



DATE: October 1, 2025

TO: Administrator Lee Zeldin - U.S. Environmental Protection Agency

FROM: GreenLatinos, WE ACT for Environmental Justice and Climate Justice Alliance

SUBJECT: Extension of Deadlines in Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review Final Rule, Docket ID No. EPA-HQ-OAR-2025-0162

On behalf of GreenLatinos, WE ACT for Environmental Justice, the Climate Justice Alliance, and 106 Environmental Justice, Tribal, and allied organizations, we submit this public comment in strong opposition to EPA's proposed delay of compliance deadlines under the Section 111 Methane Rule. This proposal is unjustifiable, unlawful, and would have devastating consequences for frontline communities, public health, and our collective ability to confront the climate crisis. EPA must abandon it.

For decades, our organizations have represented communities that shoulder the heaviest burdens of fossil fuel pollution. Black, Latino, Indigenous, and low-income families live closest to oil and gas infrastructure, work in the most climate-exposed jobs, and suffer the harshest health harms from methane and its co-pollutants, such as smog-forming volatile organic compounds and air toxics, such as benzene, formaldehyde, and ethylbenzene. The primary purpose of establishing the EPA was to protect human health and the environment. By proposing this delay, the EPA knowingly sacrifices the health, safety, and future of millions of Americans, especially environmental justice communities, at the behest of polluters.

I. Methane Protections Are Urgently Needed

Methane is a super-pollutant, over 80 times powerful than carbon dioxide over 20 years¹, and is responsible for at least one-quarter of the warming we are experiencing today². Oil and gas

¹ <https://sustainability.stanford.edu/news/methane-and-climate-change-0>

² <https://www.unep.org/topics/energy/methane>

operations are a significant global³ and domestic⁴ source of this greenhouse gas, especially through leaks, venting, and flaring during extraction and transport. Making matters worse, at both levels, there has been a systemic underreporting of methane emissions.⁵⁶ Cutting methane pollution is widely recognized as the fastest and most cost-effective way to slow near-term climate warming.⁷ This rule undermines the urgency of climate action and would lock in preventable harm, pushing lifesaving protections further out of reach.

EPA projected that the methane standards would prevent 58 million tons of methane, along with 16 million tons of volatile organic compounds (VOCs) and nearly 600,000 tons of hazardous air pollutants by 2039, avoiding ⁸ up to 1,500 premature deaths and 100,000 asthma attacks every single year⁹. Delaying compliance forfeits these benefits and allows unnecessary death, disease, and environmental destruction.

By EPA's own calculations, delay means 3.8 million tons of methane, nearly 1 million tons of VOCs, and 36,000 tons of toxic air pollutants¹⁰ poisoning the air. This is not an abstract policy shift—it is a decision that will inflict measurable harm on millions of people, to people already facing cumulative pollution burdens.

II. Public Health Impacts of Delay

Methane pollution does not exist in isolation. Oil and gas facilities release methane alongside hazardous pollutants such as benzene, toluene, and formaldehyde¹¹, all of which are linked to cancer, neurological damage, reproductive harms, and respiratory illness. VOCs emitted with methane form ground-level ozone, a pollutant known to worsen asthma, trigger cardiovascular disease, and cause premature death.

A national 2023 study found that air pollution from the oil and gas sector contributed to 7,500 premature deaths, 410,000 asthma attacks, and 2,200 new cases of childhood asthma in a single

³ Lavoie, T. N., Shepson, P. B., & Cambaliza, M. O. (2022). *Global Methane Emissions from Fossil Fuel Extraction and Use: A Review of Recent Studies*. *Environmental Science & Technology*, 56(7), 4070–4085.

<https://doi.org/10.1021/acs.est.2c00097>

⁴<https://www.epa.gov/ghgemissions/methane-emissions>

⁵ IEA. "Overview – Global Methane Tracker 2022 – Analysis." *IEA*,

<https://www.iea.org/reports/global-methane-tracker-2022/overview>.

⁶ "How the Volume of Greenhouse Gases Released by the Oil and Gas Industry Far Exceeds What Regulators Think They Know." *Texas*, <https://cronkitenews.azpbs.org/howardcenter/gaslit/texas.html>.

