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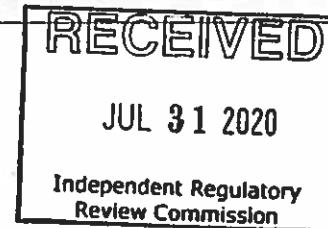
Kathy Cooper

**From:** ecomment@pa.gov  
**Sent:** Monday, July 27, 2020 8:05 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**



**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:**

Donna McKee  
(donna\_mckee@verizon.net)  
666 Rt. 113  
Lederach, PA 19450-0129 US

**Comments entered:**

**Pennsylvania Environmental Quality Board:**

I am writing in regard to the proposed rulemaking: Control of VOC Emissions from Existing Oil and Natural Gas Sources (#7-544). The DEP's proposal to limit climate-warming methane pollution and harmful volatile organic compounds (VOCs) from existing oil and gas operations represents important and much needed progress in Pennsylvania's efforts to curb climate pollution and to protect the health of its citizens. However, the proposed rule contains loopholes for certain categories of wells from leak detection and repair (LDAR) requirements, as well as the specified daily production threshold, that would leave a significant amount of climate-warming methane pollution unchecked.

Many VOCs are suspected or known to cause cancer in humans, have been associated with birth defects and threats to pregnancy, and can cause damage to the liver, kidney, the central nervous system. In addition, they contribute to ground-level ozone or smog that can worsen respiratory diseases and increase the risk of heart disease and heart attacks. Oil and gas producers should not be allowed to externalize these costs of methane and other VOCs that are predictable outcomes of their business, or to avoid the cost of preventing them. Pennsylvania

cannot achieve Gov. Wolf's climate goals without strengthening the proposed existing source rule. Therefore, I ask that you strengthen the existing source methane rule in the following ways:

- 1.) Close the loophole in the proposed rulemaking that exempts low-producing wells from the rule's LDAR requirements. Low-producing wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania. Large leaks can occur at any time from any well. All wells, regardless of production, require routine inspections.
- 2.) Eliminate the provision that allows operators to reduce the frequency of inspections, if previous inspections do not reveal significant methane leaks. Research show that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections.
- 3.) Decrease the daily production threshold specified by the regulation, which would allow at least 61% of methane emitted to the atmosphere to escape undetected. This is well over half of the methane well emissions and is unacceptable. It needs to be reduced to a reasonable level. I would suggest no more than 10% or, preferably, less.
- 4.) Ensure that this proposed rule includes requirements for all emissions sources covered in DEP's already adopted standards for both existing and new oil and gas sources. And include all equipment on the well pad that is capable of leaking and do not exempt any from inspection.

Pennsylvania needs strong action on this effort, now, more than ever. Not only are we experiencing a severe heat wave, and yet another of the hottest years on record with dramatically worsening GHG-fueled climate change, but we are in the middle of a deadly pandemic. We know that air pollution exacerbates the heart and respiratory conditions that make COVID-19 even more deadly. And, as the third largest greenhouse gas polluting state in the country, Pennsylvania has a responsibility to take bold and urgent climate action. This must be a critical component of any path forward.

Furthermore, the methane mitigation industry is rapidly growing in our state and will bring much needed, family-sustaining jobs for both entry-level and highly-skilled employees. Thus, it will be a 'win-win' for Pennsylvania's citizens in terms of both public health and job growth. It will also be a big win for our climate and environment, which sustains us all.

With all of this in mind, I strongly urge you to strengthen and finalize the existing source methane rule as described above, as soon as possible. Thank you for the work you do to protect our health and environment. I hope and trust that you will do what is best for the future of all Pennsylvanians.

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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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Jessica Shirley  
Director, Office of Policy