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Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

Amendments to 25 PA. Code CHS. 121 and 129

June 24, 2020

Gwen DiPietro, PhD

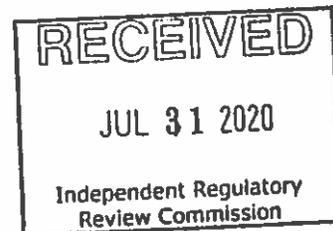
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Private citizen



Hello, my name is Gwen DiPietro. I am commenting as a private citizen of the Borough of Edgewood in Allegheny County. I am an engineer, with degrees in chemical engineering from the University of Virginia, and civil and environmental engineering from Carnegie Mellon. I currently teach Sustainable Engineering Principles at CMU, and have worked for EPA's Greenhouse Gas Reporting Program for the past 5 years as a contractor. I also worked for EPA for many years in the hazardous waste identification program, the industrial solid waste program, and managed the Federal construction and demolition debris program.

I am testifying today to urge you to establish the strictest of controls on gas wells, regardless of size or age. In our long history as an industrial state, we have made the mistake over and over of taking baby steps when giant steps have been required.

Pennsylvania has a long history of running its various natural resources down to the bones, with an even longer history of having to patch our shared environment back together afterwards. We cut down our forests, we pumped out our oil, we tapped the easy gas in the near subsurface, we dug out our coal from the hillsides, the subsurface, and now our farmlands. We polluted our rivers and lakes, and washed away our topsoil. And now we are cracking our rockbed to extract natural gas, creating a fractured subsurface with unclear consequences, and known impacts to our waterways. Most critically of all, we are releasing tremendous new volumes of greenhouse gases to the

atmosphere, at a time when we need to be drastically reducing these emissions to avert the dire consequences of climate change.

From an asset management perspective, we have the ability to monitor leaks in real time, and then correct those leaks. This saves resources for future needs, and reduces current impacts to the climate and our health. We already have thousands of abandoned shallow wells across the state that leak and are extremely difficult to find and remediate. It makes good sense to institute monitoring everywhere possible, now, while it's a straightforward job, rather than hoping for the best, and struggling to find the leaks at some point in the future. Think about how hard it has been to reclaim our acid mine runoff damaged streams. It will be even harder to find invisible leaking wells in the future without regular and effective monitoring.

Natural gas prices are extremely low as a result of our rapid deployment of fracking in the Marcellus and Utica formations underlying PA. If the prices come up a little bit in order to cover the cost of monitoring, it is a cost we are well positioned to pay, indeed that we are responsible for paying. In contrast, the health and climate change induced costs associated with VOC and methane emissions will be extraordinarily high.

I urge you to remove the proposed exemption for low producing wells, and to require frequent and effective inspections on all wells. We cannot let this opportunity pass.