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Stephen Hoffman

From: ecomment@pa.gov
Sent: Monday, July 13, 2020 9:38 PM
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Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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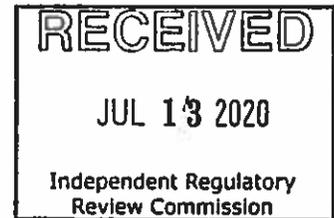


Re: eComment System

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:

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Comments entered:

Please see attached comments submitted for the June 25th Environmental Quality Board virtual public hearing. Thank you.

These links provide access to the attachments provided as part of this comment.

Comments Attachment: [June 25'20 - EQB Public Hearing - Control of VOC Emissions.pdf](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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**Testimony of the Marcellus Shale Coalition
Environmental Quality Board #7-544 Proposed Rulemaking
Control of VOC Emissions from Oil and Natural Gas Sources**

**Submitted by:
Patrick Henderson
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June 25, 2020 Public Hearing

Good evening and thank you for the opportunity to provide comments at today's virtual hearing. My name is Patrick Henderson and I am presenting this testimony on behalf of the Marcellus Shale Coalition (MSC). The MSC was formed in 2008 and represents the leading operators that are active in Pennsylvania's unconventional natural gas industry, as well as the supply, consultant and professional services companies that partner with the industry.

The MSC appreciates the opportunity to participate in this virtual public hearing. We will be preparing detailed comments for review and consideration by the Department prior to the conclusion of the public comment period.

Pennsylvania's shale gas industry takes seriously its responsibility to operate safely and efficiently and prides itself in going above and beyond federal and state environmental standards. After all, our employees live in our local communities, and have a vested interest in ensuring that our water, land and air resources are protected and enhanced.

Natural gas operators are rightfully proud of their contribution to reducing climate change inducing emissions, and have led the way through their participation in initiatives such as One Future, API's The Environmental Partnership, the U.S. EPA's Methane Challenge and the Global Methane Initiative, to name a few. Nearly two-thirds of MSC Board members participate one or more of these initiatives. These programs come at a time when national production of natural gas has increased to historic levels, reducing our dependence on foreign sources of energy and providing critical feedstock necessary for consumer and medical goods, such as those needed to respond to the current global pandemic.

As the Department and public consider this proposed rulemaking, it is critically important to do so with an accurate context of the contribution natural gas has made to enhancing air quality. Consider the following:

- Compared to 1990, domestic natural gas production is up 50%, while the *methane emissions* rate has *declined by 43%*
- In Pennsylvania, the percentage of electricity generated from natural gas has increased from approximately 1% in 2000, to nearly 40% today
- Since 2005 – the early advent of shale gas development in PA – *volatile organic compound emissions* (VOC) from Pennsylvania’s power generation sector have *declined by 33%*
- Since 2005, *SO2 and NOx emissions* from Pennsylvania’s power generation sector have *declined by 93% and 80%, respectively*
- From 2010 through 2017, *carbon dioxide emissions* from Pennsylvania’s power generation sector have *declined by 36%*, far surpassing the goals laid out in both Governor Wolf’s Executive Order as well as the Paris Climate Agreement

These reductions of VOCs, SO₂, NO_x and carbon dioxide largely are attributable to the increased use of natural gas. As a result, Pennsylvania’s air is cleaner than it has been since the dawn of the industrial revolution, and thousands of lives have been saved – and the health of thousands of more enhanced – due to increased air quality.

As the Department moves forward with this rulemaking, we encourage all parties to recognize these benefits and foster policies to encourage the continued development and use of Pennsylvania’s natural resources.

Thank you.