

Stephen Hoffman

#3256

From: ecomment@pa.gov
Sent: Thursday, June 25, 2020 9:38 AM
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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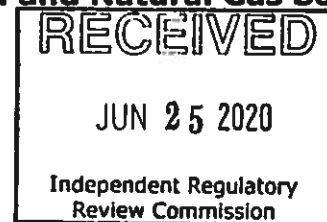


Re: eComment System

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:

Alexandra Huddell
private citizen (alex.huddell@gmail.com)
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Comments entered:

The proposed regulation to control methane emissions from existing oil and gas operations by setting volatile organic compound emission standards falls short of the necessary action Pennsylvania needs to take to reduce our carbon footprint and improve air quality for its citizens. The regulation should include low-producing wells also, which according to analysis from the Environmental Defense Fund, account for half of methane emissions in Pennsylvania. Governor Wolf should take stronger action on climate change and close this loophole that only benefits the oil and gas industry at the cost of increased greenhouse gas emissions that threaten human health and our environment in Pennsylvania.

In a Science article, Alvarez et al. 2018 found that actual methane leaks from the U.S. soil and natural gas supply chain are ~60% higher than the U.S. EPA inventory assessment due to emissions occurring during abnormal operating conditions. The authors found that these methane emissions "per unit of natural gas consumed, produced radiative forcing over a 20-year time horizon comparable to the CO2 from natural gas combustion." And according to this report by Zeke Hausfather from the University of California Berkeley, on a 20-year timeframe, with a 4.8% methane leak rate from natural gas production, new natural gas production can have a greater global warming impact than coal.

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Pennsylvania DEP and Governor Wolf should be taking the lead on reducing methane and VOCs from the oil and gas industry supply chain. Both actions have public health benefits for Pennsylvanians, and reducing methane emissions is critical.

References:

Alvarez, Ramón A., Daniel Zavala-Araiza, David R. Lyon, David T. Allen, Zachary R. Barkley, Adam R. Brandt, Kenneth J. Davis, et al. "Assessment of Methane Emissions from the U.S. Oil and Gas Supply Chain." *Science* 361, no. 6398 (July 13, 2018): 186.
<https://doi.org/10.1126/science.aar7204>.

Zeke Hausfather. *Climate Impacts of Coal and Natural Gas*.
<http://static.berkeleyearth.org/pdf/climate-impacts-of-coal-and-natural-gas.pdf>

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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