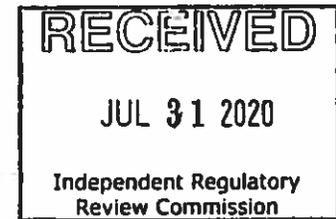




CHESAPEAKE BAY FOUNDATION
Saving a National Treasure

3256



July 27, 2020

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105
Via eComment: <http://www.ahs.dep.pa.gov/eComment>

RE: Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources [25 Pa. Code Chs. 121 and 129].

Dear Members of the Environmental Quality Board,

On behalf of The Chesapeake Bay Foundation (CBF) and its more than 300,000 members and e-subscribers, we express our support for the Pennsylvania Department of Environmental Protection (DEP) adopting a comprehensive rule to cut methane (CH₄) from existing oil and gas operations. Furthermore, we urge the administration to strengthen the draft rule, as published in the Pa. Bulletin (50 Pa.B. 2633; May 23, 2020) by limiting the exemption for so-called “low-producing” wells.

CH₄ is a greenhouse gas with a climate change inducing potential that is 84 times more potent than carbon dioxide (CO₂) over 20 years and 28 times more potent over 100 years.¹

According to the Environmental Defense Fund, Pennsylvania’s oil and gas operations release more than 1.1 million tons of CH₄ into the atmosphere annually. CH₄ is responsible for approximately 25 percent of the climate change Pennsylvania experiences today.²

The impacts of climate change to Pennsylvania’s economy, communities, and environment are significant and myriad. For instance, climate change can negatively impact human health through increased heat island effect formation³, increased ground level ozone levels which can exacerbate

¹ Sidder, Aaron. “In Pennsylvania, Methane Emissions Higher Than EPA Estimates.” Eos. 14 May 2019. [cos.org/research-spotlights/in-pennsylvania-methane-emissions-higher-than-epa-estimates](https://www.cos.org/research-spotlights/in-pennsylvania-methane-emissions-higher-than-epa-estimates).

² “Methane: The Other Important Greenhouse Gas.” Environmental Defense Fund. www.edf.org/climate/methane-other-important-greenhouse-gas

³ “Climate Change and Heat Islands.” EPA, Environmental Protection Agency, 1 Mar. 2019, www.epa.gov/heatislands/climate-change-and-heat-islands.

acute and chronic lung and heart disease⁴, increased novel and existing insect-borne diseases⁵, and increased intensity and total precipitation resulting in flooding which can endanger lives and property.⁶ Furthermore, climate change has been implicated reduced production of key agricultural commodities for over 50,000 family farms that make up Pennsylvania's leading industry.⁷

Importantly, research suggests that actions to reduce emissions of CH₄ have the potential to lower its atmospheric concentrations even more quickly than those of CO₂, thus slowing the rate of warming over the next few decades while society works to reduce the emissions of longer-lasting gases such as CO₂.⁸

Compellingly, there is a wide array of existing cost-effective options to reduce CH₄ throughout the natural gas supply chain, many with estimated payback periods of a year or less.⁹

In conclusion it is DEP's constitutional duty as a trustee of the Commonwealth to take affirmative actions in providing its citizens clean water and pure air.¹⁰ Governor Wolf recognized the need to improve greenhouse gas emissions by signing Executive Order 2019-07 As Amended, in order to help move the Commonwealth into reducing its emissions through regulations and possibly entering into the Regional Greenhouse Gas Initiative in the coming years. Through this rulemaking and others that take steps in reducing CH₄ and other greenhouse gases from our Commonwealth, DEP is making positive strides towards climate change.

Thank you for the opportunity to comment.

Sincerely,



Shannon Gority
Pennsylvania Executive Director
Chesapeake Bay Foundation

⁴ "Air Pollution Can Accelerate Lung Disease as Much as a Pack a Day of Cigarettes." ScienceDaily, ScienceDaily, 13 August 2019, www.sciencedaily.com/releases/2019/08/190813180833.htm.

⁵ "Climate Change and Public Health - Disease Vectors." Centers for Disease Control and Prevention, Centers for Disease Control and Prevention, 18 June 2020, www.cdc.gov/climateandhealth/effects/vectors.htm.

⁶ "What Climate Change Means for Pennsylvania." EPA, Environmental Protection Agency, August 2016. EPA 430-F-16-040, <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-pa.pdf>

⁷ "Pennsylvania Climate Impact Assessment Report Topics in Focus: Agriculture," Pennsylvania State University, 02 February 2016, https://iee.psu.edu/sites/default/files/ag_factsheet.pdf

⁸ "Scientific Perspectives Related to Methane Emissions in Maryland" Maryland Department of Environment, 24 October 2016, <https://mdc.maryland.gov/programs/Air/ClimateChange/MCCC/STWG/STWGMethaneRept10242016.pdf>

⁹ "Recommended Technologies to Reduce Methane Emissions." EPA, Environmental Protection Agency, 23 April 2019. www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions.

¹⁰ The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people. Article I, Section 27 of the Pennsylvania Constitution. See also, *Pa. Envtl. Def. Found. v. Cmwlth*, 161 A.3d 911 2017 Pa. LEXIS 1393 (Pa. 2017).