mitigation industry with nearly a thousand employee locations across the country. This industry has nearly doubled in size since 2017 and will continue to grow. 75 percent of manufacturing firms and almost 90 percent of service
	alliance found over ten thousand net direct and indirect jobs will be created annually, and manufacturing, construction, operations and maintenance positions nationwide through 2035 to support efforts to reduce methane emissions. This
	charge is well-designed to cut methane emissions in a fair
	manner, and I urge its implementation. Thank you.
Pye Russell 04:31:13	Thank you for your comments. If there are no clarifying questions, we'll move onto the next commenter, who is Lauri
	Castello.

Lauri Castello 04:31:45

Hi. My name is Lauri Castello. I am a family physician and speaking in favor of Waste Emissions Charge as strong as possible to help limit the reckless wasting of methane by oil and gas operators. I appreciate the EPA and testified before you in July of 2017 when the past administration forced a stay on the methane Rule. 116 members of the public from around the country testified against this stay while only two speakers were for it. Nonetheless, this stay was enacted. We presented the science behind the harmful effects of methane leaks, venting, and flaring on human health and the environment much as you are hearing today. We presented the science behind the harmful effects of methane leaks, venting, and flaring on climate change, which has its own health and public health consequences. You are hearing this again today as well. We presented the moral arguments for protecting vulnerable and disenfranchised populations from an industry that targets them for profit, which you are hearing again today. There were personal accounts of harms suffered at the hands of the oil and gas operations, which you are hearing again today. We presented data on the availability of proven technology and of high-paying jobs in methane mitigation, which you are hearing again today. That was 2017. I was living in Colorado where we later passed legislation that forced the state's oil and gas commission to enact emission change. A change from promoting the oil and gas industry to regulating it. During rule making for that mission change I was amazed at the continued denial of science by industry advocates and by their complete dismissal of public health priorities. I had the opportunity to visit orphaned wells on public land in a heavily fracked area around Grand Junction Colorado where endocrine disrupters have been found in surface water. And I was horrified by the lack of industry's respect for the rules regarding well capping and site cleanup. The bond that operators were required to post is orders of magnitude less than the cost of clean-up. which is often not even attempted. I find it disturbing that MERP provides funds for methane mitigation to an industry that has long denied the damage it causes and has ignored mandates for cleanup while using low-cost drilling permits on public lands as a ticket to continue causing harm. I support the strongest possible Waste Emissions Charge as an important part of the solution. You heard this morning about the "Natural Gas Sustainability Coalition". The only thing about fracked gas that is sustainable is the damage it causes to the health of humans, wildlife, plants and to the environment that used to sustain us. During the height of the pandemic, when it was clear that fracking air pollution significantly increased susceptibility to COVID, oil and gas industry revenue was spiraling downward due to lack of demand for fuel. They requested and received permission from the governor of Colorado to continue their operations,

Pye Russell	allegedly to avoid bankruptcy. I currently live in New Mexico, the sacrifice zone, where I previously participated in BLM hearings that were packed by industry workers during the work day to testify that fracking operations provided a living for their families and to brag about the safety of the well pads, where some like to ride bikes with their kids. Humans have been experiencing, documenting and reporting severe adverse effects from oil and gas operations for decades. The current emergency demands that the EPA swiftly hold industry accountable despite their continued prioritization of profits over people and over our Earth. Thank you. Thank you for your comments. If there are no clarifying
04:36:04	questions, we will now go to Catherine Wolfram.
Catherine Wolfram 04:36:38	Great. Can you hear me?
Pye Russell 04:36:41	Yes.
Catherine Wolfram 04:36:42	Okay. Perfect. Good afternoon. My name is Catherine Wolfram and I am a professor of energy economics at the Massachusetts Institute of Technology. I have been studying the subject of Environmental Economics for over 20 years and I have done work on topics that provide important insights relevant to the RACT rule being developed by EPA. I have previously served as the Deputy Assistant Secretary for Climate and Energy Economics at the United States Department of Treasury from 2021 to 2022, and I support the implementation of a Waste Emissions Charge on methane such as the one described in the Inflation Reduction Act. I have three points. First, the Waste Emissions Charge should remain in effect indefinitely and should not be described as a bridge to full implementation of the Clean Air Act of section 111 rules. The WEC should be characterized as being indefinitely applicable to any and all Subpart W facilities. A facility's eligibility for the WEC, at any point should not be interpreted as an elimination of the WEC and it's methane emissions thresholds. Clearly, characterizing the WEC as an indefinite fee that exists independently of the section 111 rules provides the benefit of regulatory certainty that is so important to the private sector and also to our international trading partners. For example, the proposed rule states that if any Clean Air Act Amendment section 111(b) or (d) facilities contained a WEC applicable facility in the respective reporting year or not in compliance with the emission requirements, the regulatory exemption would not apply for that reporting year so the final rule should emphasize that without the regulatory exemption, facilities are subject to the Waste Emission Charge. Second, regards to the EPA, the proposal that a facility would not be eligible for the compliance exemption if any section 111(b) or(d) facility that is contained within the WEC applicable facility has one or

	more deviations or violations of any methane emission
	more deviations or violations of any methane emission requirements under the applicable rules, I support this proposed treatments of the applicable facilities. Finally, the regulatory compliance exception to the WEC should not be granted to any facility until after all states have fully implemented section 111 standards and plans. Again, I support the EPA's proposed interpretation of all states in the Clean Air Act to mean that every state with an act applicable facility must have an approved plan before the determination can be made. This interpretation will likely yield greater methane emission reductions than making determinations on a state-by-state basis and it will be simpler to implement. I disagree however with EPA's interpretation that the standards and plans are "in effect" when all states and federal plans are approved. Instead, I recommend that the EPA interpret the Congressional directive in effect to mean that all compliance states in the NSPS and state and federal plans have passed. The proposed approach of exemption availability once the plans are approved, instead of after the plans are fully implemented only delays the reduction of methane emissions and can even serve to incentivize states to develop plans that delay the compliance requirements for as long as possible and still be approved by the EPA. Therefore, granting any regulatory compliance exemption before full implementation of the section 111 rules as EPA is proposing to do is in contradiction with the Congressional intent of the Inflation Reduction Act and will result in greater methane emissions than the alternative and should be
	avoided. I thank you for the opportunity to provide comments and if you have any questions or need any additional
	information, feel free to contact me.
Pye Russell 04:40:28	Thank you for your comments. If there are no clarifying questions, we're now going to move to Speaker Group 9 please. Hannah Miller is the first speaker in Group 9.
Hannah Miller 04:41:17	Hello, can you hear me?
Pye Russell 04:41:20	Yes.
Hannah Miller 04:41:21	Okay, good. My name is Hannah Miller. I live in Philadelphia. This is an environmental justice story. I live in Philadelphia now, but until I was seven, I lived in an area of active oil and gas production. Namely, Arlington, one of the prior panelists talked about Arlington, Texas. It is one of the most polluted areas in the country. I didn't know that growing up. When I was four, I was hospitalized for such a bad case of pneumonia that I almost died in a tiny oxygen tent. Many of my other friends from daycare and elementary school had similar respiratory problems. We got sick all the time and none of us knew why. With oil and gas production actively in the area, with this kind of pollution, with this kind of

	environmental injustice, it takes years to figure it out. You just
	environmental injustice, it takes years to figure it out. You just wonder, "why is my respiratory system is so compromised?" To this day, once a year or once every two years, I get an infection from long-term respiratory damage. I cough and hack so much without stopping for three weeks at a time. I am unable to work. I can't sleep in the same room as my partner. I cough so much I almost vomit. I have seen doctors over the years many, many times and they have just told me, "there's nothing I can do about this." This has happened every year for 40 years. This will be with me for the rest of my life. There are ten million people living in such areas now. If you swiftly implemented these rules as quickly as possible, you could do ten million people a great benefit that would last their whole lives. They are not here in this room today, but I hope you are thinking of them. I also have friends and family who worked in oil and gas. Many of them have said to me that they wish the government would require better regulation of the industry that they work in. I had one friend who worked in oil and gas who moved from Texas to Colorado because it was better regulated and he did not want to endanger his health. This friend didn't want his own health jeopardized and he didn't like that the industry he worked in hurt the Earth and
	his fellow workers.
Hannah Miller 04:43:25	He actually attends environmental meetings after his shifts. He hopes some day oil and gas production can be carbon neutral. This is possible but it won't happen until we control methane. This program is funded. It is ready to go and it is time to do it and it is important to do it fast and as quickly as possible. Imagine that it is your friend working at a refinery. Or imagine that it is your child in an oxygen tent. How quickly would you act then? You would act very quickly. Please do something now. Thank you.
4:44:00	Thank you for your comments. If there are no clarifying questions, we will go to Scott Eustis, who we do not see in the chat. Scott, if you are calling in, please hit * nine to raise your hand.
Kellie DuBay 04:44:25	I am not seeing a hand go up at the moment, Pye.
Pye Russell 04:44:29	Okay. We will move to Patrick Grenter and similarly, if you are calling in please hit * nine to raise your hand so that we can see you.
Kellie DuBay 04:44:46	Not seeing a hand go up.
Pye Russell 04:44:50	All right. We'll move to Craig Nazor. And if you are calling in, please again hit * nine to raise your hand.
Kellie DuBay 04:45:09	No hand.
Pye Russell 04:45:10	All right. We will next move down to Cyrus Reed. Cyrus, please.
Cyrus Reed	Can you guys hear me?

04:45:37	
Pye Russell 04:45:40	Yes. Thank you.
O4:45:40 Cyrus Reed 04:45:42	Yes. Good afternoon. My name is Cyrus Reed. I reside in Austin, Texas and I am the Legislative and Conservation Leader of the Lonestar Chapter, that is the Texas chapter of the Sierra Club. We very much support EPA's overall efforts to reduce methane emissions and specifically the creation of a Waste Emissions Charge for the oil and gas industry as required by law. As the person whose job it is to interact often on a daily basis with the Texas legislature, state agencies, and many local governmental entities, we understand here in Texas we require federal legislation, federal funding, and regulation to get the methane issue under control. Without federal action, our state has failed and will continue to fail to make real progress on reducing methane emissions. No state produces more methane than Texas. It creates a lot of jobs, it creates a lot of revenue, but also no state emits more methane than Texas from our oil and gas sector. A recent study of fly over oil and gas production and methane emissions over the Permian Basin found that the levels of emissions were about twice as high as in New Mexico. We know that New Mexico has active state-level methane controls, and yet our political leadership continues to fight common sense regulation that many frankly in the industry already support. Now more than ever we need methane controls but also, this Waste Emission Charge to be implemented in a timely fashion. We see methane emissions charge as one leg of a three-legged stool. We have the new methane emissions regulation, which were approved back in December. We have the Methane Emission Reduction Plan and the grants, that's more of a carrot. We have this waste emission charge, which is more of a stick. We really need all three legs of the stool to make real progress on cutting emissions of methane. You guys know this. Methane is a short-lived climate pollutant that is about 80 times more potent than carbon dioxide within a 20-year period. It is the second biggest contributor to global warming and is responsible f
	this but I think you do, El Paso, Dallas, Fort Worth, San Antonio, Houston, now even the Austin area do not meet the federal ozone standards. Cutting VOCs along with methane will help millions of Texans in those cities and areas. As we confront this dual public health and environmental threat that
	is the climate crisis, reducing methane pollution is the fastest and most cost-effective way to slow our current rate of global

	,
	warming. So we are thankful for all the recent actions by EPA, Biden administration, DOI. The DOI recently made available millions of dollars for the plugging of orphaned wells. Railroad Commission of Texas got that money and they are already plugging wells with it. EPA made a conditional announcement that \$130 million will go to TCEQ for a new plugging program for low producing wells. This is essentially a carrot for the industry because we know a lot of these wells are likely to invest in new pollution control equipment. So that is a way for them to go ahead and to shut up the wells that aren't productive any way. We know that research has shown that low producing wells are among the highest methane emitters. You made a number of additional announcements about more competitive grants. Really appreciate that. We, of course, have the finalization of the new methane rule in December of '23. The safeguards in that rule are a major win for the climate and public health, with the state of Texas driving
Pye Russell	Thank you. Sorry to interrupt. Thank you for your comments.
04:49:45	We have reached the 4-minute limit.
Cyrus Reed	I'm sorry. Can I make one final point?
04:49:51	, i
Pye Russell	We encourage you we are keeping it to four minutes. We
04:49:55	encourage you to submit any comments to the written docket.
	Thank you.
Cyrus Reed 04:50:02	Will do. Thank you so much.
Pye Russell 04:50:05	We are now going to go to Molly Rooke, please.
Molly Rooke 04:50:15	Can you hear me?
Pye Russell 04:50:18	Yes.
Molly Rooke 04:50:19	Okay. Good afternoon. I'm Molly Rooke and I live in Texas, part-time in Dallas and part-time in rural Refugio county in south Texas. I am grateful for this opportunity to provide comments today on the proposed Methane Emissions Reduction Program and waste emissions fees. I strongly support the proposed rules as the fastest, most cost-effective way to immediately slow our current rate of global warming by focusing on the oil and gas companies, which are the largest industrial sources of methane. I also have personal reasons for supporting these proposed rules. Living in Texas, a state which does very little to protect public health in the environment unless forced to do so by the federal government, we really need the EPA's help to reduce greenhouse gases and air pollution, both of which are unacceptably high here. I have asthma and live in areas with oil and gas activities and dirty air. Also, my family's farm, which has been in operation for around 188 years, has

	suffered from increasing harms of extreme weather events, worsened by the climate crisis, including more prolonged droughts, hurricanes and floods, making farming increasingly risky and very difficult. EPA's proposal is likely to be highly successful by incentivizing companies to take action quickly to reduce methane emissions by imposing fees. I have read that there are smart, forward-thinking companies already retrofitting their well-sites using zero-emission equipment, not only saving them from paying the fees, but also reducing the waste of products that they can sell to generate more profits. It is critical that states, including Texas, receive federal money to help reduce methane emissions. I'm really glad the Methane Emissions Reduction Program includes over a million dollars in funding to reduce methane emissions for states, tribal agencies, communities and operators. And that the EPA and Department of Energy have committed \$350 million so far to help 14 states mitigate their climate emissions from end-of-life wells. This especially resonates with me. My family struggled with abandoned wells rusting and leaking old oil and gas infrastructure on our land without help from our state regulators until forced to sue them to get results after one of our wells had a blow-out spewing methane and other pollutants into the air. It's also important to ensure that the rules require sufficient transparency on monitoring. I plan to give more written comments but right now, thank you for your time and attention to this critical matter in which our lives, livelihoods and future depend. Thank you.
Pye Russell 04:53:40	Thank you for your comments. Thank you. If there are no clarifying questions, we have some additional time in this Speaker Group. So we can we have some volunteers that are already lined up to be included in this group. Before we go to them, I wanted to double-check that none of the people in this group that did not jump on when we original called them, if they are on and would like to give their testimony now, again, if you are calling in by phone, please hit * nine to raise your hand.
Kellie DuBay 04:54:24	I'm not seeing a hand go up, Pye.
Pye Russell 04:54:28	All right. Thank you. Also again, if you are scheduled to provide comments at a later group but you would like to do it early, please send a message via the chat or if you are calling in, you can hit * nine to raise your hand so we can see you. The next person up that has been added to this group is Walter Gerstle.
Kellie DuBay 04:55:18	Walter, are you able to un-mute?
Kellie DuBay 04:55:44	I don't know if he has been given panelist status. Walter, if you can hear me, you are going to have to accept the invitation if you are given one. We can come back to Walter.

