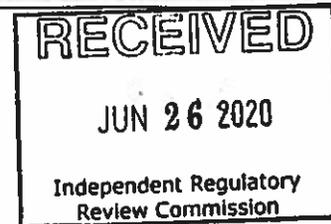


**Stephen Hoffman**

# 3256

**From:** ecomment@pa.gov  
**Sent:** Friday, June 26, 2020 9:50 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:**

Bryn Hammarstrom  
Vice Pres, Pine Creek Headwaters Protection Group (bryn@fea.st)  
P.O.Box 455  
Wellsboro, PA 16901 US

**Comments entered:**

At our monthly meeting on June 25, 2020, the Board of Pine Creek Headwaters Protection Group [a 30+ year-old non-profit Watershed Organization based in Wellsboro, Tioga County] voted unanimously to endorse the Clean Air Council statement on this rulemaking matter. As Vice President of the organization, I reprint the C.A.C. statement here:

"The climate crisis is already harming Pennsylvania residents with extreme events such as record-breaking heat and severe storms that cause flooding and hundreds of millions of dollars in property damage. Increasingly warmer temperatures from climate change will lead to additional air pollution, floods and droughts, decreased crop yields, and a rise in vector-borne diseases like Lyme disease. Pennsylvania leaders must take strong action now to address the climate crisis before it is too late.

"Cutting methane pollution from the oil and gas industry is the quickest, most cost-effective way for Pennsylvania to reduce climate-warming greenhouse gases. Methane, the main component of natural gas, is a potent greenhouse gas that is responsible for 25 percent of the climate change we're already experiencing worldwide. Over a 20-year timeline, methane is 87 times more potent than carbon dioxide at trapping heat in our atmosphere. Pennsylvania's oil and gas industry vents and leaks a whopping 1.1 million tons of methane each year, over 16 times more than what industry self-reports to the state, according to a 2020 analysis by the Environmental

Defense Fund. The annual climate impact of this pollution is double the impact of tailpipe emissions from all cars in Pennsylvania combined.

"It is encouraging that the Pennsylvania Department of Environmental Protection has proposed a rule to reduce methane and harmful pollutants from existing natural gas infrastructure. This proposal marks great progress in Pennsylvania's actions to curb pollution that fuels climate change. While the proposed rule is critical for cutting climate-warming methane and harmful volatile organic compounds (VOCs) from oil and gas sources, it unfortunately includes loopholes that would leave over half of all potential cuts to methane pollution from the industry unchecked. The proposed rule exempts thousands of low-producing wells from leak inspection requirements. Another industry loophole in the proposal would allow operators to reduce the frequency of inspections if a small enough percent of equipment is found to be leaking on-site. Unfortunately, large leaks can occur from any source at any time and are difficult to predict. The Department must remove these loopholes to ensure we are cutting as much methane as is feasible.

"Without adopting a strong final rule, Pennsylvania cannot achieve Governor Wolf's climate goals to reduce Pennsylvania's greenhouse gas emissions 80 percent by 2050 (compared to 2005 levels). Achieving these goals will ensure Pennsylvania does its part to reduce its disproportionate contribution to the climate crisis. In the face of rollbacks of oil and gas methane rules by the Trump administration, Governor Wolf taking action to adopt the strongest possible methane rule in Pennsylvania is more important than ever. As the second-largest natural gas producing state in the nation, Pennsylvania has a responsibility to step up and be a national leader in reducing harmful methane and air pollution from existing sources. In addition, as the third-largest greenhouse gas polluting state in the nation, Pennsylvania bears an outsized responsibility to address climate change.

"Pine Creek Headwaters Protection Group urges the Department to make the following improvements to the proposed rule:

"Close the loophole in the proposed rulemaking that exempts low-producing wells from the rule's leak inspection 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 reveal that only a small percentage of components is leaking. Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections.

"Ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources.

"Thank you for considering our testimony. In summary, please close the industry-friendly loopholes and adopt a strong final rule that helps meet our state's climate goals and tackles the climate crisis."

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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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