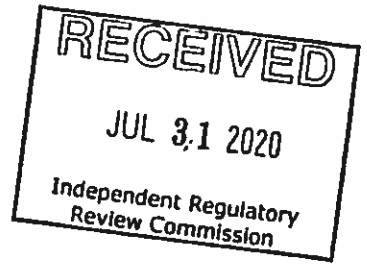


3250

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, July 24, 2020 11:06 AM
To: Environment-Committee@pasenate.com; IRRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

CAUTION: ****EXTERNAL SENDER**** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 2 - Proposed #7-544
Testimony date: 6/24/2020 12:00:00 AM
Testimony location: WebEx

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:

Judy Morgan
(judymorgan711@yahoo.com)
16 W. Moreland Ave
Philadelphia, PA 19118 US

Comments entered:

Oral comments given at 24 June 2020 hearing. See emailed written comments below:

I am concerned that the proposed regulation does not sufficiently protect Pennsylvanians from climate change. I have a background in environmental education and the prospect of what climate change can mean in PA and throughout the world is personally very distressing to me. If we do not act forcefully now, we will face a world of increasing weather extremes, droughts, floods, horrific storms, and potential food disruptions over the next few decades. Global CO2 concentrations hit an all-time high last month despite the avowed commitment of most governments to reduce CO2 emissions. We cannot afford additional delay in decreasing fossil fuel use as rapidly as possible.

The fossil fuel industry must recognize it has a moral responsibility to take leadership in the transition to clean energy, rather than opposing the steps needed. I ask anyone on this call associated with the fossil fuel industry to imagine looking into the eyes of their grandchildren and saying, "I'm sorry I failed to do the hard work that needed to be done to protect you, to ensure that you have a safe world to live in". We can't do this - We can't fail in our responsibility.

One simple, necessary step is to act immediately to end any unnecessary leakage of methane, a major contributor to climate change, into the environment. The proposed regulation of methane leaks is a very positive step. However, several loopholes must be addressed so that it can be as effective as it needs to be.

I urge the Department to make the following improvements to the proposed rule:

- Close the loophole in the proposed rulemaking that exempts low-producing wells from the rule's leak inspection requirements. Low-producing wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania and all wells, regardless of production, require routine inspections.
- Eliminate the provision that allows operators to reduce the frequency of inspections if previous inspections reveal that only a small percentage of components is leaking. Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections.
- Ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources.

Thank you for this opportunity to express my concerns and requests.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov