

**Kathy Cooper**

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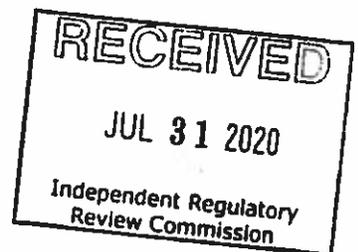
**From:** ecomment@pa.gov  
**Sent:** Friday, July 24, 2020 11:06 AM  
**To:** Environment-Committee@pasenate.com; IRRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment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

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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:

Kari Pohl  
Sisters of St. Joseph of Baden, PA (kpohl@stjoseph-baden.org)  
952 Franklin Ave. Rear  
Aliquippa, PA 15001 US

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Comments entered:

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

My name is Sr. Kari Pohl and I live in Aliquippa, PA, which is located in Beaver County. I am a member of the Sisters of St. Joseph of Baden, PA—a Catholic organization of women religious. I would like to thank the Environmental Quality Board for accepting comments regarding the Proposed Rulemaking of 25 Pennsylvania Code Chapters 121 and 129.

The Sisters of St. Joseph of Baden have been active for many years in the fight against human trafficking. As a result, I recently found myself reading a book called "The Outlaw Ocean: Journeys Across the Last Untamed Frontier" by Ian Urbina. (I recommend the book.) In it, he documents the human trafficking and slavery that is rampant in the global fishing industry. He

speaks of efforts made by the government of Thailand to curtail human trafficking and slavery, and I quote:

"Many of the new rules introduced by the Thai government to combat sea slavery on boats in the South China Sea focused on bigger ships because new rules would be too financially burdensome to the mid-sized ones, even though the mid-sized ships were far more numerous and more prone to trafficking.

In fact, this tendency toward solutions that just ever so barely missed their target was so common that it became tough not to wonder whether it was intentional. While some people might dismiss this speculation as conspiracy theory, I see it more as pattern recognition. I also wondered whether this slick practice was just the sort of sleight of hand that industries pay high-priced consultants to provide."

While I am certainly encouraged that the Pennsylvania Environmental Quality Board is proposing a rule to limit harmful methane and VOC emissions from existing oil and gas operations, I'm concerned that this is one of those near misses that Mr. Urbina refers to in his book.

Low-producing wells account for more than half of the methane pollution from oil and gas sources in Pennsylvania, and yet, they are precisely the ones that would be exempt under the proposed Control of VOC Emissions from Oil and Natural Gas Sources rule. I ask that you close the loophole that exempts low-producing wells from the rule's leak detection and repair requirements and that you eliminate the provision that would allow operators to reduce the frequency of inspections just because previous inspections did not reveal significant leaks. Large, uncontrolled leaks can happen at any time and are often only detected during regular inspections. These actions are critical to ensuring the health and safety of Pennsylvanians now and into the future.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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