	If you want to move on to our next volunteer, Pye We can give Walter a hand behind the scenes.
Pye Russell	Great. We'll go to James McCarthy, if you are ready, please.
04:54:20	
James McCarthy 04:56:42	Can you hear me?
	Yes.
1	
	Yes. Good afternoon. I am Jim McCarthy from Innovative Environmental Solutions. I am speaking today on behalf of INGAA, the Interstate Natural Gas Association of America. INGAA is a trade association comprised of 26 member companies representing the vast majority of the interstate natural gas transmission pipeline companies in the U.S. and Canada. INGAA's members transport more than 95 percent of the nation's natural gas through about 200,000 miles of interstate natural gas pipelines. In 46 of the 48 contiguous United States, INGAA members operate more than 1,300 compressor stations and storage facilities along those pipelines, which are used to transport gas to local distribution companies, industrial markets and gas-fired electric generators. INGAA's primary comments regarding the WEC rule proposal include the following: INGAA supports the definition of WEC applicable facilities that relies on CO ₂ equivalent emissions reported under Subpart W of the GHG Reporting Program. This is consistent with the legislative directive of IRA. As discussed in the impact analysis released with the proposal, this will exclude some facilities that report under part 98 from the part 99 WEC regulation. Netting is an important provision of the rule and the proposed rule relies on the part 98 definition of owner-operator to define the company basis for netting emissions across multiple facilities. But EPA has requested comment on whenever the parent company. The IRA clearly indicates that netting should account for facilities across all applicable segments, and we note that the parent company is reported under part 98. If you look at information from that program, it shows that part 98 owners-operators are often subsidiaries of a parent. For example, operations within common ownership that report under the gathering and boosting segment and transmission segment typically have different subsidiary-based owners and operators that differentiate those segments. Thus, we think the proposed approach establishes boundaries between seg
	which provides for netting across segments. Again, on that point to reiterate, netting should occur at the parent company
	level. INGAA recommends a regulatory compliance exemption be applied on a state-by-state basis rather than

	the proposed approach that requires all state programs be in place. For SIP implementation, history shows that approvals can be fraught with delays due to legal issues. Thus, a complete slate with all approved plans is unlikely to occur for many years. If all the plans are approved then in effect, the exemption would be eliminated by a single SIP being challenged and disapproved. We believe requiring nationwide rather than state-by-state approval could essentially make this exemption a meaningless aspect of the WEC program, which would undermine Congress's goal of providing facilities relief if they are complying with the Clean Air Act section 111(b) or 111(d) standards. Finally, INGAA's notes that there are minor errors and inconsistencies that require remedy. One example is the equation for transmission facilities inconsistently defines the methane intensity threshold, and the 0.11 percent threshold should be consistently applied in both the equation and the related parameter definitions. INGAA's comments will identify such typos and inconsistencies. With the proposal
Pye Russell 05:00:51	I'm sorry. That is the end of the four minutes. We appreciate your comments and again we encourage you to submit any additional comments via the docket of written comments. Thank you again.
James McCarthy 05:01:04	Thank you.
Pye Russell 05:01:09	We still have time for this Speaker Group for some additional folks who have volunteered to go early Walter, if you are there, you should receive an invite to be promoted to a panelist. You are up next.
Kellie DuBay 05:01:51	Alright. He has been promoted as a panelist. Walter, are you able to un-mute?
Walter Gerstle 05:01:57	Yes, I'm here.
Kellie DuBay 05:01:58	Thank you.
Walter Gerstle 05:02:02	Shall I start?
Pye Russell 05:02:05	Yes, please go ahead.
Walter Gerstle 5:052:06	Okay. My name is Walter Gerstle. I am a retired professor of civil engineering and a registered professional engineer in New Mexico and Colorado. I thank the EPA for holding public hearings on Waste Emissions Charge for Petroleum and Natural Gas Systems. Methane is the second biggest contributor to global warming, following carbon dioxide and it is responsible for more than 25 percent of the climate change we are already experiencing today. Globally, methane pollution is growing at historic rates and methane is currently at an all-time high. A surge since the start of this century has led to the highest concentration of atmospheric methane

	since the National Oceanic and Atmospheric Administration first started measuring it in 1984 and last year saw the largest year over year increase on record. As a professional engineer it is my duty to protect the health, safety and welfare of the public. Methane emissions are inconsistent with protecting public health, safety and welfare. And here, I'm thinking not only of the current public but the public in 20, 30, a hundred years from now. We know that we must stop emitting greenhouse gases. The science is clear. The health, welfare and safety of the public, both of current and future generations, is in our hands. Responsible leadership must guide us to a less expensive, healthier and environmentally sound energy future. Reducing methane pollution from the oil and gas industry is the fastest and most cost-effective way to slow the rate of global change happening now and to avoid further escalation of strange and severe weather such as wildfires and floods. Please implement the strictest possible Waste Emissions Charge for petroleum and natural gas systems. Thank you.
Pye Russell 05:04:29	Thank you for your comments. If there are no clarifying questions, another person added to this group is Susan Bonney. Susan, you should be promoted, and you are up next.
Susan Bonney 05:04:55	Hello. I am Susan Bonney. I am the chair in the state of Virginia, of the Sierra Club's local group, the Great Falls group, for the Virginia Chapter of the Sierra Club. I am in Fairfax county, Virginia. And I am grateful for the opportunity to provide comments to support the proposed rules. I grew up near the Norfolk naval shipyard in Virginia. My father worked nearby. So personally I feel a connection here. Portsmouth, Virginia's naval hospital is where I got my health care and my family and all our neighbors. In Portsmouth, Virginia, pediatric asthma rates are five to six times higher than the region's rates and communities nearby the Norfolk naval shipyard where my father worked near there. In Virginia, many marginalized communities are disproportionately experiencing very poor health outcomes because of environmental pollution. Reducing methane pollution from the oil and gas industry is the fastest, most cost-effective way to slow the rate of climate change happening now and avoid the further escalation of severe weather bringing us wildfires and floods. Methane pollution from oil and gas development is released alongside other dangerous pollutants such as smog causing VOCs, volatile organic compounds, which can worsen asthma, cardiovascular disease and respiratory disease. As well as toxic air pollutants such as benzene, which is known to cause cancer. South of east of where I live is Petersburg, Virginia. It is among one of the communities in the 82 percentile for air toxics released, per EPA's EJ screen. Methane leaks are a community issue in the communities I have described. In today's political climate, providing jobs is

	so often the justification for legislation and programs. So, an analysis by BlueGreen Alliance found, 10,000 net direct and indirect jobs created annually in manufacturing, construction, operations, maintenance positions throughout the U.S. will support the efforts to reduce methane emissions in the oil and gas sector through 2035. In conclusion, I support this proposal and so does the Sierra Club. This proposal will ensure that the reported emissions that form the basis of the fee are accurately reflecting emissions by incorporating real world data. The proposed provisions also will work together to safeguard our climate, public health, and create good paying jobs. Thank you for your time.
Pye Russell 05:07:55	Thank you for your comments. If there are no clarifying questions from the EPA panelists, we are running a little bit ahead of schedule. We have some folks on the line from Speaker Group 10. So we are going to move to Speaker Group 10. We have already heard from a number of the people speaking for Speaker Group 10, so we'll also likely have some additional room for anyone who is not registered to testify but would like to, or people who are testifying later in the day, if they would like to be moved up to Speaker Group 10, we'll probably have time again in this time slot to add some additional people. But going first on this list again some people have already spoken so we are going to be starting with Carolyn Heckman, please
Carolyn Heckman 05:09:07	Hello. My name is Carolyn Heckman. I am the Pennsylvania Policy and Outreach Coordinator with the Evangelical Environmental Network. I live in Louistown, Pennsylvania with my husband and our five-year old son. Thank you for acting swiftly to propose a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. As an Evangelical Christian committed to defending light and commanded by Jesus to love my neighbor as myself, I strongly support the Environmental Protection Agency's proposed Waste Emissions Charge that will defend the health of all God's children and God's creation. Emissions like methane are impacting children, like my own. Just this past summer, my son was diagnosed with Lyme Disease. Thankfully, with antibiotics, my son made a full recovery, but this was days after anxiety, high fever, and discomfort that my autistic son couldn't verbalize. Emissions are increasing temperatures globally putting more children at risk of the effects of climate change, including increased vector-borne diseases. Not only this but according to the National Survey of Children's Health, more than 37 percent of children suffer from asthma, autism, ADHD, or severe allergies, all of which will
Kellie DuBay 05:10:06	Carolyn, can I ask you to please slow down for our interpreters? Thanks.

Carolyn Heckman	Yes Sorry This will increase in a world impacted by air
Carolyn Heckman 05:10:11	Yes. Sorry. This will increase in a world impacted by air pollution and climate change. I wonder what we could have done differently to better protect and defend our son, but how do we change the air we breathe when the rules are so lacking? The time to act and restrict emissions is now so children like my own don't have to struggle further. To ensure the EPA's implementation of the fee fulfills Congress's goals, the final regulation must continue to include key requirements including the regulatory compliance exemptions only become available after the final standards and plans are in effect in all states and these plans are at least as strong as EPA's 2021 Methane Emissions Proposal. Operators filing for exemption must also demonstrate full compliance across their facilities. Strong and clear criteria must remain in place for operators seeking exemption-based unreasonable permitting delays. When operators seek an exemption for plugged wells, they must clearly demonstrate that the wells have been properly plugged and no longer polluting. Transparent calculations and methodologies to accurately determining an owner or operator's emissions. Lastly, strong protocols so the fee obligations accurately reflect reported emissions, and exemptions are only available once the conditions Congress set forth are met. Our children and family deserve clean air. I am grateful to the EPA for recognizing this urgent health need with this Waste Emissions Charge. I urge the EPA to quickly finalize this proposal with limited flaring, strengthened emissions
	safeguards for storage tanks and pathway for enhanced community monitoring to ensure all God's children can
	breathe clean air. Thank you.
Pye Russell 05:11:50	Thank you for your comments. If there are no clarifying questions, we'll go through again, some of these speakers have already provided comment. So, looking at the list is Nodiah Brent is still on the phone. If you can hit * nine to raise your hand so we know that you are there.
Kellie DuBay 05:12:25	I'm not seeing a hand go up, Pye.
Pye Russell	Okay. Thank you. Similarly, if Margaret Bell is on, if you could
05:12:29	hit * nine to raise your hand so we can see you please.
Kellie DuBay 05:12:50	No hand appears to be going up.
Pye Russell 05:12:55	Okay. If there are any speakers who were from an earlier time slot that were not on when we initially called them and you would like to provide comment now, again, please reach out via the chat or if you are calling in, hit * nine to raise your hand. We can add you to this Speaker Group. Similarly, if there are any folks who did not register to provide comment but would like to now provide oral comment or if you are scheduled to speak at a later time later the during this hearing but would like to go early, again, you can either

me	occase us via the chat or if you are calling in by raising
ea	essage us via the chat or if you are calling in, by raising our hands. It looks like we have some people asking to go arly or to now speak. So Andres Perotti, if you are now on.
Andres Perotti Ca 05:14:11	an you hear me?
Pye Russell Ye 05:14:14	es.
Andres Perotti 05:14:15 on he org ma ex str Me ne fue en fro thi ter pe tec en Th en fue sx Ar ins ex ex ex fac 20 alc its W mo op pro tha int un Or do ma rei sh	reat. Good afternoon. Thanks for the opportunity to speak in this important rule. My name is Andres Perotti, and I am ere on behalf of Oceana, the largest international advocacy ganization dedicated solely to ocean conservation. As any have pointed out in the past few hours, methane is an otterenely potent greenhouse gas, more than 80 times ronger than carbon dioxide on a 20-year time scale. ethane has significant public health impacts. Reducing ethane emissions is a win for the climate and a win for the ealth of fence line communities. Studies show that the fossil el industry accounted for nearly 40 percent of total methane missions in the U.S. in 2021. Tackling methane emissions om oil and gas operations is one of the most important ings that can be done to limit climate change in the short rm. Globally, the International Energy Agency notes that 70 ercent of emissions can be reduced with existing chology. The United States must lead the way in reducing missions of methane and set a standard for other countries. The Waste Emissions Charge is a great opportunity to incourage the reduction of methane emissions by the fossil el industry. — We support the proposed rule and encourage to EPA to limit the scope of the exemptions to the greatest stent allowed under the text of the Inflation Reduction Act. In the wencourage the EPA to require robust reporting and spection for any facilities or companies seeking (emptions, the Waste Emissions Charge for offshore drilling cilities alone could create a revenue of \$40.5 million in 2024, \$54 million in 2025 and \$67.5 million in 2026. This one can create significant incentives for industry to reduce a emissions. But combined with a properly updated Subpart of rule for offshore facilities, this proposed rule can be even ore effective to deter emissions. We would like to take this popularies to update Subpart W. Several studies have shown at the Bureau of Ocean Energy Management's tercontinental shelf emissions inventory severely noterestimates methane emissions may be more t

emissions doubled in line with the results of the study I mentioned, more facilities would be required to report under Subpart W, and therefore, more offshore facilities would be subject to the Waste Emissions Charge. This would also lead to more than double the revenue from the Waste Emissions Charge. By our calculations in 2026, revenue would total 136.5 million under this scenario, creating even more incentives for reduced remissions. To wrap up, I would like to reiterate Oceana's support for this proposed rule, and urge the EPA to limit exceptions to the greatest extent possible. I also would like to recognize without proper measurement offshore, the Waste Emissions Charge cannot be implemented for all emissions, to which it should apply. The EPA must do more to ensure that the updates to Subpart W include proper measurement of methane emissions for offshore facilities. Thank you. If there are no clarifying questions from the EPA panelists. Pve Russell 05:17:47 we are going to go to Madeline Armstrong if you are ready, please. Hi there. My name is Madeline Armstrong, and I am with the Madeline Armstrong 05:18:10 Young Evangelicals for Climate Action, an organization deeply committed to environmental stewardship. I am also a PhD candidate in Earth and Ecosystems Science. As somebody who straddles the worlds of faith and science, I'm acutely aware of the urgent need for action on climate change. We stand at a pivotal moment in history where the decisions we make today will profoundly impact the world for future generations. Thank you for swiftly proposing a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. The Waste Emissions Charge is a critical step towards addressing one of the most potent contributors to climate change, which is methane emissions from the oil and gas industry. This initiative is not just about regulation and fees. It is about safeguarding our planet and ensuring justice for all the planet's inhabitants. At its core, this charge is about accountability. It's about holding operators responsible for their emissions and ensuring they take concrete steps to mitigate their environmental impact. By implementing clear criteria for regulatory compliance exemptions, we can ensure operators are not left off the hook prematurely. We must demand transparency reporting and robust protocols to prevent loopholes and ensure exemptions are granted only when deserved. This initiative is not just about regulation. It is also about opportunity. By creating the first ever direct tax on methane emissions, we are not only incentivizing cleaner practices within the industry, but also generating revenue that can be reinvested into renewable energy initiatives and communities disproportionately affected by environmental degradation. Speaking of disproportional impacts, it is essential to recognize the environmental justice implications of methane emissions. Too

	often, marginalized communities bear the brunt of pollution and environmental degradation leading to devastating health consequences and economic hardships. By targeting methane emissions, we are not only combining climate change but also taking a stand against environmental racism and injustice. Furthermore, we must acknowledge the urgency of the climate crisis. Methane may have a shorter half-life than CO ₂ , but it's impact on global warming is significantly greater in the short term. By addressing methane emissions now, we can make significant strides in slowing the rate of warming and mitigating its catastrophic consequences. In closing, I urge you to continue the support the Waste Emissions Charge for the petroleum and natural gas system. This is not just a matter of policy, it is a moral imperative. As stewards of this planet, we are responsible for acting with courage and conviction in the face of climate change. Let's seize this opportunity to protect our planet for future generations and all the diverse life forms that call it home. Thank you for the opportunity to share my thoughts on the Waste Emissions Charge for the petroleum and natural gas system and everyone's hard work and time put into this initiative. I yield the rest of my time.
Pye Russell 05:21:16	Thank you for your comments. If there are no clarifying questions, we'll double-check again to see if any of the speakers from Speaker Group 10 who were not there when we initially called on them are now online and would like to provide comment. Also, if there are any people who are signed up to speak again later in the day and you would like to go early, we still have time in this Speaker Group to add additional speakers if anyone is interested in going early or again, if you have not yet registered and would like to provide oral comment, we can accommodate you in this Speaker Group. If you are on the phone, you need to hit * nine to raise your hand so we can see you to add you please. Okay. I'm not seeing anyone else. I think what we are going to do because we are running a bit ahead of schedule and it doesn't look like some people from the next Speaker Group have yet signed on. Because we are about 15 minutes early, we are going to take a short recess that was not in the original schedule to provide everyone who is planning to speak at 3:15 to have time to go back online, so we do not miss them and have to go back to them later. We'll be taking a short break and we'll come back to start with Group 11 at 3:15. Thank you, everyone.
Pye Russell 05:23:46	Hi everyone. We are going to get started again after that short recess, and we are going to continue with the oral comment beginning with Speaker Group 11. And so again, we have already heard from several of the speakers from Speaker Group 11. And so, we will start with Elaine Fultz. If you're on, and if you are calling in, could you please hit * nine to raise your hand.

