



U.S. AFFILIATE OF INTERNATIONAL PHYSICIANS FOR THE PREVENTION OF NUCLEAR WAR

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

**Comments on the U.S. EPA's Supplemental Rule to Reduce
Climate-Harming Pollution from Oil and Natural Gas Operations**

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January 2023**

My name is Barbara Gottlieb. I am the Program Director for Environment & Health at Physicians for Social Responsibility (PSR). PSR is a national nonprofit organization with 33,000 members and 23 chapters across the country, working to protect humanity from the greatest threats to our health and survival. We count climate change among those threats.

I am pleased to share PSR's concerns about the leaks of methane and accompanying gases from oil and gas wells and equipment.

As EPA is aware, methane is a major accelerator of climate change. Over its first 20 years in the atmosphere, it is over 80 times more powerful than carbon dioxide at trapping heat—and that 20-year timeframe is the timeframe EPA should use in assessing methane's climate impacts, as it corresponds closely to the window available to us to save ourselves, our children and our planet from irreversible, catastrophic climate effects.

That is the major reason PSR applauds the steps EPA has taken to strengthen the draft rule and reduce methane leaks from oil and gas field operations. At the same time, there is more you can do to strengthen the rule. PSR urges you to:

- Reduce flaring by permitting it only when absolutely necessary for safety or maintenance;
- Make standards for emissions from storage tanks applicable to more storage tanks;
- Make monitoring-technology and data widely available so that communities affected by very large leaks can participate in the Super Emitter Response program.

In addition, I'd like to bring to your attention a related problem.

Over the past year and a half, PSR has been documenting that oil and gas companies have been using per- and polyfluoroalkyl substances (PFAS) in wells across the U.S. PFAS are man-made chemicals that are toxic in minuscule concentrations. They are extremely persistent in the environment, winning them the nickname “forever chemicals,” and they accumulate in the human body. Various PFAS have been linked by EPA to hormone disruption, effects on the immune system, cancer, and low infant birth weights—low birth weight being closely linked to infant death in the United States.

EPA is looking closely at the threats from certain PFAS in drinking water. PSR, for our part, is publishing a series of state-specific reports that use industry evidence to document that PFAS chemicals, and/or substances that could degrade into PFAS, are used in oil and gas wells. PFAS tend to make surfaces slippery (as with the now-banned PFAS known as Teflon) so they can be used in the oil and gas industry to increase the efficiency of drilling and the penetration of fracking chemicals underground.

In our reports, we raise the concern that the use of PFAS in both the drilling and fracturing phases could lead to human exposure to these tremendously toxic chemicals. This is along two pathways to exposure. The first is water contamination, in part because chemicals used in drilling are not segregated from groundwater or aquifers the drilling may pass through; thus, the EPA should consider oil and gas operations as the possible source of PFAS in drinking water in homes proximate to drilling and fracking operations.

The second potential pathway is through air, when PFAS used in the fracking phase especially may accompany gas that comes up to the surface and instead of being captured, is burned off through flaring. In regard to the supplementary methane rule, we should consider that reducing flaring may in some cases reduce exposure to highly toxic PFAS chemicals. Given the intersection of EPA's concerns about PFAS more broadly and your regulation of flaring from oil and gas wells, I hope this is something you will look into. PSR's reports on PFAS in oil and gas operations are available on our website and include, to date, the following:

[Fracking with “Forever Chemicals,”](#) July 2021: an early overview of the issue in general. We have become aware of wider use of PFAS chemicals, PFAS precursors and probable PFAS in oil and gas operations since this report was published.

[Fracking with “Forever Chemicals” in Colorado,](#) January 2022: a report detailing where and in what quantities PFAS were used in oil and gas operations in Colorado. This report was utilized by Colorado legislators in building support for, and ultimately passing, first-of-its-kind legislation banning PFAS from use in oil and gas extraction operations in the state and requiring disclosure of all individual chemicals used in oil and gas wells without exceptions for trade secrets.

[Fracking with “Forever Chemicals” in Ohio](#), July 2022: another in our series using industry data to identify where PFAS are used in oil and gas operations. As in other states, we found that the industry relied heavily on confidential business information or “trade secrets” to avoid identifying specifically the chemicals used, thus complicating the responses of first responders, medical providers and others responding to possible exposures.

Our series of reports will continue in 2023 with the publication of reports on PFAS use in oil and gas operations in Texas and New Mexico, expected to be released in late January and/or February, and reports on Pennsylvania and Ohio later in the year. Further information on these reports is available from me, Barbara Gottlieb, at bgottlieb@psr.org.

Again, PSR thanks EPA for taking steps to reduce leaks of methane and other gases from oil and gas wells and infrastructure. We urge you to strengthen this rule as indicated above and to finalize it as soon as possible. In addition, we encourage EPA to investigate the health and climate impacts of PFAS use in oil and gas operations.