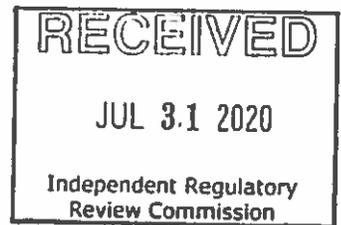


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Testimony for Control of VOC Emissions from Oil and Natural Gas Sources
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My name is Eric Langenmayr, I am a retired PhD chemist and spent 30 years as a chemist for a global specialty chemical company in an R&D setting. I am a resident of Philadelphia, Pennsylvania. Thank you for the opportunity to testify this evening.

Two global crisis threaten our world today, the corona virus pandemic and climate change caused by GHG emissions. Although the pandemic seems more urgent, climate change is likely to have far greater consequences unless we sharply curtail GHG emissions. The two crises are linked. The Covid19 pandemic has caused an unexpected decrease in CO2 emissions this year and offers us a unique chance to slow the rate of climate change.

Pennsylvania is in the position to contribute to the needed reduction of GHG emissions with a strong effective rule for regulation of existing oil and gas well sites.

The proposed rule, targeted to reduce VOC emissions which would also significantly reduce methane emissions, from existing Oil and Natural Gas Sources in PA is a good rule, and a step in the right direction. It's good that the rule is on its way to being realized. The rule requires companies to install equipment to reduce VOC emissions and inspect sites for leaks every 3 months.

Since PA is one of the nations leading producers of natural gas, this rule can significantly reduce both greenhouse gas emissions and ground level ozone pollution.

However, there are four changes to this proposed good rule that I believe should be made and would result in a much stronger, more effective rule.

First, the proposed regulation exempts conventional wells that produce a small amount of gas, under 15 barrels of oil equivalent per day. This means that only 303 of the 71,229 conventional wells reporting production will be required to follow the rule - over 99% of these wells will have no requirement to follow the new rule. The Environmental Defense Fund has estimated that Oil and gas wells in PA emit more than 1.1 million tons of methane yearly, about 600,000 tons from conventional wells. Methane leaking at these low producing exempted wells will not be covered by the proposed rule. Research has shown that these low producing wells can emit just as much or even more than higher producing wells.

Second, eliminate the provision that allows less frequent equipment inspections if previous inspections did not reveal significant leaks. Equipment wears out with time so one inspection may not be predictive of future inspections. A site that previously had little leakage could become a site with big leaks in time and so we must be both prudent and vigilant in measuring methane leakage.

Third, include in this proposed rule all of the emission sources that DEP included in their recent rule (2018) regulating emissions from new unconventional gas wells.

Finally, please consider targeting methane directly in the new rule. Much of the Marcellus Shale in PA is comprised of dry gas which contains a much lower fraction of VOCs allowing more methane emissions.

We are at a watershed moment with regard to taking effective action to slow climate change and leave us with a livable planet.

There are many reasons to to be alarmed.

EPA proposals to weaken or eliminate requirements for controlling methane emissions from oil and gas sites requires PA to issue a strong rule.

Methane is a strong greenhouse gas, as much as 80 times stronger than carbon dioxide in the first 20 years after emission. Recent studies show that methane emissions from oil and gas wells have been hugely underreported by industry, negating much of the reduced greenhouse gas benefit of using natural gas in place of coal.

The proposed rule is a good start, but now is the time to issue a much stronger rule which will take us much further along the path to reduce methane emissions. PA needs to lead the way! Now is the time for PA to do a piece of the work needed to protect our grandchildren and future generations.

In summary, I strongly urge you to adapt the 4 recommended changes so that a strong, effective rule is issued.

Thank You for considering my testimony.