Kellie DuBay	It doesn't show a hand, Pye.
05:24:30 Pye Russell	All right Woll than go forward to Tod I blman if you are an
05:24:35	All right. We'll then go forward to Ted Uhlman if you are on.
05.24.35	And if you are calling in, could you hit * nine to raise your
Kollio DuPov	hand so we could see you, please. No hand at this time.
Kellie DuBay 05:24:57	NO Hariu at this time.
	Okay Wall mayo to Clana Wikle, If you are calling in places
Pye Russell 05:24:59	Okay. We'll move to Glenn Wikle. If you are calling in, please
Kellie DuBay	hit * nine. No hand as well.
Neme Dubay 05:25:15	NO Hariu as well.
Pye Russell	Okay. Next, we'll go to Stephen Helmreich if you are on. If
05:25:20	you are calling in, please hit * nine.
Kellie DuBay	No indication they are participating by phone.
05:25:35	indication they are participating by priorie.
Pye Russell	All right. Next, we'll go to Ken Hughes. If you are calling in,
05:25:39	please hit * nine to raise your hand.
Kellie DuBay	No hand.
05:25:52	The Harran
Pye Russell	Okay. We'll go to Morgan Brown. If you are online or you are
05:25:56	calling in, please hit * nine.
Kellie DuBay	No hand at this time.
05:26:09	
Pye Russell	Okay. Next, we'll go to Michael Dadamo. You should be
05:26:11	promoted to panelist. Once that happens, you can un-mute
	yourself to speak please.
Michael Dadamo	Okay. Can you hear me?
05:26:42	
Pye Russell	Yes.
05:26:44	
Michael Dadamo	Okay. I don't know if you can see me, but my name's Michael
05:26:46	Dadamo and I'm a volunteer with the CR club. And kudos to
	all of you who have been listening all day. It takes a lot of
	patience. I first wanted to introduce myself as a psychologist
	and an expecting grandfather. And today, I want to I'm
	mostly interested in drawing attention to concerns that are
	not necessarily any of these lofty aspirations of fighting
	climate change. I'm sure you have heard a lot of that today.
	Instead, I just want to advance what I, as a member of a
	human race, expect from my fellow human beings. That is to
	act reasonably, and to recognize what a reasonable action is
	on the part of others. So here are a few reasons why I think
	the Waste Emissions Charge seems reasonable. First,
	according to the international monetary fund, the government
	provides an estimated \$11 million per minute to the oil and
	gas industry. Let me repeat that. \$11 million per minute to the
	oil and gas industry in subsidies. So I really find it hard to
	object to letting a charge for excess emissions when you are operating a business with so much government largesse.
	Moreover, pollution, and the damaging effects of climate
1	i violedvel, poliution, and the damaging effects of climate

	change, are estimated to cost the public \$30 trillion by the year 2050. Probably worth repeating. \$30 trillion by the year 2050. Currently, the fossil fuel industry causes \$77 billion in health-related costs alone. So again, these charges, like the one before us today, with the Waste Emissions Charge, seem reasonable in that context, especially since for all of us, there are civil and criminal charges when we break the laws. Two, this emissions charge seems reasonable to me because it includes financial assistance to make these changes so that companies can avoid these charges. So, I'm not pretending that I have knowledge of all the contingencies associated with this government aid, but I'm sure a helping hand looks a lot better than a closed fist in any financial arena. And I should mention as an editorial comment, I, as a psychologist, didn't think it was appropriate to pay my clients to make positive changes. In any event, there is not much time left. Global methane pollution is growing at historic rates. It is currently at an all-time high. A surge since the start of the millennium has led to the highest concentration of atmospheric methane since the NOAA first measured it in 1984, that's the National Oceanic and Atmospheric Association. And last year saw the largest year over year increase on record. Methane is short lived in the atmosphere, seven to eight years, but a molecule of it traps 84 times more heat than a molecule of carbon. That fact alone makes the urgency of moderating the effects essential to avoid the catastrophic effects of global warming. I appreciate the
Pye Russell 05:30:56	opportunity to share these thoughts and opinions. Thank you for your comments. If there are no clarifying questions from EPA panelists, we have had some changes to the next speakers up. So if there are any other of the people that were on or in Speaker Group 11 that did not or were not here when we originally called your name, please let us know via the chat, or if you are calling in, by hitting * nine to raise your hand so that we can see you. If you are online or on the phone now and you would like to provide your comment now, and so while we are looking for people, I think what we are going to do, and again, we welcome additional speakers or people who have not preregistered to speak if they are interested in speaking now, to message us in the chat or if you are calling in to hit * nine, because we'll also have some extra time, it looks like, at the end of this Speaker Group, or if you are scheduled to testify or provide comment later, and would like to do so early, we would likely be able to fit some people in to this group as well. So, it looks like Erich Nolan, you are up next. You should be promoted to a panelist and be able to un-mute yourself and provide your comment. Hi, this is Erich. Can you hear me okay?
05:32:51	, , ,
Pye Russell 05:32:55	Yes.

Erich Nolan 05:32:57

Hi. My name is Erich Nolan, and I'm with Stewarding Design LLC. First, I want to say to the members of the committee, thank you for this opportunity to provide my testimony. I want to start by expressing my appreciation for the service that you and your Agency provide to our nation to protect the environment, and to protect lives. It's an honorable cause, and I truly do appreciate the work that you do. I grew up in the oil fields Army base in Texas, and I'm seen the impacts of the petroleum industry on the environment. Perhaps, ironically, being surrounded by oil and natural gas production actually helped form my desire to make a difference for the environment. Well, I now reside in California, I've spent much of the last year back in west Texas supporting my elderly parents. And again, I'm seeing, hearing, and smelling the impacts of the petroleum industry. Every day I see the incredible truck traffic on the highways, I see litter scattered all across the countryside, at night I see the numerous flames emanating from the flare stacks spread for miles and miles. Almost every evening, I smell hydrogen sulfide wafting in the air, sometimes so strong it seeps through the doors and windows of our house. And even in the day, I see black soot spewing from some of the flares, indicating inefficient burning of methane. My background is in geosciences and environmental management. Further, I am a Christian who believes that God designed this planet to provide resources for our wise use. I believe that God set up the ecosystem services that operate on our planet, and provide for our lives, and that He orchestrated the circular systems that are demonstrated in the biogeochemical cycles that maintain life on Earth. I believe that scripture taken as a whole is clear that we are to responsibly and respectfully use the resources we have been provided while still caring for and protecting all our life. Now, according to the World Bank in 2022, flaring of methane in the U.S. alone reached a volume of almost 8 billion cubic meters with an estimated equivalent natural gas sales value of about \$914 million. Further, recent studies indicate that flair efficiencies are only 91 percent, rather than the assumed 98 percent. This means that more methane is emitted directly to the atmosphere, along with toxins such as hydrogen sulfide, volatile organics, and fine particulates. So, it's good that EPA is establishing rules to provide more controls. Providing economic incentives to drive innovation is important and is an important aspect in this program, and I applaud that, but so is establishing regulatory financial burden incentives, both are needed policy tools. With that said, it is critical that the parameters and definitions promulgated in the rule make a true difference. For example, the definition of a Waste Emissions Charge applicable facility may provide for real change, or may just provide ways to avoid the Waste Emissions Charge. I must say that I am concerned that the Waste Emissions Charge will only have

	small overall effects. Certainly, it will apply to larger emitting facilities, but it will likely have no applicability to the many, many fuel flairs scattered across the countryside. One flare at a tank battery will not meet the threshold of 25,000 tons CO ₂ e. All flairs across an entire named field may, for example, based on data from the world bank again, one operator in the Goldsmith field flared approximately 1.47 million cubic meters of methane in 2022. This is a large amount but it will not meet the Waste Emissions Charge threshold. However, the field, as a whole, may meet that threshold depending on the efficiency assumption. So, I ask EPA to consider how the definition of Waste Emissions Charge applicable facility can consider, and apply to, field flairs. The people and communities around these fields deserve protection. Again, thank you for your time.
Pye Russell 05:36:57	Thank you for your comment. If there are no clarifying questions from the EPA panelists, we have another volunteer to go early. So Joshua, if you are online and ready to go,
Joshua Groeling	Joshua Groeling, you are up next, please. Can you hear me?
05:37:41 Pye Russell 05:37:44	Yes.
Joshua Groeling 05:37:45	Okay. Awesome. Is my camera okay as well? It's not showing me on here.
Pye Russell 05:37:49	Yes, we can see you.
Joshua Groeling 05:37:50	All right. Wonderful. Thank you. Can I start whenever?
Pye Russell 05:37:55	Yes, go ahead.
Joshua Groeling 05:37:58	All right. My name is Joshua Groeling and I'm writing Dear Administrator Regan, my name is Joshua Groeling, and I'm writing as a college fellow with the Young Evangelicals for Climate Action. I'm 19 years old, in my second year of college in Indiana, and I'm studying sustainability and communications. I want to first thank you for acting swiftly to propose a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. As an evangelical Christian, committed to defending life, and commanded by Jesus to love my neighbor as myself, I strongly support the Environmental Protection Agency's proposed Waste Emissions Charge. As John 10:10 says, "Jesus came to Earth so we all might have life to its fullest abundance and in a right relationship, not only with our father, but with his creation as well". This charged a powerful step in the right direction for creating a better relationship with nature, and with brothers and sisters that we share the Earth with.
Kellie DuBay	Can I ask you just to slow down for our interpreters?

05:38:45 Joshua Groeling Yes, I'm so sorry. Sorry about that. This charge is a powerful 05:38:50 step in the right direction for creating a better relationship with nature and with our brothers and sisters that we share the Earth with. I believe that it is so important, that we as a people expand our views beyond ourselves, and our current time here on Earth. As one of my favorite writers, Takehiko Inoue says, "preoccupied with a single leaf and you won't see the tree. Preoccupied with a single tree and you will miss the entire forest." If we focus too much on the here and now, and focus on immediate profits and growth, we will miss the potential we could have had in the future. That is why I have faith that this charge will help to curb emissions significantly. and create a better, more sustainable future for all of humanity. I believe that the Waste Emissions Charge is especially important because of increasing global trends of methane emissions. As we approach 1.5 degrees Celsius in global warming, it is nothing short of alarming to see methane emissions increase from year to year. In 2019, methane emissions, in parts per billion, rose by 9.6 parts per billion. The year after that, it skyrocketed to 15.1 parts per billion, and then even higher, to 17.9 parts per billion in 2021. This trend of rising methane emissions seems contrary to professed goals of the Paris Climate Accord, and highlights the particular need for this charge in the modern times. Even outside of climate change, methane is a danger to society because of other compounds that are often produced with it. Smog, causing volatile organic compounds, can worsen asthma, respiratory disease, cause heart disease, and lead to early death. Surely people do not deserve these afflictions, just because of their choice of where to live, or lack thereof, of a choice. To ensure the EPA's implementation of the fee fulfills Congress's goals, the final regulation must continue to include key requirements, including regulatory compliance exemptions only become available after final standards and plans are in effect in all states, and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for exemption must also demonstrate full compliance across their facilities. Strong and clear criteria must remain in place for operators seeking an exemption based on unreasonable permitting delays. When operators seek an exemption for plugged wells, they must clearly demonstrate that their wells have been properly plugged and are no longer polluting. Transparent calculations and methodologies to accurately determine an owner or operators net emissions. And finally, strong verification protocols, so that fee obligations accurately reflect reported emissions, and that exemptions are only available once the conditions Congress set forth are met. Our children and families deserve clean air, an

Pye Russell 05:41:50	environment that will allow them to enjoy the beauty of creation. I'm grateful to the EPA for recognizing this urgent health need, with its Waste Emissions Charge. I urge the EPA to quickly finalize this proposal with limited flaring, strengthened emissions standards for storage tanks, and a pathway for enhanced community monitoring to ensure that all God's children can breathe clean air. Thank you for your work on this important matter. Thank you for your comments. If there are no clarifying questions from the EPA panelists, I'll ask again if there is anyone online or calling in from Speaker Group 11 that was
	not here when we initially called your name, and you would like to provide your oral comment now, please let us know. And again, do so if you are calling in, by hitting * nine on your phone. Also, if you are on the webinar right now, or calling in, and are scheduled to provide comment later in the day but would like to do so early, you can let us know if you would like to do so and we can add you to this time slot. We'll give folks maybe half a minute again to go ahead and let us know if they would like to provide comment early, or if they had not registered, but would like to now, to let us know. We are still running a little bit ahead of schedule. So, if we don't hear from anyone, we'll go ahead and move to Group 12, the group of speakers. But again, we'll give it another 30 seconds to a minute to see if anyone else who has registered, but not yet read their comment, would like to do so now. If anyone would like to do so early, or, again, if anyone had not yet registered but would like to read a comment, now is an opportunity to do so.
Kellie DuBay 05:43:42	I do believe we have a volunteer from Group 12 that would be willing to go now, and I do see a hand up as well. So, I think if we want to start with Jack Joseph, then I can get you a line up following Jack.
Pye Russell 05:44:04	Sounds great. Thank you. So, Jack Joseph, we'll go to you now if you are ready.
Jack Joseph 05:44:28	Can you hear me now?
Pye Russell 05:44:30	Yes.
Jack Joseph 05:44:32	Okay. Thank you. Well good afternoon, panel members and thank you for this opportunity. Again, my name is Jack Joseph and I am a retired health care information technology consultant. I am also a proud parent, a leader in Vineyard Columbus Ohio Church Creation Care Ministry, a Creation Care Champion with the Evangelical Environmental Network, and most importantly, a passionate believer that God, our creator, has committed us to all love and care for his creation. As an Evangelical Christian, I believe that one of the primary ways we are called to be obedient to God, is to take care of our neighbor, which includes all of humanity. The

