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Stephen Hoffman

Form Letter B 148-649

From: Edinger, Laura <ledinger@pa.gov>
Sent: Friday, July 10, 2020 2:34 PM
To: IRRC
Cc: Corinne Brandt; Fiona Cormack
Subject: RE: [External] RE: Form Letter Notice - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

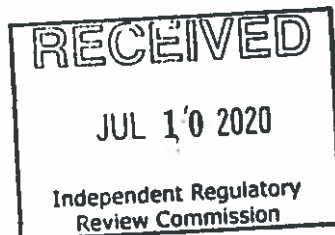
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You, too, Steve!

And an update for you – worked it out with our IT person (who really is the best) and the results, to date, are as follows:

Form Letter B: 649

Form Letter A: 206



Form Letter: Enhance Methane Emissions Rule

Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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:

1. 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.
2. 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.
3. Ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources.