

**Subject:** FW: Your Comment Submitted on Regulations.gov (ID: BLM-2018-0001-0001)  
**Date:** Monday, April 23, 2018 at 4:20:38 PM Central Daylight Time  
**From:** Peter Severson  
**To:** Shantha Ready Alonso

Hi Shantha,

Thanks for reaching out. I was able to go to the website this afternoon to submit the comment below.

Peter

On 4/23/18, 3:19 PM, Regulations.gov wrote:



*Please do not reply to this message. This email is from a notification only address that cannot accept incoming email.*

**Your comment was submitted successfully!**

**Comment Tracking Number:** 1k2-92r9-bh7o

**Your comment may be viewable on Regulations.gov once the agency has reviewed it. This process is dependent on agency public submission policies/procedures and processing times. Use your tracking number to find out the status of your comment.**

**Agency:** Bureau of Land Management (BLM)

**Document Type:** Rulemaking

**Title:** Waste Prevention, Production Subject to Royalties, and Resource Conservation: Rescission or Revision of Certain Requirements

**Document ID:** BLM-2018-0001-0001

**Comment:**

Dear Secretary Zinke,

On behalf of the Creation Care Team of the Rocky Mountain Synod of the ELCA, we strongly urge you to uphold the Bureau of Land Management Methane Waste Prevention rule.

Our position on this important question is deeply rooted in our Lutheran faith commitments. As recently articulated by our Presiding Bishop Elizabeth Eaton in her Earth Day 2018 message, “As members of the Evangelical Lutheran Church in America (ELCA), we share a deep love for all of God's creation and a profound responsibility for it.”

At the most basic level, rescinding this rule would lead to preventable methane waste.

In Colorado, advocates from our denomination and many partner groups worked tirelessly to pass state-level waste prevention measures. As good as they are, these state level measures are insufficient by themselves. In the Four Corners area, God’s people and all God’s good creation exists under a massive cloud of methane which is observable by NASA from outer space. This cloud, as well as pollution from

operations in neighboring states, do not respect state lines. Air travels, and therefore we need to level the playing field with equal methane waste prevention standards nationally. For this reason, we participated in the rule-making process in 2016 by sending people to testify at public hearings in favor of this much-needed rule. So far, there have been no public hearings about the rescinding of the rule. We request an explanation of why the Department of Interior made this decision.

We know that methane and the volatile organic compounds released with it contribute to asthma, cancer, and a host of other health problems. Communities of color and people who are poor are least able to cope with these health burdens.

Furthermore, we are profoundly concerned about the damage methane does to the safe, stable climate God entrusted to us. Methane is a highly potent greenhouse gas which contributes to unstable weather patterns that interfere with farming and agriculture. While our ELCA World Hunger program evaluates the role of the Church in coping with severe weather and drought impacts on our global food system, the least we can do is stop the needlessly reckless release of dangerous methane gas into our air. We urge you not to rescind the 2016 Methane Waste Prevention rule.

Respectfully,

Peter Severson, Director of Lutheran Advocacy Ministry-Colorado, on behalf of the Creation Care team of the Rocky Mountain Synod ELCA

**Uploaded File(s):**

*No files uploaded*

**This information will appear on Regulations.gov:**

*None of the information will appear on Regulations.gov*

**This information will not appear on Regulations.gov:**

First Name: Peter

Last Name: Severson

**For further information about the Regulations.gov commenting process, please visit <https://www.regulations.gov/faqs>.**