

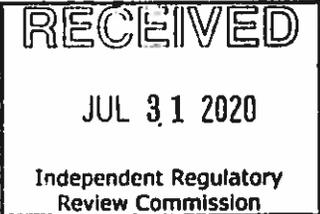
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**Kathy Cooper**

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**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-jflanaga@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 3 - Proposed #7-544  
**Testimony date:** 6/25/2020 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:**

Corinne Mayland  
(corinnem@protonmail.com)  
705 Whites Road  
Lansdale, PA 19446 US

**Comments entered:**

Oral comments given at 25 June 2020 hearing. See emailed written comments below:

I applaud the extensive time and efforts invested in drafting the proposed rules. It takes a lot to get input, build a framework, and iron out the details. I want the proposed rulemaking to pass, and I want edits so that it achieves even more emissions reductions. Specifically, I want

1. To remove the exemption that low production sites would have from fugitive emissions inspections (AVO and LDAR). Make it universal to all well sites and infrastructures.
2. The frequency of fugitive emissions inspections to be constant over time. So please remove the option for operators to reduce the frequency of LDAR.
3. A single standard for whether a storage vessel is an affected source. Remove the distinctions made for conventional vs. unconventional and for construction year, and instead use the

proposed 2.7 tpy threshold for all of them.

4. Concomitant rules about decommissioning wells in a manner that protects the environment, with potential incentives for compliance.

I am here talking to you today because I am concerned about both VOC and methane emissions, though it's the collateral reduction of methane emissions that especially interests me. As we all have certainly heard before, in the first 20 years after it is released into the atmosphere, methane heats up the climate over 80 times more than an equivalent amount of carbon dioxide (CO<sub>2</sub>), according to the Intergovernmental Panel on Climate Change (IPCC). To head off even more intensely chaotic weather activity, we must dramatically decrease carbon emissions in the next 10 years. We need to accelerate our carbon emissions reductions, and aggressively reducing methane emissions helps us achieve that.

My first three requested edits are about removing the exceptions so we can have a common standard that reduces more methane emissions. Here's an analogy to help get my point across. Most of us own a car in Pennsylvania. You want to drive it, you have to get an annual inspection and an annual emissions test. There's no exemption if you only drive the car a little. There's no less frequent testing if you pass. And there's no difference if your car is a 2013 or earlier model. To be legal on the road, the car has to get an annual inspection and emissions test. The same principles apply here: 1) low producing wells should be required to do AVO and LDAR inspections, 2) operators should not be able to opt to less frequent LDAR inspection, and 3) the type of well and construction year should have no role in determining if a storage vessel is an affected source.

Some might push back on my request, saying, 'they're just small sites with relatively small emissions'. But there are tens of thousands of low-producing conventional wells, and all together, those small sites add up. The Sierra Club, citing research conducted by The Environmental Defense Fund, estimates that the low-producing, conventional gas wells are responsible for about half of the methane emissions from Pennsylvania's oil and gas industry. I also recognize that my requested changes mean perhaps thousands more operators would be subject to the rulemaking. And yes, the cost to operators of meeting the requirement may cause many of the low producing well sites to no longer be financially viable. That's just the business concept called economies of scale. But the modified rule introduces a potentially negative effect: a well's production may be halted, but the well left in limbo and not fully decommissioned. What is needed is for DEP to conduct a review of existing requirements for capping wells, and operators to get incentives to follow through so the sites are not lingering emitters. The DEP is already struggling to remediate old legacy wells; we don't need our kids, future taxpayers, to inherit the cost of more wells in need of remediation.

All my proposed modifications are also intended to better align the known and anticipated downstream costs to the upstream source. Right now, the public is bearing the healthcare costs of those emissions, and the public is paying the increasing costs of climate change, which are known to be amplified in the short term by methane. Setting comprehensive emissions reduction requirements shifts the costs from the public to triggering source of those costs, the operating wells and stations.

In order for us to do more for the health and safety of our citizens, which is at the core of the DEP's mission, please pass the proposed rules, and strengthen them with the more expansive requirements I've outlined. Thank you.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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