	T
Pye Russell 05:48:42 Nancy Yuen	following passage well illustrates this command, and it comes from Leviticus 25:18-19, "Follow my decrees and be careful to obey my laws and you will live safely in the land. Then the land will yield its fruits and you will eat your fill and live there in safety." So, I have been a government employee and have consulted with multiple federal, state, and local government agencies. I believe this gives me a perspective on the challenge that you, as regulators, have to create, implement, and enforce clear and balanced government regulations. The U.S. Environmental Protection Agency is once again challenged to advocate for the citizens of this country and ultimately, the Earth. I commend your efforts in addressing this critical issue. It has been recently reported that the critical 1.5 Celsius global warming threshold has been reached over the last 12 months for the first time. Methane emissions have a disproportionate impact on global warming. Methane has more than 80 times the warming power of carbon dioxide over the first 20 years of its reaching the atmosphere. Methane exposure has also been linked to multiple health conditions, with children being especially vulnerable. Reducing methane emissions will have significant short term and long-term positive impacts. To this end, I ask the EPA to adopt Waste Emission Charge rules that will fulfill Congress's goals, specifically the final regulations must include these key requirements. That regulatory compliance exemptions only become available after final standards and plans are in effect, and that these plans are at least as strong as the 2021 methane emission proposals. Strong and clear criteria must be established for operators seeking an exemption based upon unreasonable permitting delays. When operators seek an exemption for plugged and no longer polluting. Transparent calculations and methodologies to accurately determine the owner's or operator's net emissions. And finally, strong verification protocols so that the fee obligations are accurately reflected. Th
05:49:25 Pye Russell	Yes.
05:49:26	
Nancy Yuen 05:49:28	Okay. Thank you for allowing me to speak at this hearing. My name is Nancy Yuen and I live in Albuquerque, New Mexico. Methane gas is known to be many times more effective than carbon dioxide at trapping heat in the atmosphere. Reducing atmospheric methane is the fastest and most efficient method of reaching short term goals to mitigate the climate crisis. Oil and natural gas production accounts for the vast majority of

industrial methane emissions and these producers must finally be held accountable. They must pay to help mitigate the situation they themselves have caused. Companies can avoid the fee simply by complying with emissions levels set by the Inflation Reduction Act. It is their choice to not use the readily available, and easily affordable, if not completely cost free after government subsidy, technologies to reduce and track their emissions. Therefore, it is their decision to pay the fee rather than clean up their operations. Thank you. Thank you for your comments. If there are no questions from the EPA panelists, we can move onto the next person who has asked to join this group, and that is Ann Mesnikoff. Ann, if you are online, you should be promoted to a panelist and be able to un-mute yourself.
Hi. You got to me faster than I thought you would. Hold on
one second. Ready?
Yes. Start whenever.
Okay. Please feel free to tell me to slow down. I do have the tendency to speak pretty fast. My name is Ann Mesnikoff, I'm the federal legislative director for the Environmental Law and Policy Center. ELPC is the Midwest's leading public interest, environmental, and legal advocacy organization. I appreciate the opportunity to testify today in support of EPA's proposed Waste Emissions Charge. Cutting methane emissions across oil and gas industry is critical to addressing the climate crisis. The proposed Waste Emissions Charge, part of the overarching Methane Emissions Reduction Program, is a new tool in EPA's toolbox, established in the historic Inflation Reduction Act, to achieve this important goal. ELPC testified in support of EPA's rule under section 111 of the Clean Air Act, and appreciates the role that important final rule will play. This new charge will help ensure action is taken at the largest sources of upstream oil and gas production, and, of course, across the transportation and storage of methane. The United Nation's Intergovernmental Panel on Climate Change reports make clear the causes of climate change, it's devastating impacts, and the absolute urgency of action now. January 2024 was the warmest January on record, and February 2023 through January 2024 was the warmest 12-month stretch on record. Methane is a climate super pollutant, more than 80 times as powerful as carbon dioxide on a 20-year time scale. Tackling these large sources of methane will also have important health benefits because the methane emitted at oil and gas sites is mixed with harmful pollutants like VOCs and benzene. Climate change is already bringing havoc globally, and we are seeing impacts across the Midwest and Great Lakes states where ELPC works. Climate change threatens the Great Lakes ecosystems, fresh water supplies, and the economies that depend on them. The

	changing climate brings increased storm intensity, changes to water temperatures, flooding, and runoff of algal growth; all presenting significant and increasing threats to the Great Lakes. And changing weather patterns, heat drought, and flooding impact agriculture. For my colleagues in Michigan with plans to enjoy winter snow activities in the Upper Peninsula, snow is scarce. Approximately four and a half million Americans across the Midwest, 3.3 million in Ohio alone, live within a half mile of oil and gas sites and/or equipment and the toxic pollution they emit. It appears that from North Dakota to Ohio and Michigan, communities will benefit from EPA's implementation of this new charge. Importantly the Waste Emissions Charge is part of the larger program geared towards helping sources of methane reduce waste, and emissions overall, including the announcement from EPA and DOE regarding the one billion in funding to reduce methane. In addition, companies across the sector are pledging to limit their emissions below the threshold for the charge. Technologies are cost-effective and available to achieve low or zero emissions in this sector. EPA must do all it can to avert the worst impacts of the climate crisis, by finalizing the strong, possible, Methane Waste Emission rule as soon as possible, as well as implementing the methane rule announced in December of 2023. Both together will have important benefits for the climate as well as for public health. We'll submit more detailed comments to the docket and appreciated the opportunity to testify today. Thank you.
Pye Russell 05:55:05	Thank you for your comments. If there are no clarifying questions, we can move onto the next person who has asked to join this Speaker Group. And Edward George, if you are online, you will be promoted to panelist and will be able to unmute yourself, and provide your oral comment.
Kellie DuBay 05:55:54	Edward, we see that you are a panelist. If you could unmute, you should be able to join us. I don't think we are able to unmute him from our side. Edward, are you able to hit your unmute button? There you go. Oh, I thought I saw him. There you go.
Edward George 05:56:28	Thank you. Okay. Excuse me just one moment. Thank you. My name is Edward B. George. I am a long-time resident of Lubbock, Texas, a professor of classical languages at Texas Tech University, and the secretary of the Lubbock Chapter of Citizen's Climate Lobby, with which I have volunteered for the last eight years. I am grateful for the opportunity to testify. Reducing methane pollution from the oil and gas industry is the fastest, most cost-effective way to slow the rate of climate change. Methane in the atmosphere is responsible for \$77 billion in annual U.S. health damages, including thousands of early deaths and childhood asthma cases. We have firsthand acquaintance with this phenomenon out here in the southwest. Driving through the Permian Basin in west Texas and eastern New Mexico, we regularly observe stacks that

Pye Russell 06:00:02	are flaring waste gases. Form an elevated point in eastern New Mexico, where one can see miles westward, a broadly spread atmospheric haze lies over the landscape. A friend of ours asked an oil field worker of his acquaintance what this was. The reply was that it is methane. We have seen the same phenomenon in our travels. Those of us who live in west Texas, in addition are singularly aware of the challenges in regulating methane release, in the interest of the health of the public. I cite the statement by Commission Shift Executive Director, and west Texas landowner, Virginia Pelosios, in the Texas Railroad Commission's January 24, 2024 open meeting. Ms. Pelosios's statement follows: "Since 2010, the railroad commission has only issued penalties for flaring rule violations 11 times, out of hundreds of violations that were detected, and tens of thousands of permits that were issued." These data, combined with the field observations that have found operators venting and flaring without permits, indicate the Commission's inspection and compliance methods need improvement. The Railroad Commission, of course, has primary regulatory jurisdiction over the oil and natural gas industry. Ms. Pelosios's statement shows the especially acute need, in Texas, the kind of accountability that the EPA rule is designed to promote. Environmental regulations run the risk in Texas, of being labeled as job killing measures. On the contrary, as the Sierra Club reports, there are over 225 million factory and service companies in the methane mitigation industry. With nearly a thousand employee locations across the country, and further, 75 percent of manufacturing and 88 percent of service groups, report that they would create more jobs if national methane standards were reinstated. The greenhouse gas clock is ticking. The time to act is now. Thank you for the opportunity to testify. Thank you for your comments. If there are no clarifying questions, I will just go back through the list of people who are in Speaker Group 11 whose names
	names. Looking at that list, if you are online right now, or you are calling in, please let us know. And again, if you are calling in, do so by hitting * nine to raise your hand and let us know you are there. Elaine Fultz, if you are there and would like to provide comments, please let us know. Ted Uhlman also. It looks like Glenn Wikle is available on, and available to speak now. Glenn, if you are there, we can promote you to a speaker and you should be able to unmute yourself momentarily.
Glenn Wikle 06:01:12	Okay. Looks like I'm on. Apologies, I got messed up by time zone differences. My name is Glenn Wickle, I am an engineer and data scientist in Santa Fe, New Mexico, supporting work of climate scientists. We are sad, we are depressed, and we are angry as we watch the healthy climate and biosystems on

our planet unravel a little bit every day. Glaciers and sea ice systems are disappearing at an alarming rate, super fires burn across entire continents, aquifers are drying up, and thousands of species are going extinct each year. The average person is barely affected by this as they go about their daily lives, but these are the warning signs of the climate breakdown, which is coming in a few decades. As policy makers at the EPA, I'm sure you understand that climate scientists tell us nearly every day, that fossil fuel emissions must completely phase out over the next 10-15 years, in order to preserve the climate systems we depend upon for commerce and life as we know it. Global methane pollution is growing at historic rates, and is currently at an all-time high. Last year saw the largest year over year increase on record. According to a study by Boston University, oil and gas production is responsible for \$77 billion in annual health damages, including thousands of early deaths and childhood asthma nationwide. In my home state of New Mexico, a massive increase in oil and gas activity has recently caused a spike in related air pollution, endangering the health of children and residents, and frontline communities, which are often communities of poverty and color, whereas we used to be attainment of ozone rules, we are now at risk of nonattainment. More than 144 thousand New Mexicans, including 28 thousand children, live or attend school within a half mile of oil and gas production facilities. Fixing leaks of a valuable commodity is common sense, both the producers and local residents will be better off. Leak prevention technology, tested and deployed at scale, in the United states, will most likely become standard equipment adopted around the world, requiring producers to reduce emissions while establishing an industry culture of respect for the environment, and the health of neighboring communities. While the governments around the world figure out how to prevent devastating planet warming of more than two degrees Celsius, it is important that we do everything in our power to reduce greenhouse gas emissions. Please set waste emissions fees high enough to maximize improvement of health outcomes and reduce danger to our climate. Thank you for listening.

Pye Russell 06:03:59

Thank you for your comments. If there's no clarifying questions, I'll go through the remaining names from the speakers in Group 11, from people we have not heard from yet. If Stephen Helmreich, Ken Hughes, or Morgan Brown are online, and would still like to provide oral comment, please let us know, and again if you're calling in hit * nine to raise your hand so we can see you and allow you to speak.

Kellie DuBay 06:04:41	I'm not seeing any indication that we have speakers on the phone. We have one of our interpreters with us. I think at this point, Pye, we are probably ready for your decision as to whether you would like to move into recess or hold it open until 4.
Pye Russell 06:05:18	Yes. Thank you. I think what we'll do now, we have pretty much caught up on time, so what we'll do now is we'll have a recess and we'll be starting again at 4:05. So again, my name is Pye Russell and I have been chairing this hearing session. I want to thank everyone who has shared comments so far on EPA's proposed action. We'll again take a little bit more than a 5-minute recess now and we will start again at 4:05 p.m. Eastern Time, and we'll be starting with Speaker Group 12 and a new EPA chair and new EPA panelists when we come back. So thank you again, everybody, for your participation.
Melissa Weitz 06:06:13	Hello everyone, welcome back from the break. My name is Melissa Weitz. I am an environmental policy analyst in EPA's Office of Atmospheric Protection, and I am now chairing this session of the Waste Emissions Charge for Petroleum and Natural Gas Systems virtual public hearing. I would like to ask our next group of EPA panelists to introduce themselves. I will turn it to Jameel first.
Jameel Alsalam 06:06:39	My name is Jameel Alsalam. I'm an economist in EPA's Office of Atmospheric Protection.
Sharay Jackson-Dixon 06:06:48	Good afternoon, I'm Sharay Jackson-Dixon, and I'm working within the Office of Atmospheric Protection Climate Change Division and I'll be one of your panelists.
Melissa Weitz 06:07:00	Thank you. A quick reminder about providing testimony. When I call on you to speak, you'll receive an invitation to become a panelist on Zoom. You will need to accept the panelist invitation when it pops up on your screen. You'll then have the ability to unmute your line. While providing testimony, you're welcome to activate your camera by clicking on the start video icon. If you're joining by phone and I call your name, please press * nine to raise your digital hand to let us know you're here. You'll then press * six to unmute and speak. Please state your name for the record, a four-minute timer will start when you state your name. If you're testifying by phone, the timekeeper will alert you when you have one minute remaining. To be fair to everyone, we are going to strictly enforce the four-minute time limit. We will now begin with the speakers in Group 12 as listed on the next slide. Our first speaker listed is Joshua Groeling. Is Joshua available?
Kellie DuBay 06:08:10	He was with us in a previous session.
Melissa Weitz 06:08:16	Our next speaker is Kim Lauren. Is Kim on the line? Again, press * nine to raise your hand if you're present.

Kellie DuBay	We don't see Kim's name in the participant list, and I'm not
06:08:38	seeing a hand go up.
Melissa Weitz	Okay, the next speaker listed is Jack Joseph. He's previously
06:08:45	spoken. Our next speaker who has not already presented is
00.00.10	Greg Pagluizza. Greg, are you online and available to speak?
	Greg has joined us. Whenever you're ready, please unmute.
	Thank you.
Greg Pagluizza	Can you hear me?
06:09:20	can you nour mo.
Melissa Weitz	Yes, thank you.
06:09:21	. 55, 11.5 }55
Greg Pagluizza	Great. My name is Greg Pagluizza, and I'm writing as a
06:09:22	creation care champion with the Evangelical Environmental
	Network. I'm a retired health care CFO. My experience was
	one which required me to balance the finances of the
	organization with the needed delivery of healthcare to our
	patients. I always sided on what was best for the patient. I
	would ask the same of the EPA, which has the responsibility
	to protect the lives of Americans. As a Christian, I'm
	commanded to defend life and love my neighbor. This
	proposal supports each of these values, and as such, I
	strongly support the Agency's proposed Waste Emissions
	Charge. Illinois, where I live, is not a large producer of natural
	gas nor petroleum but is a large refiner of fossil fuels. Illinois
	ranks 44th in the nation for air quality. Poor air quality
	impacts all who call Illinois home. When it comes to the
	pollution of wells, it knows no boundaries, and we are
	impacted by them. I am of the generation using coal to heat
	our house. Coal dust was a way of life. Coal was used to
	produce electricity at a power plant two miles away. We knew
	the air was dirty, but we didn't give it a thought as that's the
	way it was. We didn't know how negatively it impacted our
	lives. Now we know that being around the coal before and
	after its burning was horribly unhealthy. Much has been done
	to address the pollution from coal, and it still needs work.
	Now is the time for the same to be applied to methane and oil
	production. The millions who live near the production areas
	are quietly putting their health at risk. I think of Cancer Alley
	in Louisiana as an example. Any work done to mitigate the
	risk is the moral thing to do. During my lifetime, I have
	experienced the change in the environment. My children,
	grandchildren, and future generations can be living in a very
	different climate than even today. Necessity to reduce fossil
	fuel waste with significant impact of methane needs attention now. In an article from Life Sciences Intelligence, it's noted
	that the economic impact to pollution is staggering. It's often
	overlooked when the naysayers speak of the cost of
	mitigating the pollution. It's estimated that the financial cost to
	•
	our health for our fossil fuel generated air pollution and climate change surpasses 820 billion dollars in health care

