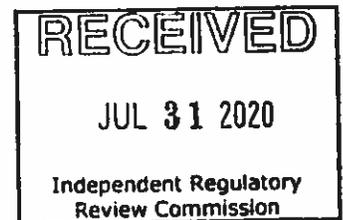


3254

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, July 24, 2020 11:06 AM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 1 - Proposed #7-544
Testimony date: 6/23/2020 12:00:00 AM
Testimony location: WebEx

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:

April Clisura
(april.clisura@gmail.com)
347 Kaercher St.
Pittsburgh, PA 15207 US

Comments entered:

Oral comments given at 23 June 2020 hearing. See emailed written comments below:

Good evening. I am a resident of the City of Pittsburgh and a stay-at-home mom and volunteer. I am very concerned about the amount of methane the Commonwealth contributes to the problem of greenhouse gases as the second largest natural gas producing state and third largest greenhouse gas producing state. I was very alarmed when I learned that methane is 80 or more times more potent in causing the greenhouse effect than carbon dioxide during its first 20 years up in the atmosphere. While other factors like transportation contribute significantly to climate change, methane emissions from the oil and gas industry have double the annual climate impact of all the cars in PA, according to analysis by the Environmental Defense Fund.

As much as these conditions are a problem, think of the opportunity PA regulators have at this moment to make a big impact on methane pollution. That is why I'm speaking this evening, to implore regulators to strengthen these draft rules. PA and the world have already identified a path to reach the necessary greenhouse gas reductions to mitigate the worst impacts of global warming, and making a few changes to these draft regulations would ensure that PA makes its very significant contribution. On a local level, PA residents who live near wells and other oil and gas infrastructure - old or new - need to be spared from the health effects of ground ozone and VOCs associated with methane emissions, such as detriments during pregnancy, asthma, cardiovascular and respiratory disease - even stunted lung size in children - which could be further complicated by the threat of new respiratory viruses, like Covid-19. On a global level, we know that residents of island nations are already crying out for help about sea level rise and that the poorest people the world over and in the US are going to suffer more from the social and economic impacts of a changed and more volatile environment. In recent years we have learned that polar ice melt may be more unpredictable than publicly available projections indicate.

Please include low-producing wells in the leak detection and repair requirement in the final rule because they are responsible for more than half of methane pollution from oil and gas sources. What if a low-producing well sits there and leaks for years? No one should be able to walk away from a well and leave it unaccounted for - that is a luxury that Pennsylvania and the world can no longer afford. We must start putting more effort into the process of stopping as much methane as we can. All leaking wells have a cost to the people of PA and companies that own the wells must start paying a more true and accurate cost of maintenance.

The evidence shows that large unplanned methane leaks are random, so please take out the allowance for operators to reduce the frequency of inspections over time.

Finally, please take a look over at the DEP's already-adopted standards for new oil and gas sources, and make sure that all emissions sources covered there are also covered in the final rules you are working on today.

Regulators, the decisions you make following this public input process will potentially be historic. We don't know right now what the outcome of the climate crisis is going to be, but people will look back and ask whether the entities that had the ability to act did so at the 11th hour, really where we are right now at the last opportunity to make a difference.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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