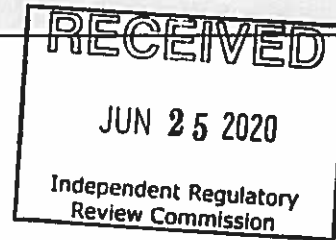


**Stephen Hoffman**

#3256

**From:** ecomment@pa.gov  
**Sent:** Thursday, June 25, 2020 6:09 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:

Diane Ward  
resident (pekin\_2@yahoo.com)  
902 Grove School Rd  
Wysox, PA 18854 US

Comments entered:

My name is Diane Ward and I am a resident of Standing Stone Twp, Bradford County, PA. First, I want to thank the DEP for proposing a regulation as important as this one is to us, the residents of PA, and even to those beyond the borders of our state. All too often, the air that we breathe is taken for granted

It has been a long road from where we began with unconventional gas in PA to where we are now. Although I respect some of the DEP's reasons for limiting this regulation to higher production level wells, I would ask that you review your position on that issue. Conventional wells generate methane and VOCs, and should not be exempt from this regulation, nor should low production unconventional wells, abandoned wells, or small portable sources such as small liquefaction units on well pads and other specialized equipment.

Living in the gas fields, I have had the opportunity to see, hear, smell and even taste the effects of VOCs and methane in our environment. I have had the need to bear witness to air quality impacting events, calling gas operators and the DEP alike, so that these events could be brought to an end as soon as possible.

Too many people in our state do not feel that they should report the issues that they perceive and the events they witness. PA residents could be the DEP's and the operators' greatest allies in moving the oil and gas industry forward toward environmental soundness. I am commenting today to ask the DEP to harness the power of the public, with cameras in hand, as the eyes,

ears, and noses which can move the industry toward improved compliance. We all recognize that most gas facilities are normally not staffed. The DEP inspection teams are perennially understaffed. A significant public outreach effort, spearheaded by DEP, could increase the probability that VOC and methane emitting events would not go unnoticed by the industry and regulators. Problems would get fixed, improvements would be made, and the quality of the air we breathe would benefit.

I've been told the following by DEP personnel: 1) A picture taken by a private citizen can't be used for enforcement action. The DEP must take pictures of violations. 2) If odors are noted beyond the property line of a facility, no response can occur unless there are three complainants. 3) Opacity can only be read by trained observers. And so forth

These procedures, policies, and protocols must change. Greater respect for the public's contributions, input and capabilities must be shown. If a resident hears a methane vent as loud as a jet plane, it should not matter whether the township or county has a noise ordinance. The DEP should set up procedures that are private citizen involvement friendly. When the DEP takes a citizen call and sends an inspector three days later, the DEP loses its opportunity to show leadership in guiding the industry's behaviors and responses.

Thank you for exploring the thought of significantly broadening your public outreach, with the aim of increasing the public's involvement out in the field, as part of these regulations.

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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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