	costs each year. A burden falling heaviest on vulnerable communities but also shared in part by everyone in the U.S. The upfront investment to address leakage would have significant return on investment because of the savings on healthcare costs. For those living and working closely to the wells, negative impacts are higher. In the new geospatial analysis released by EarthWorks and FracTracker, it shows that more than 17.3 million people, including 3.9 million under the age of 18, live, work, or go to school within a half mile health threat radius of active oil and gas production operations. On a more granular level, it impacts babies with increased risk of congenital heart defects along with the brain, spine, and spinal cord defects. There is an 86 percent times exposure to cancer-causing chemicals. There is 25 percent increase in low birthweight infants and significant reductions to infant health. Toxic pollution from oil and gas development is also released alongside methane pollution which can be harmful to health. Our children and families deserve clean air. I'm grateful to the EPA for recognizing the urgent health need with the Waste Emissions Charge. I urge the EPA to act quickly to finalize proposals with limited flaring, strengthen emissions standards for storage tanks, and a pathway for enhanced community monitoring to ensure that all God's children can breathe clean air. Thank you for this work on this important matter. Thank you.
Melissa Weitz 06:13:14	Thank you for your comments. Any questions from the panelists? We'll move on to our next speaker, so Erich has already spoken. Is Jerry Rivers on? I think I muted myself. Is Jerry Rivers available to speak? If you're on the phone, please press * nine so we can see that you're here.
Kellie DuBay 06:13:50	I don't see a hand, Melissa.
Melissa Weitz 06:13:54	Thank you. Our next speaker is Anna Shoup. Anna, are you available to speak now?
Kellie DuBay 06:14:10	It looks like she will be promoted to panelist shortly.
Anna Shoup 06:14:25	Hi, my name is Anna Shoup, and I'm speaking to you as a Christian who is deeply concerned about the climate crisis. I'm also a college fellow for Young Evangelicals for Climate Action. Thank you for acting swiftly to propose a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. Ideally this rule would provide fiscal incentive for large oil and gas plants to reduce methane emissions, which is an important step towards the ultimate goal of reducing our dependence on fossil fuels and moving towards a renewable energy economy. In the short term, this important monetary repercussion for emissions has potential to impact current warming, particularly as methane emissions account for 25 percent of the warming we are seeing today. Regarding the WEC itself, I have particular requests that I

understand to be necessary to ensure the efficacy of the proposed legislation. I ask that regulatory compliance exemptions only become available after final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. I ask that operators filing for exemption must demonstrate full compliance across their facilities. Furthermore, strong and clear criteria must remain in place for operators seeking exemption based on unreasonable permitting delays. When operators seek an exemption for plugged wells, they must demonstrate that their wells have been properly plugged and no longer polluting. There must be transparent calculations and methodologies to accurately determine an owner or operator's net emissions and strong verification protocols so that fee obligations accurately reflect reported emissions and that exemptions are only available once conditions Congress has set forth are met. There are so many reasons why this piece of legislation and others like it are important. The need of all for clean air, clean water to drink, and our own agricultural dependence on the land, the need for a planet with the predictable weather patterns, tenable natural disasters, and the survival of non-human creatures as they compose our precious biodiversity, just to name a few. However, I assume that most of us here likely know these things already, so I want to consider the complexity of the problems that we're facing in considering this bill. It seems to me that there is no perfect path forward. With so many contributing factors to our mounting ecological and climate crises, there is no one solution. Fiscal repercussions for emissions such as methane proposed in the WEC will not be enough. This law will not solve the problem that we face, and the unintended consequences of changes in societal infrastructure, such as the WEC as well as future efforts, are unforeseeable and scarv. However, I deeply believe we need to take steps forward despite these complex realities. I hold the belief inextricably informed by my Christian faith that these steps will not be taken in vain. I believe it is the will of God, that his children, particularly the most vulnerable among us, will not suffer the crisis that we have created. And that the work of averting it will be made perfect in its alignment with his will. In other words, despite the violent size of the problem, as well as our inevitable imperfection in solving it, I hold to the conviction that the hard work of well-intentioned people to create a better world has to be worth something or perhaps everything when all things come to pass. Thank you for your work on this important matter.

Melissa Weitz 06:18:13 Thank you for your comments. Any questions from the panelists? Great. I'll now ask if anyone who was listed for this session and hasn't spoken yet, could you please send us a message in the chat to let us know you're here or press * nine if you're calling in over the phone. Similarly, if you were

Melissa Weitz 06:19:09	listed in any of the previous sessions and haven't had a chance to give your comments, please let us know by sending a message or pressing * nine. If you are registered to speak later today and are online now and available to provide your comments, please let us know and we can move you up also. Thank you. Our next speaker is Michael Matchell. Whenever you are ready, please unmute yourself and provide your comments. Thank you.
Michael Matchell 06:19:29	Thank you very much. My name is Michael Matchell and I'm writing as a Christian care champion with the Evangelical Environmental Network, an evangelical Christian, a private citizen, a professor, and a graduate of the Master of Public Administration program at the University of Southern California. Thank you for acting swiftly to propose a rule to cut methane and other harmful pollutants from new and existing oil and gas operations. As an evangelical Christian committed to defending life and committed by Jesus to love my neighbor as myself, I strongly support the EPA's proposed Waste Emissions Charge. I live in Los Angeles county, which is among one of the greatest oil and gas producers in the nation. I have seen firsthand the ways that methane and other pollution from oil and gas development have impacted communities here in L.A. It's important to me that my community be protected from the pollutants and the effects of methane release. Methane is responsible for 25 percent of the human produced warming we experience today. The U.S. like the rest of the world is warming and it is impacting our health. Higher temperatures make smog worse which threaten adults and children with respiratory or cardiac issues and associated with the spread of vector-borne diseases like Lyme Disease. Extreme heat waves kill more people than any other natural disaster, with longer, hotter, and more frequent heat waves on the rise, heat-related deaths are rising too. While two recent studies from NASA show methane emissions in and around L.A. county are on the decline due to regulations put in place by the state, this rule by the EPA will help secure this downward trend here in L.A. and secure the decline in methane emissions nationally. To ensure that the EPA's implementation of the fee fulfills Congress's goals, the final solution should include key requirements that regulatory compliance exemptions only become available after final standards and plans are in effect in all states, and that these plans are at least as strong as EPA's
	demonstrate their wells have been properly plugged and are

	no longer polluting. Fourth, transparent calculations and methodologies accurately determine an owner or operator's net emissions and, finally, strong verification protocol so that fee obligations accurately reflect reported emissions and that exemptions are only available once the conditions Congress sets forth are met. In conclusion, our children and families deserve clean air. I'm grateful to the EPA for recognizing this urgent health need with its Waste Emissions Charge. I urge the EPA to quickly finalize this proposal with limited flaring, strengthened emissions standards for storage tanks, and a pathway for enhanced community monitoring to ensure all God's children can breathe clean air. Thank you for your work on this important matter.
Melissa Weitz 06:22:40	Thank you for your comments. Any questions from the panelists? Thank you. Our next speaker is Ron Dixon. Ron, whenever you are ready, please unmute yourself and provide your comments. Thank you.
Ron Dickson 06:23:17	Can you hear me now?
Melissa Weitz 06:23:19	Yes, thank you.
Ron Dickson 06:23:21	Thank you. My name is good afternoon. My name is Ron Dickson, I'm a member of the Evangelical Environmental Network, I'm also a member of the citizens climate lobby where I co-Lead Colorado's Conservative Policy Caucus. Thank you for acting swiftly to propose a rule to cut methane and other harmful volatile organic compound emissions from new and existing oil and gas operations. As an Evangelical Christian committed to the sanctity of life, I strongly support the proposed Waste Emissions Charge mitigating further warming of the Earth to slow and eventually stop the deleterious impacts of climate change. Emphasis on human welfare is imperative, so is addressing the chronic health effects of VOCs emitted from oil and gas operations along our front range communities in Colorado. I spent approximately 15 years of my career supporting regional air quality studies focused on air toxics, photo chemical smog, and visibility. After more than 50 years of regulatory effort, attainment of the ozone standards throughout many of our metropolitan areas of the U.S. remains out of reach. Command and control regulatory measures to control emissions have failed. I applaud the U.S. EPA for taking an economic or market-based approach placing a fee on methane emissions. This rule provides a trailblazing approach to address waste methane emissions today, and a policy approach, for tomorrow, to achieve needed greenhouse gas emissions reductions. Specific to the Waste Emissions Charge for Petroleum and Natural Gas Systems rule, the final regulation must continue to include the following five key elements to fulfill Congress's goals. One,

	regulatory compliance exemptions shall only become available after final standards and plans are in effect in all states and that these plans are at least as strong as EPA's 2021 methane emissions proposal. Operators filing for exemptions must also demonstrate full compliance across their facilities. Two, strong and clear criteria shall remain in place for operators seeking an exemption based on unreasonable permitting delays. Three, when operators seek an exemption for plugged wells, they shall clearly demonstrate their wells have been properly plugged and no longer leaking. Four, transparent calculations and methodologies to accurately determine an owner or operator's net emissions. Five, strong verification protocols so that fee obligations accurately reflect reported emissions and that exemptions are only available once the conditions Congress set forth are met. I live on the front range of Colorado where oil and gas production wells are intertwined closely with our communities. Our children and families deserve clean air. I'm grateful to the U.S. EPA for recognizing this urgent health need with this Waste Emissions Charge. I urge the EPA to quickly finalize this is proposal with limited flaring, strengthened emissions standards for storage tanks, and a pathway for enhanced community monitoring to ensure that all God's children can breathe clean air. Thank you for your time.
Melissa Weitz 06:26:38	Thank you for your comments. Any questions from the panelists? If not, thank you. Again, we ask if we missed anyone from this Speaker Group or earlier Speaker Groups, that would like to provide their comments now. Please press * nine to raise your hand or contact us through the chat on Zoom. If anyone else currently on the line would like to provide their comments early, just reach out to us through the chat or by pressing * nine.
Kellie DuBay 06:27:25	I would just add Melissa, we noticed that there are some speakers from other Speaker Groups that are here and we have reached out to them via chat. So, if you haven't checked the chat, you might want to do that. And if you're willing to speak earlier, we requested to see if you might be able to volunteer to go sooner than your originally slotted time. You could also raise your hand to indicate if you would like to go, versus responding to us in the chat. I'm not seeing any hands go up. I just saw somebody who volunteered to go next, who is in another group. Kathryn Westman.
Melissa Weitz	Great, thank you. So Kathryn Westman, we invite you to
06:28:34	provide your comments now. So we'll be sending the information to make you a panelist and then whenever you're ready please unmute and provide us with your comments. Thank you.
Kathryn Westman	Hello. Can you hear me?
06:28:07	,

Melissa Weitz	Yes, thank you.
06:28:09 Kathryn Westman 06:29:12	Thank you. Hi, my name is Kathryn Westman. I'm a concerned citizen, registered nurse, who has incidentally lost a child from asthma. I'm a person of faith wanting to have fair and clean air and water for everyone. I'm a grandmother of three children who I hope their future can hold a healthy Earth. So for many years, I have been appalled by the health and safety of our citizens that has been ignored by allowing the oil and gas companies to emit dangerous toxins. Today, I applaud the changes considered here. They are past due but should be approved now and even strengthened where possible. I echo the recommendations made this morning by speaker Alice Lou, speaker number 36 of the clean air councils. I highlight the need that the EPA should include requirements under the well plugging exemption that show wells are properly plugged and are no longer polluting. I would question self-reporting in view of the many past violations of the oil and gas industry. As a resident of Pennsylvania, I'm very aware of those violations. I know the EPA needs more employees to efficiency sorry, to efficiently and effectively do the jobs we ask them to do. I ask that the proposed regulations be as tight as possible, and that the EPA be equipped to enforce them. Thank you for taking these most vital and concerned responses today in lieu of the methane that is constantly affecting our climate. Thank you for taking my comments.
Melissa Weitz 06:31:29	Thank you for your comments. Any questions from the panelists? Again, if you would like to provide comments, please let us know through the chat or through raising your hand with the * nine feature.
Kellie DuBay 06:32:06	There are a couple other speakers that are slated to schedule at a later time. If we have reached out to you in the chat and you're interested in speaking now, feel free to let us know in the chat or by raising your hand. And as Melissa said, even if you're not registered to speak and you'd like to share a public comment, you can do that now too and let us know in the chat. Melissa, if you would like, we can move to Speaker Group 13 and begin calling names from that list. Or you can choose to take a pause until 4:40.
Melissa Weitz 06:33:03	I think we can move to Speaker Group 13. But we'll be sure to pause for anyone that arrived late from previous groups. So, we're now displaying the list of speakers that have signed up for Speaker Group 13. So we are a bit early, but we will start running through the list to see if anyone wants to speak early. A number of these participants have already spoken. The first speaker on the list for this session is Livia Haines. Livia, if you're online and available, could you send us a note in the chat or press * nine, please. Thank you.

T 5 5	T., ., .
Kellie DuBay 06:34:24	I don't see a hand.
Melissa Weitz	The next speaker on our list that hasn't spoken yet is Glenda
06:34:28	Thompson. Glenda, if you're available, can you please let us
00.01.20	know? Thank you.
Kellie DuBay	Again, I'm not seeing a hand or a message.
06:34:50	Again, fill flot seeing a fland of a filessage.
Melissa Weitz	Stacey has already spoken. Lynn Godfrey, are you if you're
06:34:54	available to speak earlier than scheduled, could you please
00.34.34	
	send us a message or press * nine on your phone? Thank
Kallia DuBay	you.
Kellie DuBay	I'm not seeing a hand go up. We may have somebody from a
06:35:42	later time who would be ready to speak now.
Melissa Weitz	Okay. It looks like Edward Barta, if you're available to speak
06:35:51	now, please let us know and we can give you access. Thank
	you.
Kellie DuBay	It might take a moment for Edward to get his panelist invite.
06:36:37	
Kellie DuBay	Edward, if you're seeing an invite to be a panelist, you'll need
06:37:42	to accept it.
Melissa Weitz	It looks like Edward joined. So whenever you're ready you
06:37:49	can unmute yourself. If you'd like, you can also turn your
	camera on. Thank you.
Melissa Weitz	It looks like he may have had a connection issue. He was on
06:38:21	and then dropped off. Would you mind resending the invite.
Edward Barta	I'm still trying to find that. Where is it located?
06:38:28	, ,
Kellie DuBay	You're with us. Whenever you're ready Edward, feel free to
06:38:31	begin.
Edward Barta	All right, great. Thank you. Thank you for the time for allowing
06:38:39	all of this public testimony. We really appreciate it. I'm
	representing Northern Plains Resource Council and for a
	long time Northern Plains has been working to ensure that
	the voice of individual Montanans can be heard and that
	every day people will always be available to make a
	difference in how we treat our land, water, and climate. The
	Methane Emissions Reduction Program's Waste Emissions
	Charge, which has been mandated by Congress and the
	Inflation Reduction Act, is a commonsense bill that will hold
	the largest oil and gas polluters accountable for excessive
	climate pollution. We are concerned about the number of
	abandoned oil and gas wells here in Montana. Some of these wells have been abandoned for so long they cannot be
	traced. We are concerned because these abandoned oil and
	gas injection wells are some of them are leaking methane
	and for years we have seen oil companies walk away from oil
	wells that are no longer producing, leading us to plug the
	wells and remove any left behind equipment. Now we have a
	Montana monopoly utility company, Northwest Energy, that is
	building 175 megawatt methane fired gas plant within feet of

	our iconic Yellowstone River. The construction that is planned has been contentious. At one point the judge stopped construction due to incomplete permitting and in response, Northwestern turned to our sympathetic legislature who passed an under the wire law to eliminate any consideration of climate impact for permitting in Montana. Methane pollution from oil and gas development is released alongside other dangerous pollutants such as smog causing volatile organic compounds, VOCs which can worsen asthma, cardiovascular disease, and respiratory diseases as well as toxic air pollutants such as benzene, which is also known to cause cancer. There must be enforceable rules and standards that force these operators to ban methane leakage and unnecessary flaring. Failure to do so must have
	significant and serious consequences. Members of our communities have experienced the bark and cough or even passed out in their front yard from this issue. So we urge you to finalize this rule quickly and it is our obligation to protect the communities and increase climate security by holding oil and gas producers accountable now. Thank you.
Melissa Weitz 06:41:21	Thank you for your comments. Any questions from the panelists? I believe Andrew Bartnick is next up. Andrew, I think you have been sent the link. Whenever you're ready to go, please unmute yourself and turn on your camera if you would like to. Thank you.
Andrew Bartnick 06:41:57	Hi, can you hear me okay?
Melissa Weitz 06:42:04	Yes, we can.
Andrew Bartnick 06:42:06	Awesome. Thank you. Hi, so first of all, thank you all for the opportunity to provide some comments. My name is Andrew Bartnick, I'm a policy science advisor at Bridger Photonics. At Bridger Photonics, we simplify methane emissions production for the oil and gas industry by providing operators with actionable gas mapping LIDAR data. Gas mapping LIDAR technology uses scanning lasers on manned aircraft to map out methane emissions. Our data is used by oil and gas operators to identify and mitigate emissions throughout the U.S. and Canada. So Bridger's first comment relates to the anticipated exemption for facilities compliant with both quality and the state implementation plans that will be based on the model rule NSPS subpart OOOOc. The Waste Emission Charge proposal states that any deviations from these performance standards would cause Waste Emission Charge applicable facility to no longer be exempt from the charge. This creates a clear disincentive for operators to use better technology to monitor for emissions because more detections would result in more deviations, directly causing a waste emissions charge when emissions thresholds are exceeded. To provide a specific example, despite best efforts, it is