⁷ <https://www.ccacoalition.org/sites/default/files/resources/files/IGSD-Methane-Primer.pdf>

⁸<https://www.epa.gov/system/files/documents/2023-12/epas-final-rule-for-oil-and-gas-operations.-overview-fact-sheet.pdf>

⁹https://www.epa.gov/system/files/documents/2023-12/eo12866_oil-and-gas-nsps-eg-climate-review-2060-av16-ria-20231130.pdf

¹⁰https://www.epa.gov/system/files/documents/2025-07/oil-and-gas-interim-final-rule-2025_-fact-sheet_0.pdf

¹¹<https://www.epa.gov/system/files/documents/2023-12/epas-final-rule-for-oil-and-gas-operations.-overview-fact-sheet.pdf>

year (2016), imposing an estimated \$77 billion in health costs¹². Another analysis found that pollution from oil and gas venting and flaring alone inflicts \$7.4 billion in annual health damages, including more than 700 premature deaths and 73,000 asthma exacerbations among children¹³. This proposal to delay implementation of the 2024 methane standards prolongs exposure to hazardous air pollutants, intensifying health risks and endangering public health.

III. Disproportionate Impacts on Black, Latino, and Indigenous Frontline Communities

Black, brown, and Indigenous families disproportionately live near oil and gas wells, refineries, and highways, breathing toxic emissions every day. Natural gas leaks are more prevalent in low-income neighborhoods and communities of color.¹⁴ More than 1.6 million Latinos and 1 million Black people¹⁵ live within a half-mile of oil and gas wells, where risks of cancer, low birth weight, and impaired lung function are significantly higher. The Latino Climate Justice Framework (2025–2028)¹⁶ underscores that Latino/a/e communities face overlapping vulnerabilities: high exposure to fossil fuel pollution, elevated energy burdens, and increased risks from man-made disasters. Latino children already face 40 percent higher rates of asthma than their white peers, and communities of color breathe 63 percent more air than white communities.

This is also starkly visible in the St. John Parish in Louisiana, referred to as “Cancer Alley”, a predominantly Black community.¹⁷ In this region, the risk of developing cancer from air pollution in the census tracts closest to fossil fuels and petrochemical facilities is nearly 50 times the national average.¹⁸ Nationally, Black people face a 1.54 times higher pollution burden from particulate matter emissions than the general population.¹⁹ A study in California found significant disparities in exposure to methane super-emitters for “non-Hispanic Black residents [who had a 10% increase in exposure for every 10% increase in residents], Hispanics, and Native Americans,” and a lack of correlation with socioeconomic status. The “intensity” of these super-emitters was also reported to be higher near communities with more people of color.²⁰

¹²<https://www.bu.edu/sph/news/articles/2023/air-pollution-from-oil-and-gas-production-contributes-to-thousands-of-early-deaths-childhood-asthma-cases-nationwide/>

¹³ <https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2023GH000938>

¹⁴ Weller, Z. D., Im, S., Palacios, V., Stuchiner, E., & von Fischer, J. C. (2022). *Environmental Injustices of Leaks from Urban Natural Gas Distribution Systems: Patterns among and within 13 U.S. Metro Areas*. Environmental Science & Technology, 56

¹⁵ Lesley Fleischman & Marcus Franklin. (2017). *Fumes Across the Fence-Line: The Health Impacts of Air Pollution from Oil & Gas Facilities on African American Communities*. Clean Air Task Force & National Association for the Advancement of Colored People. <https://www.catf.us/resource/fumes-across-the-fence-line/>

¹⁶ <https://lcjf.greenlatinos.org/>

¹⁷ University Network for Human Rights. “Waiting to Die: Toxic Emissions and Disease Near the Louisiana Denka/DuPont Plant,” (2019), https://www.epa.gov/sites/default/files/2019-12/documents/waiting_to_die_final.pdf

¹⁸ See footnote 10

¹⁹ Mikati, I., Benson, A. F., Luben, T. J., Sacks, J. D., & Richmond-Bryant, J. (2018). Disparities in Distribution of Particulate Matter Emission Sources by Race and Poverty Status. *American Journal of Public Health*, 108(4), 480–485. <https://doi.org/10.2105/AJPH.2017.304297>

²⁰ Casey, Joan A., et al. “Climate Justice and California’s Methane Superemitters: Environmental Equity Assessment of Community Proximity and Exposure Intensity.” Climate Justice and California’s Methane Superemitters: Environmental Equity

Compounding the health concerns are economic stressors. Just one example is that 52% and 58% of Latino and Black households are renters²¹, making it harder to access efficiency upgrades or protections against high energy costs.

