

February 13, 2023

Mr. Michael S. Regan  
Administrator  
U.S. Environmental Protection Agency  
Washington, DC 20460

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

Dear Mr. Regan,

As religious organizations, we have long worked to live out our mandate to steward God's creation and serve our neighbors near and far who are suffering from injustice and harm. A core component of our mission and ministries is the need to address climate change and promote human health.

Methane pollution, [80 times more potent](#) than carbon dioxide, is a prime driver of climate change and has an [outsized health impact](#) on communities of color and the most vulnerable, including children and pregnant mothers. It is therefore imperative that the Environmental Protection Agency (EPA) address methane pollution by putting in place a robust methane pollution standard for new and existing oil and gas operations. A strong standard can help protect communities, especially communities of color, which [disproportionately suffer](#) from climate change and air pollution.

The EPA's supplemental rule to regulate methane pollution standards from the oil and natural gas sector, the [largest industrial source of methane](#), is a welcome improvement but the rule does not go far enough. The draft rule includes regular inspection for methane leaks and replacement of outdated equipment. But the methane rule also must ensure that flaring is limited only to occasions necessary for safety or maintenance reasons. In addition, the rule should include provisions that ensure well operators capture any associated gas and that emission standards for storage tanks be strengthened. Importantly, the EPA must also ensure that communities can access data and technologies to reduce methane pollutants in our homes and workplaces, including clear guidelines for community participation and industry accountability in the Super Emitter Response Program.

Methane pollution is a threat to our communities and God's creation. Methane pollution harms air quality and contributes to [ozone smog formation, which exacerbates asthma](#), a disease felt all too keenly in communities of color. Reducing methane pollution is a justice issue and the EPA must pursue and finalize a robust methane pollution standard.

Sincerely,

Arizona Faith Network  
Climate Witness Project of the Christian Reformed Church in North America  
Coalition on the Environment and Jewish Life  
Creation Justice Ministries

Dayenu: A Jewish Call to Climate Action  
Franciscan Action Network  
GreenFaith  
Interfaith Power & Light  
Islamic Society of North America  
Lutherans Restoring Creation  
National Religious Partnership for the Environment  
Pennsylvania Council of Churches  
Sisters of Mercy of the Americas Justice Team  
The United Methodist Church – General Board of Church and Society  
Committee on Domestic Justice and Human Development, United State Conference of Catholic  
Bishops