Melissa Weitz	extremely likely that at least a small number of emissions from covered and closed vent systems will continue to occur at both NSPS subpart OOOOb and NSPS subpart OOOOc affected or designated facilities and the better performing technologies will identify more of these emission violations. It's a massive problem that detecting a single one of these emissions at a single site would mean the entire collection of sites of a Waste Emissions Charge applicable facility will no longer be exempt from the charge. Therefore, we urge the EPA to the provide explicit compliance pathways for deviation to both NSPS subpart OOOOb and NSPS subpart OOOOc that allow operators to remain exempt from the waste emission charge as long as the majority of sites do not have performance deviations in a reporting year. As another important point of comment, many stakeholders, including Bridger, expected the waste emission charge proposal to provide a pathway for operators to use comprehensive measurement data to demonstrate their methane emissions reductions. We expect it was also Congress's intent for the EPA to provide operators with this type of protocol for reporting emissions. We therefore urge the EPA to provide a pathway to use comprehensive measurement data to demonstrate methane emissions for the Waste Emissions Charge. Thank you very much.
06:44:36	panelists?
Kellie DuBay 06:44:48	At this time Melissa, we don't have any other speakers from this group and we haven't had anybody volunteer yet to move up a spot. So, just wanted to give you that notification.
Melissa Weitz 06:45:04	Okay. Thank you. As reminder, if anyone would like to provide comments either who has not registered yet or has a later speaking slot or had an earlier speaking slot but couldn't make that one, please reach out to us through the chat feature or by pressing * nine on the phone.
Kellie DuBay 06:45:36	Would you like to move to our Speaker Group 14 list?
Melissa Weitz 06:45:46	Yes.
Kellie DuBay	I believe we do have one speaker with us but if you would
06:45:57	like to start at the top to see if we have anyone on the phone.
Melissa Weitz 06:46:06	Okay. Maybe I'll run through this list and go back to the early one in case anyone joined us later. So for the first speaker for Group 14, we have Matt Holmes. Matt, are you available? If so, could you please send us a message in the chat or press * nine on the phone.
Kellie DuBay 06:46:50	I don't see a hand going up.
Melissa Weitz 06:46:54	The next speaker we have listed for Group 14 who hasn't spoken yet is Laura Dyke. If you're available early, and would

like to give your comments now, please reach out through the
chat or press * nine on your phone. Good evening.
<u> </u>
Hi, Laura.
My name is Laura Dyke and I serve as the VP of compliance and regulatory for Miller Energy Company. We're a small business that produces crude oil from marginal wells in Michigan. Our mission is to develop energy and empower people. We've heard a lot of individuals today speak regarding their support of the EPA regulation under the premise of a tax being a commonsense approach to reduce methane emissions from the oil industry. Unfortunately, if you dig deeper into the regulatory tax, you will find out that it's not that simple. Today I'd like to present two main concerns. A timing disparity and the unintended impact to small business producers. First, there is a disconnect between the timing of the waste emission charge and the interrelated methane regulations under the greenhouse gas reporting (subpart W) and the New Source Performance Standards OOOO. As we sit here on February 12, we are already 43 days into a taxable period. Yet many small producers do not know if they will be required to participate in the 2024 Greenhouse Gas Reporting Program and cannot estimate their taxable methane emissions until the Congress mandated revision to subpart W is finalized. Additionally, Congress intended to have an exemption in place for good actors and compliance with NSPS subpart OOOO. However, this exemption will not be attainable for responsible producers for at least 3-5 years when all state, tribal, and EPA plans are in place. Let's unpack that a little bit. Subpart W provides the equation to determine how much methane a producer is deemed to release. These taxing metrics do not align with how industry measures output and further dilutes the accuracy by using a part count versus actual emissions. When Congress set the EPA's direction for the Waste Emissions Charge, it required the EPA to revemp Subpart W to use empirical data, but we have yet to see that. We urge the EPA to remember Congress's directive and stay the Waste Emissions Charge until both the Subpart W calculations and the NSPS subpart OOOO regulations are

	intensity calculations, so that aggregations of large amounts of disparate wells and gathering lines do not lead to charging a fee on marginal facilities that Congress intended to exempt or facilities that have minimal actual emissions. Also, many small producers are living with the uncertainty of what impact the new subpart W calculations will have on their businesses. If brought into greenhouse gas reporting, small businesses face a minimum of \$900,000 annual tax, and this is not a small expense to cover. Small businesses need to be able to assess well economics, properly budget for upcoming expenses, and have time to react to large cost variances. Additionally, as primarily a crude oil producer, we produce very little associated gas. The majority of the gas we produce is recycled and used to operate our field equipment. Due to the extremely low gas volumes, we do not have a robust gas meter program to substantiate what small volumes we emit. This is a concern for operators like us that may be subjected to intense auditing requirements by the EPA despite Congress's intent to shelter small businesses. We urge the EPA to work with industry to understand the impacts of methane regulations as applied to small business, marginal well producers, and to create solid boundaries that exclude
	small businesses.
Melissa Weitz 06:51:27	Thank you for your comments. Any questions from our panelists? I think the next person on our list who has not spoken yet is Joan Entwistle. Is Joan online? If so, would you please press * nine or send us a note in the chat. Thank you.
Kellie DuBay 06:52:18	Melissa, I'm not seeing a hand go up. But we do have a volunteer from one of our later speaking slots, willing to speak now, Michael Surrusco.
Melissa Weitz 06:52:31	Thank you. Michael, so you'll be sent the link to join as a panelist. When you're ready, you can unmute yourself and turn on your camera if you like and provide us with your comments. Thank you.
Michael Surrusco 06:52:54	Good evening members of the EPA and the fellow stakeholders. I'm Mike Surrusco, director of campaigns for the Taxpayers for Common Sense Organization, a nonpartisan budget watchdog established in 1995 committed to responsible government spending and ensuring taxpayer dollars are used efficiently. For over a decade we focused on methane waste advocating for responsible energy resource management to protect the interest of American taxpayers. We appreciate the EPA's initiative in organizing this public hearing. The Waste Emissions Charge under the Methane Emissions Reduction Program and the Inflation Reduction Act marks a crucial step for taxpayer interest. An effectively implemented emissions charge could help reduce methane waste, mitigate climate liabilities, and safeguard American taxpayers. The financial burden of climate change falls heavily on taxpayers. Methane, with the global warming

potential vastly exceeding carbon dioxide in the short term. significantly amplifies the cost and taxpayer burdens of climate change. Our recent study revealed that from 2018-2022, taxpayers annually sheltered an average of 62 billion dollars in federal climate change mitigation costs. A 35 percent increase from the preceding five years. Limiting methane emissions is, therefore, crucial in protecting taxpayers from escalating costs. We are pleased the Administration is addressing methane waste on many fronts. This proposed rule is a key component of the Methane Emissions Reduction Program intersecting with various proposed rules at the EPA. We're encouraged that adherence to the EPA's New Source Performance Standards and emissions guidelines could exempt facilities from this charge, incentivizing early compliance with methane regulations. We are also encouraged that the proposed Waste Emissions Charge reflects the proposed changes to the GHG reporting rule. Utilizing precise and comprehensive data is essential to the success of this program. The Waste Emissions Charge encompasses a range of operations in petroleum and natural gas sectors. It's vital that the rule addresses the complexity of these multifaceted facilities and the industry's varied activities. We recommend that the EPA mandate detailed reporting from regulated parties and ensure this information is publicly available. Transparency is essential for public trust and industry accountability. Vigilant oversight by the EPA is necessary to validate reported data. While we understand the rationale behind the program's exemptions, there must be stringent monitoring to prevent misuse and maintain the program's credibility. We support the EPA's requirement for exhaustive information from entities seeking exemptions. Additionally, we advocate for a balanced approach in granting exemptions to preserve environmental standards and taxpaver interests. TCS is also concerned with natural gas flaring, which not only carries environmental liabilities, but also wastes valuable gas resources. We propose an additional criterion for the permitting delay exemption, mandating entities to demonstrate that flaring is a last resort after exploring other options, like beneficial use and gas reinjection. We believe a strong final rule will not overly burden industry. The proposed rule will apply to a limited number of large facilities and a limited quantity of emissions. Additionally, there are a variety of cost-effective and successful technologies already implemented across the industry that can help operators avoid the fee. As representatives of taxpayers' interest, we stress the importance of fair and effective implementation of the Waste Emissions Charge. We trust the EPA will consider our insights to refine this rule, benefiting both our environment and fiscal well-being. We look forward to

	presenting further details in our written submission. Thank
Melissa Weitz 06:56:39	you. Thank you for your comments. Any questions from the panelists? So we are still looking for volunteers for speakers to speak ahead of schedule because we are running quite ahead of schedule, or if we have missed anyone from the earlier sessions, please let us know. Again, you can send a note into the chat or press * nine on the phone, thank you.
Kellie DuBay 06:57:21	For those of you that we have noticed are scheduled to speak later and we notice you're here, we have sent some messages, so please check your chats. We may have tapped you on the shoulder, virtually speaking. Melissa, are you interested in moving to Speaker Group 15, and we can always loop back around? Or the other option is to take a pause if you're interested in doing that.
Melissa Weitz 06:58:30	We can move to Speaker Group 15. We have seen in the chat there are other speakers planning to join but can't join later, so of course we will go back and make sure we'll still be on and make sure that everyone gets a chance to speak. But yes, we can move to Speaker Group 15 now. I'm going to start going through this list since we are running about an hour early. Sandy Bahr is the first person listed who has not spoken yet. Sandy, if you are available, can you send us a note in the chat or raise your hand by pressing * nine on your phone?
Kellie DuBay 06:59:29	I'm not seeing a hand go up, Melissa.
Melissa Weitz 06:59:35	Caroline spoke earlier. Is TJ Conway available? We already know he is joining later. Next speaker is Athena Christodoulou. Athena, if you're online and available, could you send us a note in the chat or press * nine on the phone?
Kellie DuBay 07:00:20	I don't see a hand going up.
Melissa Weitz 07: 00:28	Next up is Kelsey Krepps. Kelsey, if you're available, can you let us know please? Thank you.
Kellie DuBay 07:00:52	Again, I don't see a hand.
Melissa Weitz 07: 00:53 Kellie DuBay	Next speaker is Amy Kelly. Amy, if you're available, please send us a note in the chat or press * nine on the phone. I don't see a hand.
07:01:18	
Melissa Weitz 07:01:22	Tom Pike. If Tom Pike is online and available to speak, please let us know, thank you. We are doing a panelist change out so thank you Jameel for joining as a panelist for the first half of this session. I'll introduce Erin McDuffie who will be a panelist for the next half of this session. Thank you, Erin. A reminder that we are quite a bit ahead of schedule, and we invite anyone who is scheduled to provide their comments later, if you would like to speak now you can send us a message, or if you have not registered but would like to

Kellie DuBay	provide comments, you can send a message. If we have skipped over you in some of the earlier time slots, and you're online now and able to provide comments, please let us know either through the chat or by pressing * nine on your phone. I'm not seeing any other volunteers who are interested, but
07:03:37	again, there are a few folks that are here early that are slated to speak in some later Speaker Groups that if you're interested in speaking now, we would welcome your public comment now. You can raise your digital hand or let us know that you're interested in speaking by putting your name into the chat, or if you didn't plan on speaking but would like to share some thoughts, feel free to let us know.
Melissa Weitz 07:04:34	Since we have no speakers lined up for the next bit, we're going to take a break until 5:20. We will still be monitoring the chat, so if you would like to sign up to speak at 5:20, please send us a message and we'll resume then. Thank you.
Melissa Weitz 07:05:02	Thank you everyone for joining our public hearing on the Waste Emissions Charge. We just returned from a short recess, and we're going to start with speakers from Speaker Group 14, which is on the next slide. A number of these speakers have already presented their comments to us, but we will go through this list of speakers. I'll also note that anyone who has not registered yet and would like to speak, or is scheduled to speak later, or we missed earlier, please send us a note in the chat or press * nine if you're on the phone and would like to provide us with comments. So starting with Speaker Group 14. First speaker up is Matt Holmes. Matt, if you're available, can you please press * nine?
Kellie DuBay 07:06:16	Melissa, I'm not seeing a hand go up.
Melissa Weitz 07:06:19	Okay. Thank you. he next speaker in this group that has not spoken yet is Joan Entwistle. Joan, if you're available, can you please press * nine on your phone or provide us with a note in the chat?
Kellie DuBay 07:06:48	Melissa, I'm not seeing a hand go up. However, I'm seeing a speaker from a previous Speaker Group who is with us and is ready to speak now, Lynn Godfrey.
Melissa Weitz 07:06:59	Perfect. Thank you, so Lynn Godfrey will be our next speaker. Lynn, when you receive the link to become a panelist and join, please unmute yourself, turn on your camera if you'd like to, and provide your comments. Thank you.
Lynn Godfrey 07:07:34	Thank you. Let me I wrote something so I wouldn't forget it, so let me get that so I can look at it. Thank you. My name is Lynn Godfrey. Can you hear me?
Melissa Weitz 07:07:46	Yes, thank you.
Lynn Godfrey 07:07:48	Great. My name is Lynn Godfrey, and I am the Sierra Club Virginia Chapter's just transition program manager and also

their pipeline organizer. And I would like to thank you for the opportunity to comment and testify today to support the EPA's effort to propose the Methane Emission Reduction Program's Waste Emission Charge proposal. Reducing methane pollution is the fastest and most effective way to immediately slow our current rate of global warming, and oil and gas, as you know and has been stated before, oil and gas companies are the largest industrial source of methane. Virginia has two major fracked gas pipelines in development with an estimated increase in greenhouse gasses that would harm the environment. That's the Mountain Valley Pipeline and the Virginia Reliability Project, and now Transco has made a very bold move to develop another mega tri-state pipeline referred to as the Southeast Supply Enhancement Project. And it's already been determined that even with just one of these projects, the Mountain Valley Project if it [inaudible] as planned, experts said it would emit over 89 million metric tons of greenhouse gas pollution annually. And that is research that was done by the League of Conservation Voters here in Richmond. So, we're grateful for this proposal to hold those folks and hold those industries that are responsible for the problem to hold them accountable, hold them accountable to climate crisis and the things that we're going through now and hold them accountable to environmental justice communities that are disproportionately and cumulatively disadvantaged from the operations of fossil fuel fracked gas operations. So I have been holding those most responsible for the harm that they are causing. That's the fair thing to do, and that's what we try to do here in Virginia with the cap-and-trade program, RGGI, that Republicans are trying to get rid of. But the Methane Emissions Reduction Program also includes over a billion dollars in funding to 14 states to go ahead and start that process of mitigating -- I mean, of coming up with programs to make sure that the emissions of greenhouse gases is eliminated in the state. And Virginia was one of those states and the rightfully so because we have our share of greenhouse gas emissions as well as environmental pollution that disproportionately and cumulatively impacts communities in Virginia that are primarily communities of color. So that is one reason why we definitely support that. And working and advocating for healthy communities and keeping environmental pollution out of communities, that accumulative disadvantage is very important because these communities such as Petersburg, Virginia, which is noted by researchers, public health researchers, is the most unhealthy city in the Commonwealth of Virginia. And it has been cumulatively disadvantaged where gas operations as well as with legacy industries that has polluted that community and caused them disproportionately to have life expectancy shortages, asthma rates. Right here in Virginia, also we have

