



December 19, 2024

Richard Revesz
Administrator, Office of Information and Regulatory Affairs
White House Office of Management and Budget
New Executive Office Building, Room 9235
725 17th St NW
Washington, DC 20503

Re: Pipeline Safety: Gas Pipeline Leak Detection and Repair

Dear Administrator Revesz:

The undersigned health organizations write in support of the proposed rule from the Pipeline and Hazardous Safety Administration to limit leaks of methane from pipelines. We are calling for expeditious finalization for the rule and offer these brief comments in lieu of requesting a meeting with interagency review staff.

In August 2023, national health and medical organizations filed comment with the Department of Transportation/PHMSA urging for the strongest possible rule to reduce methane leaks. Methane is a highly potent greenhouse gas with a heat-trapping capacity more than 80 times that of carbon dioxide over its first 20 years in the atmosphere. Climate change is already a health emergency and to avoid catastrophic tipping points in the climate system, the nation must reduce emissions of greenhouse gases like methane dramatically and quickly.

Besides accelerating climate change, oil and gas production generates pollution that has direct impacts on the health of those living or working near operations or the gathering lines that carry unprocessed gas. Air pollutants emitted alongside methane include volatile organic compounds, polycyclic aromatic hydrocarbons, carbon monoxide, heavy metals and soot and include several known human carcinogens, notably benzene and formaldehyde. Ethylbenzene, another hazardous pollutant from oil and gas emissions, is a probable carcinogen. In addition to these dangers, VOCs also interact with other emissions in the presence of sunlight to form ground-level ozone pollution, which can worsen asthma, increase hospital visits and lead to premature death.

Comments from health groups listed support measures to improve leak detection and repair, reduce venting and other releases of methane and improve the public's access to information about methane leaks. We called for improvements in reporting requirements so that all gathering pipelines are required to report to the National Pipeline Mapping System. We also urged requirements for improved transparency when hydrogen is mixed into natural gas pipeline

systems. The potential threats of hydrogen blending are concerning and, at the very least, the public should know when such blending occurs.

We appreciate PHMSA's proposal that follows the Congressional mandate laid out in the PIPEs Act. We urge a thorough and speedy interagency review and finalization.

Signed,

Allergy & Asthma Network
American Lung Association
Children's Environmental Health Network
Asthma and Allergy Foundation of America
National Association of Nurse Practitioners in Women's Health
National Association of Pediatric Nurse Practitioners
Physicians for Social Responsibility