

Program Supervisor, MC 205  
Texas Register/Rule Development Team - Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087 Austin, Texas 78711-3087  
RE: 2024-027-113-AI

January 6, 2025

Dear Program Supervisor:

We write to you as members and leaders of faith communities throughout the State of Texas. As people of faith we feel a strong obligation to care for other people, especially those who are vulnerable or marginalized. These convictions guide our priorities in the public sphere. We are writing to ask that the Texas Commission on Environmental Quality develop a robust State Implementation Plan to ensure compliance with federal Clean Air Act Section 111(d) emission guidelines adopted by the US Environmental Protection Agency.

Methane is an air pollutant that is released by the oil and gas industry at high rates, both intentionally and through fugitive emissions. Methane emissions cause poor air quality, which leads to health impacts, and contributes to climate change. Other states including New Mexico and Colorado have adopted regulations to end methane pollution and waste from oil and gas operations. These have resulted in measurable improvements to air quality. Some of New Mexico's remaining methane-related air pollution comes from oil and gas operations in Texas which are not subject to New Mexico's regulations.

Methane emitted by oil and gas equipment causes health impacts from worsening asthma symptoms to cancer. One study estimated the health costs associated with methane leaks and emissions to be \$7.4 billion dollars annually nationwide, along with 700 premature deaths and 73,000 childhood asthma exacerbations.<sup>1</sup> Air pollution leads to lost productivity, missed days of school and work and the burden of these hardships falls most often on disadvantaged communities who live in the vicinity of oil and gas operations.

Climate change poses serious risks to the people of Texas. We have already seen increases in drought, extreme precipitation, and extreme temperatures which can be attributed to climate change; changes like these are expected to continue and worsen in a warming world. Weather extremes like these cause suffering, economic loss, and even death. Globally, climate change threatens food security, drives political instability,

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<sup>1</sup> <https://www.edf.org/media/new-study-quantifies-health-impacts-oil-and-gas-flaring-us-0>

and causes suffering in a range of ways from disease to loss of ancestral homelands to sea level rise.

As people of faith in Texas, we believe that each person is of intrinsic worth and has the right to a healthy environment. We feel an especially strong sense of care for vulnerable people like the elderly, children, those with chronic lung conditions, and the economically disadvantaged, all of whom are at risk of serious health impacts from both air pollution and climate change. It is all of our responsibility to do what we can to ensure a safe world for our neighbors and the generations which come after us.

A strong State Implementation Plan that requires oil and gas producers to clean up their operations and cut methane emissions benefits Texans by improving air quality and mitigating future impacts of worsening climate change. The technology and equipment required to prevent methane releases are readily available, and in some cases allow captured methane to be sold for a profit to the producer. Federal financial support is also available to support oil and gas operators in improving their operations to prevent methane leaks.

Because a safe environment is essential to the thriving of all people, we as people of faith encourage the Texas Commission on Environmental Quality to develop a strong State Implementation Plan that ensures compliance with the EPA Section 111 methane rule.

With Gratitude,

**Texans of Faith**

Rev. Sarah Allen	David Dow	Garrett Cowan	Marylou Rodriguez
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