	communities that are disproportionately impacted by environmental pollution from compressor stations such as in the Norfolk Naval Shipyard here in Portsmouth, Virginia. We have Old Dominion University researchers that found those communities that flood in those neighborhoods that are already impacted by environmental pollution experience pediatric asthma rates five to six times higher than what the region is. That is saying a lot because Virginia has one of the highest asthma rates, of pediatric
Kellie DuBay	Lynn, our time is up. I'm sorry to interrupt. Our four minutes is
07:12:09	up. Thank you so much.
Lynn Godfrey 07:12:15	Okay. Well thank you. I think I got most of my points.
Melissa Weitz 07:12:17	Please submit your comments, your written comments, as well. Thank you very much. I think we are going to move on to Speaker Group number 15 now, and we'll go back later and we can see if any others have joined us from the Speaker Group that weren't able to join earlier. So first up on the Speaker Group is Sandy Bahr. Sandy, if you're available, please send us a note in the chat or press * nine on your phone. Thank you.
Kellie DuBay 07:13:13	I'm not seeing a hand go up, Melissa.
Melissa Weitz 07:13:17	Thank you. Caroline already spoke today, so TJ Conway if you're available, please send us a message or press * nine on your phone. Thank you.
Kellie DuBay 07:13:34	We had heard that TJ would be joining us after 5:30.
Melissa Weitz 07:13:39	That's right, yes. So let's see. Athena Christodoulou. Athena, if you're available, please let us know by sending us a message or pressing * nine on your phone.
Kellie DuBay 07:14:04	Not seeing a hand go up at this time.
Melissa Weitz 07:14:08	Kelsey Krepps is the next speaker listed. Kelsey, please let us know if you're available by pressing * nine on your phone or sending a message. Thank you.
Kellie DuBay 07:14:29	No indication that the speaker is here.
Melissa Weitz 07:14:34	The next speaker is Amy Kelly. Amy, if you're available, can you let us know by sending us a message or pressing * nine on your phone?
Kellie DuBay 07:14:53	I'm not seeing a hand go up.
Melissa Weitz 07:14:57	Tom Pike is the next speaker. Tom, if you're available, could you please either press * nine on your phone or send us a message in the Zoom chat? Thank you.
Kellie DuBay 07:15:22	We do see Tom's name in the list of participants. So I believe yes, he's a panelist too.
Tom Pike 07:15:29	All right, all set?

Melissa Weitz	Great. Thank you.
07:15:32	Great mank year
	One second, Computer is loading. While it loads what I was
Tom Pike 07:15:36	One second. Computer is loading. While it loads what I was preparing to say, my name is Tom Pike. I'm an environmental policy advocate with Protect PT, which is an environmental organization located in southwestern Pennsylvania. I live in an industry-designated sacrifice zone. So I was born and raised in a town called Murrysville. In the 1880s, Murrysville was the site of the first commercial scale natural gas extraction well in history, and about three years after it was drilled, the Haymaker well caught fire and exploded and couldn't be extinguished for about six months. It was one of the worst environmental disasters to ever strike the region. The flames could be seen from Pittsburgh, which is about 20 miles away. Now we don't get to choose our past. None of us can stop the Haymaker well from being drilled, but over and over again in the 140 years since the Haymaker well blew out, people in power have chosen to repeat the same mistake. One explosion and fire should have filled the lawmakers and regulators of our region with a deep shame and a drive to make sure it never happened again. Yet here we are with more wells than ever, hotter skies than ever, and deadlier storms than ever. Even the Inflation Reduction Act, which is the largest and most effective climate bill in American history, is almost entirely comprised of carrots with very few sticks. This proposed rule would be one of the first serious sticks wielded by the EPA to the protect people, that would force the oil and gas industries to stop ignoring some of the most significant consequences of their rapacious greed. Do not let these industries water down this rule or get away with failing to comply with it. You must fight them on behalf of us because it's time now for us to
Kellie DuBay 07:17:38	I believe Tom must have frozen. Can we stop the timer? He was at 2:09. We'll give him a minute to see if he can come back. Tom, are you able to hear us? I think at this point, I don't know Melissa if you want to move on. I believe TJ Conway is available. He had about two minutes left, so if he is able to rejoin, we can give him the two minutes a little under a minute and some change he had available. But I think TJ Conway is available.
Melissa Weitz 07:18:33	Yes, that sounds great. TJ, if you're available to speak now, please accept the panelist link that was sent to you, and when you're ready, unmute yourself. And you can turn on your camera also if you wish and provide your comments. Thank you.
TJ Conway 07:18:55	Can you see me and hear me?
Melissa Weitz 07:18:59	Yes, thank you.

TJ Conway 07:19:01

Great. Thank you. My name is TJ Conway. I'm a principal in RMI's Climate Intelligence Program working to reduce methane emissions from the oil and gas sector. Thank you for the opportunity to provide comment on the Waste Emissions Charge through this hearing today. The Waste Emissions Charge is a commonsense measure that can substantially reduce harmful and wasteful methane pollution in this critical decade for climate action. The WEC program can accelerate implementation of EPA's recently finalized section 111 standards and build emissions transparency and accountability across U.S. oil and gas operations. RMI research shows methane leakage as low as 0.2 percent can put gas's net climate impact on par with coal's. The Waste Emissions Charge sets a vital and achievable threshold to reduce leakage and help move the industry closer to zero methane emissions. As many have highlighted, methane abatement can immediately slow the rate of global warming while delivering powerful benefits for local communities, improving air quality, protecting public health, and creating new job opportunities in methane monitoring and mitigation. There are cost-effective pathways for operators to lower their methane intensity and improve operational efficiencies. Operators that adopt these widely available low-cost mitigation measures will not only work towards full implementation of EPA's nationally applicable regulations but also reduce or entirely eliminate their charge obligation. In addition, EPA's Methane Emissions Reduction Program provides more than 1.5 billion dollars in funding to support methane detection and mitigation. We support EPA's WEC proposal and encourage the Agency to move swiftly to finalize a rule that one, establishes transparent calculations and methodologies for determining an owner or operator's net emissions. Two, ensures EPA's standards are in effect in all states before regulatory exemptions can apply as directed by statute. Three, includes clear guidelines and verification protocols for facilities to demonstrate eligibility for any exemption from a charge due to well plugging, compliance with EPA standards, or unreasonable permitting delays. Finally, we'd like to note that to support fair and effective implementation of the WEC program, EPA must also ensure the accuracy of operator-reported emissions under subpart W. EPA should further integrate top-down data, including basin, site, and equipment level measurements to improve the accuracy of reported emissions and support a robust reconciliation process that minimizes differences between reported and observed emissions. On Friday, EPA and DOE issued a notice of intent through the Methane Emissions Reduction Program for up to one billion dollars to support methane mitigation. The third area of interest for regional methane monitoring consortia would provide critical data to inform timely methane mitigation and improve the accuracy of

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	EPA's Greenhouse Gas Reporting Program and the associated Waste Emissions Charge. We recommend EPA and collaborating agencies allocate at least 200 million dollars of the available one billion dollars to this vital monitoring program. Thank you for your consideration.
Melissa Weitz	Thank you for your comments. Any questions from the
07:22:32	panelists? Thank you, and we will pick up again with Tom Pike if Tom is available. It looks like your computer crashed about two minutes into your comments, so you would have about two minutes remaining for the rest of your comments.
Tom Pike 07:22:58	Sounds good. I'm not totally sure where it stopped, where you stopped being able to hear me, so I'll pick up from three years after the Haymaker well was drilled in my hometown, it caught fire and burned. It was one of the worst manmade disasters to ever strike southwestern Pennsylvania. The flames couldn't be put out, and the well burned for months. The flames rose so high into the sky that the fire could be seen from Pittsburgh, which is 20 miles away. So, we don't get to choose our past. None of us can stop it from being drilled, but we have made the same mistakes over and over again in the 140 years since the well blew out. And you would have thought that one explosion and one fire, that would have filled the lawmakers and regulators with deep shame and desire to make sure it never happened again. But here we have more wells than ever, hotter skies than ever, and deadlier storms than ever. The Inflation Reduction Act, which is the largest and most effective climate bill in American history, even that is almost entirely comprised of carrots with very few sticks. This proposed rule would be one of the first serious sticks wielded by EPA to protect people. It would force the oil and gas industries to stop ignoring some of the most significant consequences of their greed. I'm asking EPA not to let these industries water down this rule or get away with failing to comply with it. You must fight them on behalf of us because it's time to build an energy system that won't shoot flames into the sky that are visible from 20 miles away. The Murrysville gas well is still revered in my hometown that it is emblazoned on that city's logo. That even in the romanticized image on the city seal, it's depicted in flames. We don't get to choose our past, but I would hope we would
Molingo Weiter	reject that future. Protect PT urges the strongest possible version of this rule to be adopted. Thank you for your time.
Melissa Weitz 07:24:47	Thank you. Any questions from the panelists? Thank you. I believe our next speaker is Ruth Striegel. Ruth, if you're available to speak, please accept the link to become a panelist, and when you're ready, unmute yourself and you can turn on your camera as well and provide comments. Thank you.
Ruth Striegel	Can you hear me?
07:25:32	,

Melissa Weitz	Yes, thank you.
	, ,
07:25:36 Ruth Striegel 07:25:38	Okay. Here we go. Hi. Thank you for the opportunity to speak. My name is Ruth Striegel. I'm a member of Interfaith Power and Light, and I live in Albuquerque, New Mexico. I'm commenting as a private citizen concerned with the future of our planet and with the wellbeing of the people of my state. I've spent time in the Permian Basin in southeast New Mexico, driving through oil fields where the air is so polluted with methane and related gasses that everyone I was with became nauseous and/or got a headache. It was very obvious that the wells and pipelines around us were leaking large amounts of gas. I have a really hard time managing anyone living or working in those fields without suffering all kinds of adverse health impacts. This pollution disproportionately impacts People of Color and low-income communities. In northwest New Mexico, many of our Navajo neighbors find themselves surrounded by gas wells. In southeastern New Mexico, many Latinx immigrants are forced to live near oil wells and infrastructure, since the housing stock there is less expensive. This has real health impacts with people developing thyroid and other cancers, asthma, and other lung conditions. All of which can shorten lives or simply degrade quality of life. I strongly support efforts to get oil and gas producers to capture methane and see the Waste Emissions Charge as a good tool to move producers toward zero emissions. Rather than treat methane as a waste product, they can capture it and sell it. The technology to monitor and contain the gasses is already available and in use. The EPA has created a commonsense mechanism that is not overly burdensome on industry and will actually create well-paying, long-term employment. Methane is responsible for 25 percent of the climate change we are experiencing currently, and methane pollution is rapidly growing around the world at the very time we desperately need to curtail it. The window of opportunity to keep global warming at 1.5 degrees Celsius is closing fast, and reducing methane pollution i
	Please move forward with the Waste Emissions Charge and all the elements of the Methane Emissions Reduction Program. Thank you.
Melissa Weitz 07:28:23	Thank you for your comments. Any questions from our panelists? Thank you. Let's see, if anyone else is interested in volunteering to speak earlier or in this time slot, please send us a message in the chat or press * nine.
Kellie DuBay 07:29:19	I'm not seeing any hands go up, and we haven't seen anybody who is able to speak ahead of schedule quite yet. So Melissa, I guess it's up to you if you want to take a recess until you're ready for the Chair and panelists to switch? Do you want to break until 5:55?

07:29:48 receive your invitation to become that, and then when you're recan turn on your camera and thank you, and good evening thank you.	have shared today, reducing ffective way to immediately slow rming as we push for fossil fuel anies are the largest industrial Methane Emissions Reduction
Melissa Weitz 07:29:48 So Rachel Carle, you'll be the receive your invitation to become that, and then when you're recan turn on your camera and Thank you, and good evening Carle. I am a policy advisor a organization fighting global in injustice. As other speakers in methane is a fast and cost-ed our current rate of global war.	come a panelist, please accept eady, unmute yourself. And you deprovide comments. Thank you. Ig, everyone. My name is Rachel at Oxfam America, which is an equality to end poverty and have shared today, reducing ffective way to immediately slow rming as we push for fossil fuel anies are the largest industrial Methane Emissions Reduction
Rachel Carle 07:30:10 Thank you, and good evening Carle. I am a policy advisor a organization fighting global ir injustice. As other speakers I methane is a fast and cost-er our current rate of global war	g, everyone. My name is Rachel at Oxfam America, which is an nequality to end poverty and have shared today, reducing ffective way to immediately slow rming as we push for fossil fuel anies are the largest industrial Methane Emissions Reduction
source of methane, and the I Program's Waste Emissions Reduction Act is a smart feat oil and gas polluters account pollution. Leading companies limit emissions below the thresubjected to the fee, that is if The Waste Emissions Charg operators to reduce their emireplacing equipment. Frontlir the burden of this pollution for rightly places the burden to million people in the United Sactive oil and gas production air polluted with methane and alongside it. This pollution is early deaths, asthma, and redisproportionately impacting including Black, Indigenous, living in poverty in the U.S. Thealth impacts, including bre issues, and the health impact burden on unpaid and under disproportionately women. We safeguards in place, we can communities and those living the dangerous oil and gas pot the health and safety of work closest to extraction. The U.S. global climate action.	t that will hold the nation's largest table for excessive climate is who have already pledged to esholds would avoid being if those commitments are met. If it is a critical incentive for issions by minimizing leaks and the communities have shouldered or years, and this waste charge change on companies. Over 10 states reside within half a mile of a operations. Forced to breathe did the toxic chemicals emitted associated with thousands of espiratory issues, and cancer marginalized communities, and People of Color and people his pollution also has gendered east cancer and maternal health east on whole communities place a spaid care workers who are with critical and enforceable protect environmental justice gon the frontlines by ensuring ollution will no longer jeopardize kers and the communities living
methane emissions by 30 pe Emissions Charge, if swiftly a help make good on the U.S.'s countries like the U.S., who h	

	footoot The import of the Wests Emissions Charge sees for
	fastest. The impact of the Waste Emissions Charge goes far beyond the U.S. This has the potential to catalyze ambitious methane policy in other high-emitting countries. Every emissions reduction we make helps minimize the climate devastation faced by communities and poverty around the
	world. Thank you.
Melissa Weitz 07:33:33	Thank you. Any questions from the panelists? If not, we will move into a short break. Again, my name is Melissa Weitz, and I have been chairing this hearing session. I want to thank everyone who has shared their comments so far today on EPA's proposed action. At this time, we will take a short break. We'll resume at 6:00 PM Eastern time, and after the recess, the Hearing Chair and panelists for the next session will introduce themselves. Thank you.
Pye Russell 07:34:06	Hi everyone. Welcome back from the break. My name is Pye Russell, and I'm a special advisor for implementation in EPA's Office of Atmospheric Protection, and I'm now chairing this session of the Waste Emissions Charge for Petroleum and Natural Gas Systems virtual public hearing. I'd now like to ask our next group of EPA panelists to introduce themselves. Jen, I see you, starting with you please.
Jennifer Bohman	Thanks, Pye. Hello, I'm Jennifer Bohman. I'm program
07:34:31	analyst with the Climate Change Division. Thank you.
Melissa Weitz	Hello. I'm Melissa Weitz. I'm an environmental policy analyst
07:34:42	in the Climate Change Division in the Office of Atmospheric Programs. Thank you.
Pye Russell	Thanks, Jen and Melissa. So another reminder about
07:34:52	providing testimony. When I call on you to speak, you'll
	receive an invitation to become a panelist on Zoom. You'll then need to accept the panelist invitation when it pops up on your screen. You'll then have the ability to unmute your line and provide your comments. While you're providing testimony, you're also welcome to activate your camera by clicking on the start video icon. If you're joining by phone and you're up to speak, please press * nine to raise your hand and let us know that you're there. You'll then be able to hit * six to unmute and speak.
	Please state your name for the record. A four-minute timer will start when you state your name, and you'll have those four minutes to provide your comments. And if you are testifying by phone, the timekeeper will alert you when you have one minute remaining because you won't be able to see the timer on the screen. To be fair to everyone, again, we are going to be strictly enforcing the four-minute limit on everyone's oral comments. We're now going to start again going through the group, the different speakers who have
	pre-registered to give oral comments. We are going to do some catching up with certain people who were in previous groups, Speaker Groups. So to begin with, we are going to

