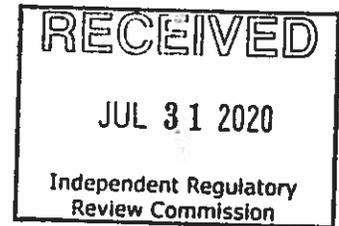


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Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

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My name is Jennifer Tobin, and I live in Philadelphia. Thank you for giving me the chance to share my thoughts with you about the methane gas rulemaking you are engaged in right now.

Since I'm number 41 on the list of speakers, you've already heard much of what I want to say. So I'll focus my comments on the issue of frequency of inspections.

The point of inspections is to identify problems so that they can be fixed.

The point of regular and frequent inspections is to prevent as many problems as possible – especially if the problems can arise quickly and randomly, as leaks can.

It makes no sense to exempt a producer from regular and frequent inspections, as this would defeat the purpose of having inspections in the first place. Having a loophole that enables small producers from this requirement basically amounts to adopting a “hear no evil/ see no evil” approach. But even if we choose to close our eyes and cover our ears this does not mean that there is no evil. The problems are still there, even if they are being ignored. This is not what environmental protection is about.

As humans we are generally procrastinators. We wait until the last minute to do things we don't want to do. We ignore problems that seem too large, or intractable, or complicated to resolve. This tendency is what got us into the climate change fiasco we are currently in. But you have the opportunity, and the important responsibility, to choose a different path when promulgating this rule. You can make the rule have meaning and have a fighting chance of remedying the huge problem of climate change from greenhouse gas emissions that we have been ignoring for decades. I urge you to do just that.

Thank you for listening to my thoughts and for your time.