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## **Kathy Cooper**

From:

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Sent:

Friday, July 24, 2020 2:49 PM

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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Re: eComment System

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JUL 31 2020

Independent Regulatory Review Commission

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:

Domenic Tedesco (datedesco@pennenergyresources.com) 1000 Commerce Drive Pittsburgh, PA 15275 US

Comments entered:

To Whom It May Concern,

I am writing to provide comments on this proposed rulemaking, and also indicate my support for the comments submitted by the Marcellus Shale Coalition (MSC).

As a long-time air quality professional, I am fully aware of the stout and numerous air quality regulations that Pennsylvania oil & gas operators have historically and must currently navigate in order to maintain compliance. Such programs include NSPS (JJJJ, IIII, OOOO & OOOOa), NESHAP (ZZZZ, HH & HHH), conditional Exemption #38 (a, b & c), General Permits (5 & 5A), to name just a few of the primary ones. To say that this industry is unregulated or under-regulated is a blatant falsehood - if that were the case I would not have a job.

I am also aware of the enormous economic contributions that the industry has made to thousands of families (mine included) and many communities in the Commonwealth, as well as the voluntary efforts the industry has made to reduce emissions and maintain the environments in which it and its employees operate. I will not go into the details of the emissions reductions (others will cover the specifics of those), but as a lifelong PA resident and also an asthma

sufferer, I truly appreciate the fact that this industry has steadfastly embraced environmental stewardship. Despite the repeated publications to the contrary, I know firsthand that the oil & gas industry has made vast contributions already to air quality improvement.

It should be noted that, in addition to the various rules which already govern emissions reductions and leak detection and repair practices (of which there are many) and a continual focus on environmental stewardship, this industry has a financial incentive to recover as much product as possible. Additional regulation must be carefully considered in a scientific manner - it must be based on sound technical regulatory analysis to promote cost-effective emissions reductions. Yes - cost-effective. It is easy to say that one wishes to cut emissions to zero, yet I doubt that anyone will be turning off the furnace that heats themselves (using methane as the fuel source) and their family in the middle of winter - all human activity has an environmental cost, and the goal should be impact minimization and/or mitigation.

I appreciate your consideration of these comments, as well as those of others who may have a different viewpoint. The crafting of effective and meaningful environmental regulations should always include input from every side. Thank you.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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