	be starting sorry, let me pull this up. I think we will start with
	Athena Christodoulou.
Kellie DuBay	Actually Pye, Sandy is here. Speaker 112 if you want to start
07:36:41	there. Sorry about that.
Pye Russell	Okay. So Sandy Bahr if you're there.
07:36:48	Chay. So Sandy Bann in you're thore.
Sandy Bahr	All right, I am here. Can you hear me?
07:37:01	,
Pye Russell	Yes.
07:37:03	
Sandy Bahr 07:37:04	Okay. Thanks so much. Good afternoon, and thank you for the opportunity to speak on this important issue. My name is Sandy Bahr. I'm the director for Sierra Club's Grand Canyon Chapter, which is the Arizona Chapter. We support the Environmental Protection Agency's efforts to reduce methane pollution, including via the creation of a Waste Emissions Charge for oil and gas. As you know, methane is a powerful greenhouse gas, and because of that, reducing methane pollution is one of the fastest and really cost-effective ways to slow the warming of this planet. Methane is also the second biggest contributor to global warming, second only to carbon dioxide. And of course, oil and gas companies are the largest industrial source of methane, so it's essential that we do all we can to reduce methane emissions from these facilities. The Methane Emissions Reduction Program's Waste Emissions Charge is an important step coupled with the methane rule that was finalized last December. This charge will hold the biggest polluters in the country accountable for excessive pollution, and it will help them comply with the federal methane standards. The fee also incentivizes companies to take action now to reduce emissions. Some companies may already be retrofitting well sites with zero emissions equipment, and we need to see more of that. Methane pollution from oil and gas is often coupled with the release of other harmful pollutants, such as those that contribute to smog and contribute to worsening asthma and other respiratory diseases. Plus oil and gas operations include toxic air pollutants. Methane and these associated pollutants disproportionately and negatively affect communities of color including our neighbors in northwest New Mexico, as well as low-income communities. Please move forward expeditiously to reduce methane emissions by advancing this Waste Emissions Charge. It will benefit the climate and advance environmental justice in these communities most affected by methane and other pollutants. Thank you.
D D II	
Pye Russell 07:39:42	Thank you for your comments. If there are no clarifying questions from the EPA panelists, we'll move down to
Kallia DuDay	Athena, speaker 115.
Kellie DuBay	Athena you should be able to unmute.

07:40:08 Athena Christodoulou There we go, Just getting my technology to work, Anyways. 07:40:11 thank you members. My name is Athena Christodoulou. I want to let you know that as a teenager, I never rebelled. So why have I become a rebel as a grandmother? Good afternoon. My name is Athena Christodoulou, like I said. I'm an environmental energy and energy engineer. I look for solutions to the problems we humans have brought upon ourselves, especially toxic air pollution and the current climate crisis. As a retired Navy Commander, I raised my hand to support our Constitution, and I'm a Christian. All tell me to protect lives. People need clean air in order to live and thrive. Fossil fuel emissions account for 90 percent of air pollution. Methane pollution from oil and gas development is released alongside other dangerous pollutants, such as smog-causing VOCs. You know that -- you know they can worsen asthma, heart disease, and respiratory disease, and that doesn't even touch on the toxic air pollutants, such as benzene, a known carcinogenic. Do you want us to continue to breathe toxic air, causing premature deaths and any chance of a livable planet for my granddaughters and yours? The people need you, EPA, to use all the tools possible to reduce the waste emissions from the oil and gas industry as swiftly as possible to protect lives in states like mine, New Mexico, and our future. I'm well acquainted with the math and science of the current climate crises. If had addressed methane earlier, we would not have come as close to this cliff that we've come. Methane is very short-lived. Twelve years as opposed to 1,000 years of CO₂ in the atmospheric cycle. Its unabated emission is an explosion of greenhouse gas potential. Up to 200 times more potent in the short-term and then it's CO₂, and we wait 1,000 years. How many more Acapulcos, where a hurricane went from tropical storm to category five in less than 24 hours with no warning it would even go past category two? How many wildfires choking our lungs? How many dry wells from droughts or atmospheric rivers deluging the deserts? How many before we act in rebellion, I exclusively drive EVs, don't fly, and have electrified or solarized everything. If we are going to have a fighting chance to address climate change and save the human species, along with others, we must all go full speed ahead to reduce our fossil fuel emissions. Finally, collecting an annual Waste Emissions Charge on excess methane emissions from the oil and natural gas facilities points out the abusive financial advantage the oil and gas industry has used to keep the American people and our government beholden to their product, despite their own scientists warning of future climate problems. It's about time to charge them for sloppy and dangerous practices. In fact, it's time to declare an emergency, a climate emergency. Stop all direct subsidies to

	the industry, and begin reparations to humanity. In conclusion, don't drill for me, ExxonMobil. I'm a rebel with a cause. I'm against human extinction. Thank you.
Pye Russell 07:43:36	Thank you for your comments. If there are no questions, we will now I'll ask if there are if anyone from Speaker Group 15 who has not spoken but is calling in on the phone, could hit * nine to raise their hand if they would like to speak. So Kelsey Krepps or Amy Kelly. If either of you are on the phone, please hit * nine to raise your hand so we can see you and call on you.
Kellie DuBay 07:44:16	I'm not seeing any hands go up, Pye, so I think that's it for Speaker Group 15.
Pye Russell 07:44:22	Great, thanks, Kellie. So we can go to Speaker Group 16 please. I believe a lot of the people on this list from Speaker Group 16 also chose to speak early when we had time available in the some of the earlier Speaker Groups. So I think speaker 123, Norm, if you're there online, or if you are calling in, if you could hit * nine to raise your hand so we can see you and elevate you to a speaker please.
Kellie DuBay 07:45:16	I'm not seeing a hand go up, Pye, so if you want to move forward to Speaker Group 17?
Pye Russell 07:45:28	That sounds good. If we could go to Speaker Group 17 please. And we'll start at the top with Mirele Goldsmith. If you're on the phone and would still like to provide comments, or if you're online, we can promote you to a presenter and then you can unmute yourself.
Kellie DuBay 07:45:56	Mirele is here, so I think panelist status is being achieved.
Mirele Goldsmith 07:46:02	Here I am. Thank you very much for giving me this opportunity. I'm Mirele Goldsmith, co-chair of Jewish Earth Alliance, the national network of Jews advocating for solutions to climate change, and I live in Bethesda, Maryland. I'm here to express my support for EPA's proposed regulations to implement the Methane Emissions Reduction Program's Waste Emissions Charge. I'm sure that many speakers have already described why cutting methane pollution is absolutely essential to protect human health and to reverse the damage to climate systems which is harming all of life on this sacred planet. I would like to add some perspectives from my Jewish tradition that address the ethical responsibility that oil and gas producers hold for causing harm by releasing methane emissions. Jewish tradition holds that individuals are responsible for harm that they cause, whether it takes place on their own property or on public property. Basically, Jewish tradition teaches that there is no excuse for not anticipating and preventing harm. If negligence results in harm, then financial reparations must be paid. Regarding private property, the Bible specifies a homeowner must build a parapet on their own roof to protect against someone falling off. The principle elucidated from this

Pye Russell 07:48:42	simple example is that we must anticipate potential harm and act proactively to forestall it. The community can require action even if the danger exists on private property. As to public property, an individual who creates a dangerous condition on public property is held responsible if someone is harmed. The classic example in this case is if a person who digs a pit in an open area and fails to cover it. Very timely, isn't that? If a person or an animal falls into the pit, the digger of the pit is required to pay damages. The ethical principles that underline these laws must be applied in the case of methane emissions. If producers do not act ethically on their own, then it is upon government to represent the community at large in requiring that they eliminate harmful methane emissions. And where through negligence harm is caused by allowing emissions to take place, producers must be required to pay for the damage as in the case of the Waste Emissions Charge. I applaud EPA for taking steps to hold producers accountable for methane emissions and urge you to swiftly finalize strong regulations to implement the Waste Emissions Charge. Thank you. Thank you for your comments. If there are no questions, we heard from several people in this group who provided testimony earlier, so we are going to move to Alondra. If you're on, we will promote you to speaker, and then you will be able to unmute yourself. Thank you.
Alondra Morales Sanchez	Hello?
07:49:08	Tiono:
Pye Russell 07:49:10	Yes, we can hear you.
Alondra Morales Sanchez 07:49:16	Awesome. There I am. Sorry. I'm accepting everything, and I'm good to go. Hi, my name is Alondra Morales Sanchez, and I am the environmental justice coordinator with AANHPI for Equity. We are an organization that tackles a ton of issues but specifically environmental in my case, and we seek solidarity with all of our BIPOC communities. I'm here in support of the regulation. I see it as a way I see it as a hope, as a light of hope. I'm 25 years old, which means I have about 60 more years to live, and climate change is really scary. There is no denying the truth, and there is no denying that these big corporations, these oil and gas corporations, have contributed an exponential amount to what we are seeing now. And that will be held accountable in some way for what they have done. And I would love to see those regulations and what you're proposing be strong and be implemented into climate justice. Thank you.
Pye Russell 07:50:46	Thank you for your comments. If there are no questions from the EPA panelists, we will now move to Nile. You will be promoted to speaker, and you will be able to unmute
Nile Bunger	yourself. Are you able to hear me okay?
Talle Duriger	Ale you able to hear the oray:

07:51:10	
Pye Russell 07:51:12	Yes.
Nile Bunger 07:51:13	Okay. Awesome. Thank you very much for having this today. My name is Nile Bunger, and I'm the climate justice director for AZ AANHPI for Equity. That stands for Asian American and Hawaiian Pacific Islanders for Equity. But more importantly, I'm here because I'm a human being concerned about our environment, as well as the wellbeing of human lives. Methane is the second most abundant greenhouse gas after CO2, yet it's more than 28 times stronger than carbon dioxide when it comes to trapping heat in our atmosphere. Therefore, reducing methane is a quicker way to help slow down our ongoing temperature increase across the globe. Throughout the country, we see large numbers of Black, Indigenous, Latinx, and other marginalized communities, including in rural areas, living in conditions with close proximities to oil and gas operations, which in return enhances many health risks, such as increased asthma and various types of cancers. We are definitely in support of the EPA in terms of taking action for stronger restrictions on methane reduction and the demand for a harder push to hold these industries accountable for the sake of our communities and their health. BIPOC and other marginalized communities in these areas experience higher health concern risks and lack proper healthcare. Therefore again, we are in strong support of this. During the pandemic, we did see that there was compromised immune system and other respiratory concerns in individuals in these communities that posed higher risk and complications, so we do urge the EPA to act quickly on this matter for clean air. Thank you.
Pye Russell 07:52:55	Thank you for your comments. If there are no follow-up questions from EPA, what we we have gone through all of the Speaker Groups and everyone that had registered to provide oral comment during today's hearing. And thank you everyone who provided comments, and thank you everyone for being timely. We are ahead of schedule, so we still have availability and time for anyone who may have been on the list earlier in the day but was not able to join when we went through their name. So if there is anyone who had preregistered but has not yet been able to speak, again, please let us know. And if you're calling in, you can hit * nine to raise your hand. And also if there is anyone else who did not preregister but would now like to provide oral comment, again, you can do that by sending us a chat via Zoom, or if you're calling in, by pressing * nine to raise your hand.
Kellie DuBay 07:54:34	I'm not seeing a hand go up, and I don't see any comments.

D D "	
Pye Russell 07:54:40	Okay. Again, we still have a fair amount of time left, and because we're a little bit early, we would still like to keep the full amount of time open. So what we will plan to do is, we will hold maybe a couple of breaks, and so we'll pause now. And we'll pause from now until 7:00 PM Eastern time. And at that time, we'll come back online, and we will see if anyone else has joined that would like to provide comment and give them the opportunity to do so. And then if there is no one at that point, maybe we'll take another break until towards the end of the originally scheduled time when the hearing is scheduled to end, which is at 7:25 PM Eastern. So again, we'll take a break now until 7:00 PM Eastern, and we'll check back in, and then we'll take another break unless we have additional people that would like to provide comment. And then we'll provide another final opportunity just prior to 7:30 before we wrap things up. Again, please feel free to raise your hand. If you're calling in, hitting * nine, or send us a message in the
Due Duesell	chat if you have any questions. Thank you.
Pye Russell 07:56:19	Welcome back to the public hearing for the Waste Emissions Charge for Petroleum and Natural Gas Systems proposed rule. We are coming back from a short recess. Just to recap where we are, we have gone through the full list of all the pre-registered speakers who had signed up to provide comment on the proposed rule. Right now, we are opening up the floor to anyone else who may have joined that would like to provide comment, as well as there were a number of speakers who pre-registered from each session that we had throughout the day that were not there when we called on them initially. So we also welcome anyone who has who did pre-register but was not online or on the phone when we initially called their name to use this time available now to submit their oral comments if they are still interested in doing so. And again, please see the instructions on the screen for anyone who has not pre-registered but would like to provide comments to use this opportunity to provide comment now. You can use the email address to email meetings@erg.com or use the Zoom chat to send a message. And if you're calling in, you can hit * nine on your phone to raise your hand, so we'll see you and can then call on you. So we'll give it a couple of minutes, and we'll see if there are any additional people that would like to provide public comment. And if not, we will stay on the line and take another break but stay on the line and then open it up again shortly before the scheduled end of the hearing, just before 7:30 to open up the line one more time. Again, if anyone would like to use the opportunity now in this public hearing to provide public comment on the proposed rulemaking, please let us know.
Kellie DuBay	Pye, it doesn't appear we have anybody on the phone.
07:59:23	Everyone is joining us through regular Zoom, and I'm not

	seeing any hands going up and no requests in the chat at the moment.
Pye Russell 07:59:39	With that, we'll take another break until 7:25, and at 7:25, we will open it up one last time for any additional people who would like to provide feedback and comment on the proposed rule. Again, that can be people who pre-registered but were not available to provide oral comment when we initially called on them or anyone who did not pre-register but would like to use this opportunity to provide comment now. And then after that, we will close out the public hearing. So thank you, and again, we'll be back in 20 minutes.
Pye Russell 08:00:37	Hi, everyone. We are going to come back from our hearing recess. Before we wrap up for today, I wanted to give one more opportunity for anyone who may not have who may have pre-registered or was not on when we called on them earlier to come on the line or anyone else that had not pre-registered come on to the line and provide oral comment at this time. It doesn't look like we have anyone new on the line or on the phone since the last recess we took.
Kellie DuBay 08:01:28	I don't see any hands up, Pye.
Pye Russell 08:01:32	Thanks, Kellie. All right, well again, my name is Pye Russell, and I have been chairing this hearing session. At this time I want to thank my fellow chairs, fellow panelists, and everyone who offered testimony today, as well as everyone who took time out of their schedules to listen in to today's hearing on EPA's proposed rule for Waste Emissions Charge for Petroleum and Natural Gas Systems. A reminder to everyone that you can continue to submit written comments on this proposed rule through the rulemaking docket through March 11 of this year. Also wanted to note that EPA will be holding two technical outreach webinars to provide additional information on this proposed rule, and those will take place on February 20th at 2:00 PM and March 5th at 1:00 PM, both times Eastern. Information about these webinars and how to register is available on EPA's Methane Emissions Reduction Program website and will also be sent out via email following the conclusion of this hearing. Thank you everyone again for joining us, and this hearing session is now adjourned.