

January 19, 2022

Mr. Michael Regan
Administrator of the U.S. Environmental Protection Agency
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear EPA Administrator Regan,

On behalf of Wespath Benefits and Investments (Wespath), we welcome the opportunity to comment on the methane regulations administered by the Environmental Protection Agency (EPA).

Wespath, through its subsidiaries, manages over \$29 billion in assets on behalf of more than 100,000 retirement plan participants of The United Methodist Church (UMC) and over 140 institutional clients which are United Methodist-related charitable organizations. We are the largest denominational investor in the United States investing one of the largest U.S. pension funds.

As a long-term, broadly diversified institutional investor, we recognize that economic stability is integral to ensuring that our participants retire comfortably, and our investors attain their organizational missions. We believe that, to ensure economic stability and achieve the financial returns necessary to reach these important goals, the world needs to transition to a sustainable global economy. Policy that supports responsible management of climate risk is a fundamental aspect of this transition.

Methane is a key contributor to greenhouse gas emissions, with 86 times more potency than carbon dioxide over a 20-year period. Given this potency, in a recent report the Intergovernmental Panel on Climate Change identified methane as an emission that governments and industries must aggressively manage in the short-term to limit the potential for catastrophic long-term warming.

As an active shareholder engagement advocate with the oil and gas industry, Wespath recognizes that the industry has made significant progress, but there is still much more that must be done to accelerate the needed emissions reductions. The EPA's proposed standards for oil and natural gas methane emissions are an important step in the right direction. We urge you to ensure strong methane emission performance standards by crafting regulation that:

- Maintains strong provisions for the deployment of zero-emitting pneumatic controllers;
- Maintains or expands strong leak monitoring and repair standards, including expanded use of advanced leak detection technologies;
- Expands upon the proposed rule to include all potentially significant sources of methane emissions, including smaller leak-prone wells, subject to emission standards;
- Sets a near-term end date for operators to cease routine flaring of natural gas at oil and gas facilities, as states like Colorado and New Mexico have already done;



Wespath

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- Establishes a transparent, credible and empirically based methane emissions reporting framework to improve the accuracy of reported methane emissions data, enabling investors to clearly differentiate between leaders and laggards;
- Regulates against orphan and abandoned wells, which are a significant source of methane emissions and a risk to public health and safety.

We believe that the regulatory framework described above would benefit long-term diversified investors, who need effective management of climate risk to achieve long-term returns commensurate with their goals. We thank the EPA for their existing work and encourage the agency to strengthen the proposed rule to include all regulatory elements stated above and issue the most comprehensive methane standards possible.

Sincerely,

David H. Zellner
Chief Investment Officer
Wespath Benefits and Investments