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Sent: Monday, July 20, 2020 12:47 PM
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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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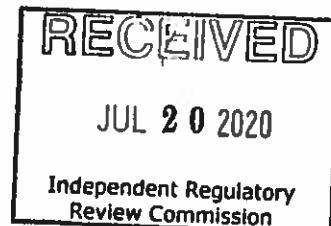


Re: eComment System

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:

Chester Spohn
JKLM Energy LLC (cspohn@jklmenergy.com)
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Butler, PA 16002 US



Comments entered:

To Whom It May Concern:

I am writing to provide comments on the Environmental Quality Board's proposed rulemaking #7-544 – Control of VOC Emissions from Oil and Natural Gas Sources. I support the technical comments from the Marcellus Shale Coalition.

Pennsylvania has a rigorous program of existing environmental regulations for all aspects of unconventional gas industry. Pennsylvania's regulatory requirements, voluntary efforts by the natural gas industry and increased utilization of natural gas have contributed to improved air quality in Pennsylvania over the last few decades. Total VOC emissions decreased by 56% between 1990 and 2017. Total NOx and SOx reductions during this timeframe were 84% and 92%, respectively. In the power generation sector, where natural gas use has increased significantly, NOx and SOx reductions between 2005 and 2017 amount to 80% and 93%, respectively. VOC emissions from the sector declined by 33% during this timeframe. In addition, production-based methane emissions intensity, expressed as metric ton CO₂ equivalent /barrel of oil equivalent, declined in the Appalachian region between 2011 and 2017 by 82%. Furthermore, CO₂ emissions from Pennsylvania's power sector decreased by 35% between 2010 and 2017. These air quality improvements have saved countless lives and significantly reduced

respiratory-induced hospitalizations while providing billions of dollars in public health benefits to the citizens of Pennsylvania.

As a Professional Engineer employed in the Pennsylvania unconventional natural gas industry, I know first-hand that every aspect of our industry is already strictly regulated by the Commonwealth. In addition, the last thing gas producers want is the loss of their product through leaks. Therefore, leaks are identified and repaired in an expeditious manner due to the negative economic impact they present. Also, technological improvements in equipment that reduce gas usage/losses are already employed due to the economic advantages they provide, along with the need to meet the existing EPA and DEP regulations. The EQB's proposed rulemaking #7-544 – Control of VOC Emissions from Oil and Natural Gas Sources is an unnecessary proposal, creating undue financial burden on an industry that is already in distress due to low commodity prices.

I was born, raised, went to college in and have always resided in Pennsylvania. I've been an engineer in Pennsylvania for over 25 years. Prior to the growth of the unconventional gas industry in Pennsylvania I was employed at various manufacturing facilities. All of these facilities are no longer in business or have moved their operations outside of Pennsylvania. I can't imagine what the economic environment would be in Pennsylvania without the unconventional natural gas industry (especially in Southwestern PA and the northern tier). I imagine the economic outlook in these areas would be very similar to the southern tier of New York state.

I am proud to work in Pennsylvania's natural gas industry. The natural gas industry benefits all Pennsylvanians with increased sales for all Pennsylvania businesses, royalty's for landowners, impact fees that greatly benefit the communities where the wells are drilled, enhanced employment opportunities, reduced energy costs for all natural gas and electricity consumers and a significantly improved air quality to what existed within Pennsylvania just a decade ago. I respectfully urge you to base your decisions on facts while recognizing and continuing to encourage the advancement of the industry.

Thank you for your consideration.

Chester "Chad" Spohn III
Pipeline/Facilities Manager
JKLM Energy LLC

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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