Racial and socio-economic disparities in exposure to toxic pollutants and health impacts are a direct consequence of structural racism in federal policy and historic redlining as evidenced by siting of oil and gas wells in major US cities.²² These inequities are exacerbated by climate change. Latino, Black, and Indigenous workers are overrepresented in outdoor jobs such as construction, agriculture, and delivery, sectors where methane-driven warming and extreme heat put lives at risk. Extreme weather already disrupts Latino communities at higher rates, with one in four Latinos living in a county that faced flooding and a federal disaster declaration in the past year. This vulnerability extends to Black and Indigenous people as well. According to the EPA's Climate Vulnerability Assessment, Black Individuals are 40% more likely to live in areas with the highest projected increases in mortality rates, and Native American Individuals are 48% more likely to live in areas that will be inundated due to sea level rise.²³

To delay methane standards is to knowingly deepen environmental racism. It denies frontline families urgently needed relief from toxic air pollution and exacerbates inequities. Every year of delay is another year of worsening illness, mounting costs, and widening racial health inequities. EPA must not sanction preventable suffering.

IV. Economic and Energy Impacts

Contrary to industry claims, delaying compliance will not protect jobs or stabilize energy markets. In reality, methane mitigation is a proven job creator. There are currently 268 companies in the methane mitigation industry, with more than 1,000 employees nationwide²⁴. This sector has grown rapidly, manufacturing firms increased by 88 percent over the last decade, and are projected to generate over 10,000 net direct and indirect jobs annually through 2035²⁵.

Delaying compliance destabilizes markets, discourages innovation, and penalizes companies already investing in solutions. States across the political spectrum have already incorporated federal methane standards into their implementation plans, and companies such as BP, Equinor,

Assessment of Community Proximity and Exposure Intensity, vol. 55, no. 21, 21 Oct. 2021, pp. 14746–14757., <https://doi.org/10.1021/acs.est.1c04328.s001>.

²¹ <https://www.pewresearch.org/short-reads/2021/08/02/as-national-eviction-ban-expires-a-look-at-who-rents-and-who-owns-in-the-u-s/#:~:text=Nationwide%2C%20about%2058%25%20of%20households,Center's%20analysis%20of%20census%20data>.

²² Gonzalez et al, Historic redlining and siting of oil and gas well in the United States, *Journal of Exposure Science & Environmental Epidemiology*, 33:76–83 (2023), <https://doi.org/10.1038/s41370-022-00434-9>

²³ U.S. Environmental Protection Agency Headquarters. (2021, September). Climate Change and Social Vulnerability in The United States [Announcements and Schedules].

<https://www.epa.gov/cira/social-vulnerability-report>

²⁴ <https://library.edf.org/AssetLink/630bm3846d50uw5yn8hxxoc1ceulxe3t.pdf>

²⁵ <https://www.bluegreenalliance.org/wp-content/uploads/2023/07/0723-Plugging-the-Leaks-2.pdf>

and Oxy have publicly supported strong methane regulation.²⁶ Delay undermines both market certainty and U.S. leadership, especially as one of the world's largest methane emitters^{27 28}.

V. No Justification for Delay

EPA provides no compelling rationale for postponing these protections. Compliance is both feasible and already underway. Courts, including the Supreme Court, have repeatedly rejected industry attempts to delay these rules.

Delaying compliance will not reduce burdens; it will worsen them, locking in toxic pollution, avoidable deaths, and lost jobs. Delay also undermines international credibility, as global markets increasingly demand strong methane controls as a condition of trade.

At best, this proposal is misguided and uninformed. At worst, it represents a blatant disregard for science, law, and communities most at risk.

VI. Conclusion

EPA's mission is to protect human health and the environment. This proposal does the opposite. By delaying compliance with Section 111 methane standards, EPA would knowingly:

- Release millions of tons of methane and toxic pollutants, worsening climate change and air quality.
- Inflict disproportionate harm on Latino, Black, Indigenous, and low-income communities already overburdened by pollution.
- Causes thousands of preventable deaths and billions in healthcare costs.
- Jeopardize job creation and market certainty in a thriving methane mitigation industry.
- Violate its statutory, democratic, and civil rights obligations.

The proposed delay of this rule—alongside the rollbacks of other critical regulations like the Mercury and Air Toxics Standards, vehicle emissions standards, and even threats to the Endangerment Finding—poses serious harm to environmental justice communities, who already live at the breaking point of cumulative pollution. Moreover, relaxed timelines undermine the detection and prevention of fugitive emissions from leaks, slow down local efforts to reduce emissions and protect public health, and favor industry over the people the EPA is meant to safeguard.

