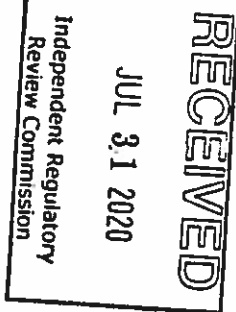


32SP



RE: Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

Hello,

My name is Alex Downing. I am a resident of Allison Park, Pennsylvania, part of the suburbs just north of Pittsburgh.

There are at least 89,320 oil and gas wells in the state of Pennsylvania according to the Department of Environmental Protection. That's 89,320 locations in our state which **MUST** be regularly monitored for fugitive emissions of methane and volatile organic compounds into the ground and air.

And because we live atop the Marcellus Shale Formation, and because Governor Wolf and the current administration has decided to handcuff the future of our state's infrastructure and economic stability to the natural gas industry through his disastrous Restore PA plan, the number of these wells and the facilities and pipelines associated with them, will continue to grow. So it's important to me, as a young person who will be forced to deal with the impact of these hundreds of thousands of potential leaking hazards for decades to come, that the state take the necessary steps now to ensure that our constitutional right to clean air and water are protected.

According to a recent report by the Environmental Defense Fund, that has not been the case in the past. They found that the Pennsylvania DEP grossly underreported methane emission levels in its 2017 report -- the estimated emissions are 16 times greater than those reported by the state. In fact, 5 different counties are estimated to have emitted more methane on their own than the DEP reported for the whole state.

These discrepancies are due in part to the same loopholes that exist in the newest DEP emissions guidelines under discussion today. Currently, the state does not monitor the majority of conventional wells in operation; the newest guidelines do nothing to resolve this issue. In fact, the proposal states the following:

*"Of the 71,229 conventional wells reporting production, only 303 are above the 15 barrels of oil equivalent per day production threshold ... and will have fugitive emissions component requirements."*

That leaves 70,926 low-production conventional gas wells, which the EDF claims are responsible for about half of the state's methane emissions, unregulated for leaks.

These leaks are disastrous for the environment as methane is 28 times more potent as a greenhouse gas than carbon dioxide, far outweighing the benefits it provides as an alternative to coal and oil when burned off properly. If the discrepancies reported are correct, then nearly 71,000 wells will continue to be at risk of leaking methane without protections in place to detect or repair them. The proposal, then, **MUST** be revised to add more oversight for these low-production conventional well sites.

The proposal also fails to mention abandoned wells as an area of concern. While these sites are no longer used to extract oil and natural gas, they pose the same risk of leaks as those currently in operation and often are left in ruins and ignored by regulators. PIOGA estimates the number of these abandoned wells to be in the hundreds of thousands.

And while the risk of leaks occurring is relatively low compared to active sites, they do still occur. A recent report from Reuters linked 281 kilotons of methane emissions in 2018 to abandoned wells across the country, equivalent to 16 million barrels of crude oil. Since the proposal reports far fewer wells to be monitored than PIOGA estimates are in existence, one can only assume the state does not plan on seeking out these abandoned sites and monitoring them. The proposal, then, **MUST** add provisions for tracking down and regulating these abandoned wells to detect leaks more comprehensively.

Increasing the amount of wells to be monitored, namely low-producing conventional wells and abandoned wells, by tens or hundreds of thousands likely sounds economically and logistically unattainable, and that's the point: as the 2nd largest natural gas producer in the country and 3rd largest greenhouse gas emitter, the state of Pennsylvania has to make a decision. We can either continue spending exorbitant amounts of money and resources trying to patch up leaks of greenhouse gasses and carcinogenic VOCs as fast as they arise in an ever-expanding natural gas network like an unwinnable game of pipeline whack-a-mole; or we can invest that money in clean energy solutions that won't contribute to the climate crisis or put the public's health at risk. I urge the DEP to pursue these solutions rather than propping up fossil fuel industries until it's too late to change course.

Alex Downing

References:

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