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Independent Regulatory
Review Commission

Dear Members of the Environmental Quality Board,

As members of varied faith communities, we have a moral responsibility to care for the most vulnerable and to act as good stewards of our Common Home. Unfortunately, the Commonwealth of Pennsylvania is falling short on both as we have some of the worst air quality in the nation, and it is only getting worse.

One of the major sources for our compromised air quality remains pollution from the oil and gas industry.

Nearly 311,000 children in Pennsylvania attend 1,118 schools within a half mile of oil and gas facilities, exposing them to emissions of methane and toxins. Overall, more than 1.5 million Pennsylvanians live in this danger zone.

Peer-reviewed medical research identifies emissions from oil and gas extraction and production as threats to life and health, raising the incidence of numerous health issues among Pennsylvania's children, pregnant women, seniors, and other vulnerable populations. Pennsylvania's natural gas operators are estimated to emit over one million tons of methane every year – more than 16 times what they report to the state Department of Environmental Protection (DEP).

With these methane emissions come other air pollutants such as volatile organic compounds (VOCs) that are under-reported by 60,501 tons (63,500 tons emitted to 2,999 tons reported). These pollutants contribute to ground-level ozone or smog, worsen respiratory diseases, and increase the risk of heart disease and heart attacks.

While the most vulnerable among us are most impacted, all Pennsylvanians suffer from this pollution. Further, the Centers for Disease Control reports that people suffering from medical conditions including heart disease, diabetes and lung disease, which are worsened by air pollution, are “at higher risk for severe illness from COVID-19.”

Fugitive methane not only contributes to direct health impacts but to indirect threats as well. Temperatures in Pennsylvania increased 1.8°F in just the last century. If we do not choose a better path, Pennsylvania will warm another 5.4°F by 2050. We must choose Life for the world and all who live in it.

Increased temperature heightens smog levels and is at least partially responsible for the Lyme Disease epidemic currently sweeping through Pennsylvania, to say nothing of West Nile and other vector-borne diseases down the road. Our climate has changed, and leaking methane makes it worse.

Methane is eighty-six times more powerful at trapping heat than carbon dioxide. It fuels climate change, placing an even greater burden on our children, their future families, and their communities. Responsibility to our neighbors now and to generations to come call us to do better, now that we know better.

While methane poses an enormous climate risk, those living closest to wells are at greater exposure to VOCs including known cancer-causing chemicals such as benzene and toxics such as toluene, which is known to cause damage to the nervous system and affect the growth and health of children. The children of our Commonwealth are not immune to these effects.

For all these reasons, we support the DEP's draft rule, newly released for comment, titled **Control of VOC Emissions from Oil and Natural Gas Sources**. While methane is not named in the title, we know that the proposed rule is part of the DEP's methane reduction strategy, because methane is so frequently co-emitted with these VOCs.

While the proposed rule as it stands is a good start, the DEP must strengthen the proposed existing source rule to protect the health of our children, the vulnerable, and those most at risk, while reducing Pennsylvania's perhaps most harmful greenhouse gas.

To improve the rule as currently written, we urge the DEP to:

1. Reduce or close the loophole for low-producing wells, which are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania; and
2. Remove the clause that allows operators to use a previous finding of no significant leaks to justify a reduction in inspection frequency. Uncontrolled leaks can happen at any time and can only be detected with frequent, regular inspections.

For far too long, we have prioritized the fossil fuel industry over the health of our people, and our communities. It is past time to make a better covenant with the future

Sincerely,

(Signers' organizations are listed for affiliation purposes only)

The Rev. Alison M. Cornish, Executive Director, Pennsylvania Interfaith Power & Light

Tracey DePasquale, Director, Lutheran Advocacy Ministry in PA

Rev. Joan Sabatino, Director, Unitarian Universalist PA Legislative Advocacy Network

Sister Mary Elizabeth Clark, Sisters of St. Joseph Earth Center, Philadelphia, Pa.

Rev. Dai Morgan, United Methodist Advocacy in Pennsylvania

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Sister Nora Nash, Sisters of St. Francis of Philadelphia

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Rev. Thomas A. Sweet, Pastor, Market Square Presbyterian Church, Harrisburg

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cc: Governor Tom Wolf

Secretary Patrick McDonnell