Good Morning,

Thank you for the opportunity to speak to you today. My name is Dr. Kelly Kuhns and I am a registered nurse from New Cumberland, PA. As a resident of a state that stands to be significantly impacted by a delay of the EPA Methane Rule and as a member of the Alliance of Nurses for Healthy Environments, I am here today to express strong opposition to any efforts that would block or delay air pollution limits that address the leakage of methane.

Currently, Pennsylvania has over 100, 000 active oil and gas facilities with 1.5 million Pennsylvanians living within a ½ mile of an oil and gas well. [[1]](#footnote-1) The EPA methane rule would require over 800 new and modified wells in Pennsylvania to implement health safeguards to fix and prevent methane leaks[[2]](#footnote-2). It is estimated that these just these 800 wells will be responsible for 125-500 tons of methane pollution and 35-140 tons of Volatile Organic Compound or VOC pollution. While PA does have some state-level leak detection programs, many of these programs are voluntary and a recent report demonstrated that the relatively low monetary fines imposed for violations at drilling sites were not a significant deterrent! As such, the federal methane regulations are essential to protecting the health of our citizens. As a nurse, I have significant concerns of how a delay would impact the health of of our nation.

Limiting emissions of methane helps to mitigate climate change thus decreasing the associated negative health impacts. Limiting emissions of toxic and carcinogenic air pollutants leads to improved health in communities across the country. On a personal level, I have concerns for my own extended family’s health, as they live in Lycoming county less than one mile from several active drilling operations in the Marcellus shale region, and have also agreed to lease their property for future drilling. They agreed to drilling on their farm based on the assurance that every possible effort would be made to limit the impact on air quality. A 2 year delay in implementing the methane regulations means that they will continue to be exposed to toxic air pollutants for 2 more years – this includes my children, one of whom already suffers from asthma, as they frequently work on the farm, wanting to learn and appreciate the impact of farming on our society. As the air quality diminishes, my children will be unable to continue experiencing their own heritage.

Climate change is one of the most serious public health threats we face today. In order to limit climate impacts and protect the health of our children and our communities, the United States must significantly reduce greenhouse gas emissions. Methane is an extremely powerful heat-trapping gas. Over its first years in the atmosphere, it is 84 times more potent as a greenhouse gas than is carbon dioxide. Failure to limit methane emissions will worsen climate change, further contributing to significant public health threats such as vector-borne illnesses, water insecurity and drought, and extreme weather events, such as heat waves.

The increase in the frequency and severity of heat waves has contributed to increases in ground-level ozone and has been linked to increased asthma attacks, cardiovascular harm and even premature death, especially among those with preexisting respiratory conditions, children due to their faster breathing rate and developing lungs, and pregnant women—as exposure has been linked to increased risk of preterm labor and delivery of low birth weight babies.

In addition to decreasing methane emissions, implementation of the Methane rule will lead to immediate reductions in the emissions of hazardous air pollutants, such as VOCs, that are released with methane during oil and gas operations. VOCs also contribute to the formation of ground-level ozone, and some VOCs are precursors to the formation of fine particulate matter which is linked to respiratory and cardiovascular injury, lung cancer and early death. Limiting methane and the subsequent VOC emissions will improve air quality. For children living near oil and gas development sites this means fewer asthma attacks and fewer missed days from schools. This means parents will miss fewer days of work, leading to more economic stability and most importantly, this gives our children the best chance to be successful in school and life.

A delay of the EPA methane rule, even a temporary one, will have significant health impacts for all Americans, but will disproportionally affect at-risk groups, such as infants, children, older adults, those with chronic health conditions, and the millions of Americans living in communities near oil and gas operations.

As a nurse and a parent, I am encouraging the EPA to oppose efforts to delay, revise, or rescind the EPA methane rule. This is a health protective rule and a necessary step to address climate change and improve the health of all Americans.

1. http://blogs.edf.org/energyexchange/files/2017/05/PA-Methane-Problem.pdf [↑](#footnote-ref-1)
2. https://www.edf.org/sites/default/files/content/pa\_fact\_sheet\_nsps.pdf [↑](#footnote-ref-2)