# 3256

## Stephen Hoffman

From:

ecomment@pa.gov

Sent:

Thursday, July 9, 2020 1:32 AM

To:

Environment-Committee@pasenate.com; IRRC; 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:

Fred Kraybill (fredkraybill@yahoo.com) 7211 Thomas Blvd Pittsburgh, PA 15208 US RECEIVED

JUL - 9 2020

Independent Regulatory Review Commission

## Comments entered:

I am very concerned about climate change and air pollution and we must make the rule for VOC emissions as strong as possible.

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 leak detection and repair 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 requirements for all emission sources covered in DEP's already adopted standards for new and modified natural gas facilities.

Thanks.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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