



THE SISTERS OF ST. FRANCIS OF PHILADELPHIA

July 10, 2017

Docket for rulemaking, “Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements”

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Good afternoon!

I am Sr. Nora Nash of the Sisters of St. Francis of Philadelphia. I thank you for the opportunity to publicly recommend that the EPA implement the methane New Source Standards without delay. I represent my congregation, a community of over four hundred Franciscan women, whose charism calls us to be strong proponents of climate justice, care for creation, and sustainability. I also speak for the Interfaith Center on Corporate Responsibility, <http://www.iccr.org/> and the Investor Environmental Health Network, <http://www.iehn.org/home.php> – two organizations who continue to have positive interaction with corporations on their social and environmental responsibilities and policies. Members work with corporations to build a more just and sustainable world by integrating social and environmental values into investor actions. We accept our moral responsibility to protect our environment, speak for the human rights of communities, human health and the over-all “common good” of society.

As responsible shareholders and stakeholders, we have consistently engaged major oil and gas companies on the need for monitoring and disclosure of methane leakage, on the grounds that what “gets measured gets managed.” Many of these companies have already established performance standards and indicators for greenhouse gas emissions and have begun to implement the finalized rules. In some states, such as the State of Colorado there is little or no dissonance between the state regulations and the US Bureau of Land Management finalized rules to cut methane emissions from oil and gas operations. In fact, some of Colorado’s largest oil and gas producers actually took the initiative and joined with an environmental

group to propose the rules that Colorado adopted. In the State of Pennsylvania, the oil and gas industry had little regulation in its beginning days of shale gas development. As a citizen, I witnessed the severe impacts of contaminated water and polluted air in one community in Washington County, PA. We placed large bottles of drinking water near their mailboxes to show our solidarity. The State has begun to recognize the serious implications of an unregulated industry and is grappling with new methane policies. As the industry expands and new pipelines are crossing the state in an uncontrolled manner, citizens are aware of the possible blast hazards that they face. Delaware and Chester counties will be subjected to excessive exposure to ethane, propane and butane, all coming to the Delaware River for export or manufacturing. An EPA delay on the implementation of the methane pollution standards would be a tragedy for these communities.

As shareholders, we view methane emissions as an inefficient waste of a valuable American resource. Implementation of the New Source Standards would provide investors with the confidence we need to ensure industry and government are taking an active role in protecting our long-term best interests — healthier children, and a clean future. This means that regulations, as previously planned, are necessary to align the interests of investors, communities and corporations.

As stakeholders, the Sisters of St. Francis of Philadelphia, the Interfaith Center on Corporate Responsibility and the Investor Environmental Health Network are committed to supporting New Source Standards. We thank the EPA for officially calling this hearing. Just one last thought on Rachel Carson's observations that could inspire us to limit human-induced global climate change — she said:

"The balance of nature is not a status quo; it is fluid, ever shifting, in a constant state of adjustment. Man, too, is part of this balance. Sometimes the balance is in his favor; sometimes—and all too often through his own activities—it is shifted to his disadvantage."

Rachel Carson, Silent Spring, page 246

Respectfully submitted,



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