²⁶<https://www.naturalgasintel.com/news/bp-chevron-eqt-exxonmobil-oxy-shell-vow-to-curb-more-natural-gas-oil-emissions-as-epa-unveils-stringent-methane-rules/>

²⁷ Hannah Ritchie, Pablo Rosado, and Max Roser (2020) - "Greenhouse gas emissions" Published online at OurWorldinData.org. Retrieved from: <https://ourworldindata.org/greenhouse-gas-emissions>

²⁸ <https://www.epa.gov/ghgemissions/methane-emissions>

We urge EPA to immediately abandon this proposal and enforce the full and timely implementation of the 2024 methane standards. Specifically, swiftly reinstate compliance deadlines for new, reconstructed, or modified oil and gas facilities, as well as the deadlines for states to submit their state implementation plans for existing sources of emissions. In addition to following through with the launch of the Super Emitter program, designed to detect and reduce major methane leaks from the worst offenders. Every day of delay compounds preventable harm. The lives of millions of Americans are at stake, especially those living on the frontlines of oil and gas development, depending on swift action.

Respectfully submitted,

GreenLatinos
WE ACT for Environmental Justice
Climate Justice Alliance

Environmental Justice

350 Central Mass
350 Deschutes
Alaska Community Action on Toxics
Alternatives for Community & Environment (ACE)
Better Brazoria: Clean Air & Water
California Communities Against Toxics
Cherokee Concerned Citizens
Citizens Caring for the Future
Climate First: Replacing Oil & Gas
Commission Shift
Earth Ethics, Inc.
Friends of Toppenish Creek
GAIA (Global Alliance for Incinerator Alternatives)
JPAP
Just Transition Northwest Indiana
Mi Familia en Acción
Micah Six Eight Mission
MoveOn.org HobokenRESIST!
NC Climate Justice Collective
NC Environmental Justice Network
New Mexico Interfaith Power and Light
People's Justice Council
Physicians for Social Responsibility Pennsylvania
Protect Our Water, Heritage, Rights
Recycle And Reinvest
Resist the Pipeline
San Luis Valley Ecosystem Council
Save San Pascual Park

Save San Pascual Parl
SEE (Social Eco Education)
Sowing Justice
Sunflower Alliance
The Alliance for Appalachia
The Clean Air Coalition of Western New York
Tucson's Environmental Justice Task Force
Unitarian Universalists for a Just Economic Community
WERA Co-Founder
West End Revitalization Association - WERA
Young, Gifted & Green
Zero Hour

Tribal

Elsa Caquias
North Dakota Native Vote

Allied Organizations

198 methods
350 Bay Area Action
350 Central Massachusetts
350 Colorado
350.org
350 Hawaii
Advocates for Snake Preservation
American Federation of Government Employees Local 704
Animals Are Sentient Beings, Inc.
Alaska Community Action on Toxics
Between the Waters
Change Begins With ME
Change the Chamber
Clean Energy Action
CleanEarth4Kids.org
Concerned Health Professionals of Pennsylvania
Dakota Resource Council
Dayenu: A Jewish Call to Climate Action
Delaware Riverkeeper Network
Elders Climate Action
Elders Coalition for Climate Action
Endangered Species Coalition
Environmental Health Project
Friends of the Earth
Healthy Environment Alliance of Utah (HEAL Utah)
Healthy Ocean Coalition
Institute for Agriculture and Trade Policy

Institute for Policy Studies Climate Policy Program
International Marine Mammal Project of Earth Island Institute
Jewish Earth Alliance- PA
Just Zero
kyhealthcare.org
Larimer Alliance for Health, Safety, and the Environment
Long Beach Alliance for Clean Energy
Memphis APRI
Midwest Building Decarbonization Coalition
Milwaukee Riverkeeper
Montana Environmental Information Center
Naeva
Nassau Hiking & Outdoor Club
New Mexico and El Paso Interfaith Power and Light
North American Climate, Conservation and Environment(NACCE)
Northeast Organic Farming Association of Rhode Isl
Occupy Bergen County (New Jersey)
Ocean Conservation Research
Oil and Gas Action Network
Peace, Justice, Sustainability NOW
Physicians for Social Responsibility
Plastic Pollution Coalition
Puente Latino Association Inc.
Putnam Progressives
Reclaim Philadelphia
Resource Renewal Institute
Responsible Alpha
Rio Grande International Study Center
Rio Grande International Study Center
Rise Up WV
South Shore Audubon Society
The Center for Social Sustainable Systems
The Last Plastic Straw
Turtle Island Restoration Network (TIRN)
Unitarian Universalists for Social Justice
Wildlife for All