



Independent Regulatory Review Commission – IRRC

Regulation #7-544

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Public Comment - 7/21/22

My name is Vanessa Lynch and I am providing testimony on behalf of the over 100,000 members of Moms Clean Air Force in Pennsylvania who are fighting to protect our children's health from air pollution. I live in Southwestern Pennsylvania along with my family near oil and gas operations. I encourage you to approve the modest oil and gas air pollution protections being presented today. Delaying this rule, as has been suggested by some members of the House Environmental Resources and Energy Committee, would jeopardize federal funding that communities depend on and subject those living near producing oil and gas wells to more pollution.

As a major oil and gas producing state, Pennsylvania has a responsibility to step up and be a national leader in reducing harmful pollution from oil and gas operations in order to protect communities. Unfortunately, Pennsylvanians have waited years for meaningful and comprehensive rules on existing operations to materialize while other oil and gas producing states like Colorado and New Mexico have lived up to their responsibilities and created strong protections.

Air pollution regulations are fundamental to protecting frontline communities like mine from the health- and climate-harming pollution of the oil and gas industry. As a mother who lives with both conventional and unconventional oil and gas wells in my community, my family deserves a strong and comprehensive Pennsylvania oil and gas air pollution rule to protect the future and health of my children.

Instead, what we got was a weak rule. The federal guidelines on which this rule is based provide a baseline for state action. Rather than living up to the state's obligation to its frontline families, Pennsylvania missed an important opportunity to create regulations that were stronger than these baseline standards to protect its residents. The state rule exempts the vast majority of small wells with leak-prone equipment, around 63,000, from leak detection and repair standards.

Scientific studies, many of which have been done in Pennsylvania, show families who live near oil and gas operations are more likely to experience adverse birth outcomes, heart disease, cancers, asthma attacks and respiratory problems. Families throughout Pennsylvania are also dealing with the devastating impacts of increasingly powerful storms and soaring cases of Lyme disease resulting from increased tick populations caused by climate change. Regrettably, Pennsylvania's incidence of Lyme disease is the highest in the nation.

The cumulative impacts of oil and gas air pollution, public health costs, and climate change-related weather impacts make it clear Pennsylvania must robustly address climate-warming methane pollution.

Despite the omission of low-producing, marginal wells in Pennsylvania, it is still critical that these rules move forward. Air and methane pollution regulations have real public health benefits especially for young children whose lungs are still developing. For every day of delay, my children who live on the frontline of the oil and gas industry will have to wait longer for comprehensive oil and gas pollution protections.

