

Stephen Hoffman

#3256

**From:** ecomment@pa.gov  
**Sent:** Wednesday, June 17, 2020 12:50 PM  
**To:** Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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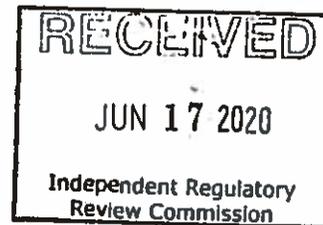


**Re: eComment System**

**The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544).**

Commenter Information:

Jessica Rocco  
(jrocco@triblive.com)  
221 Meadow Spring Rd  
Greensburg, PA 15601 US



Comments entered:

Dear Pennsylvania Department of Environmental Protection,

The Pennsylvania Department of Environmental Protection's proposed rulemaking to limit climate-warming methane pollution and harmful volatile organic compounds from existing oil and gas operations is a great step forward in Pennsylvania's efforts to curb climate pollution and protect public health. However, the proposal currently allows inspection loopholes for certain wells that would leave a sizable amount of climate-warming methane pollution unchecked. Leaks can occur any time and from any well.

Pennsylvania cannot achieve Governor Wolf's climate goals without strengthening the proposed existing source rule. I urge the Department to make the following improvements:

- \* Close the loophole in the proposed rulemaking that exempts wells that produce lower amounts of oil and gas from the rule's requirements to find leaks and repair them. Low-producing wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania and all wells, regardless of production, require routine inspections.
- \* Research shows that large, uncontrolled leaks are random and can only be detected with

frequent and regular inspections. Therefore, we ask the DEP to eliminate the part of the draft rule that allows operators to reduce the frequency of inspections if previous inspections do not reveal significant methane leaks. Ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources.

Regards,  
Jessica Rocco

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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