

From: ecomment@pa.gov
Sent: Monday, June 22, 2020 3:11 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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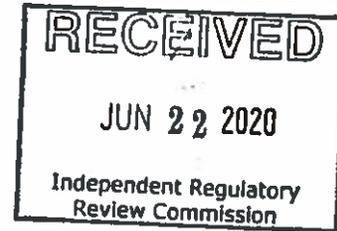


Re: eComment System

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:

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Comments entered:

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 marks great progress in Pennsylvania’s efforts to curb climate pollution and protect public health. However, the proposal currently includes loopholes for certain wells from leak detection and repair (LDAR) requirements that would leave a sizable amount of climate-warming methane pollution unchecked. Large 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 low-producing wells from the rule’s LDAR requirements. 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.
- Eliminate the provision that allows operators to reduce the frequency of inspections if previous inspections do not reveal significant methane leaks. Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections.
- Ensure this proposal includes control requirements for all emission sources that are covered in DEP’s already adopted general permits for new oil and gas sources, GP-5 and GP-5A .

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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