

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, July 24, 2020 11:06 AM
To: Environment-Committee@pasenate.com; IRRC; 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 1 - Proposed #7-544
Testimony date: 6/23/2020 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:

Bernard Greenberg
Pennsylvania Chapter - Sierra Club (hikerbern@comcast.net)
894 Jefferson Way
West Chester, PA 19380 US

Comments entered:

Oral comments given at 23 June 2020 hearing. See emailed written comments below:

For the past five years I have been Chairman of the Southeastern Pennsylvania Sierra Club's Pipeline Committee and during this time I have become very familiar with the harmful effects of methane emissions. I will begin by listing six facts underlying the problem for the residents of our Commonwealth.

1. Pennsylvania is the 2nd largest natural gas producing state in the US.
2. Pennsylvania is the 3rd largest green house gas polluting state in the US.
3. The Environmental Defense Fund estimates that Pennsylvania natural gas operators emit more than 1.1 million short tons of methane/year or 15 times what they report to the DEP.

4. One and one half million people live within one half mile of oil and gas facilities in this state.
5. Pennsylvania already has some of the worst air quality in the US.
6. It is projected that by 2030 20 million tons of methane will be emitted and existing protections will only decrease it to 14 million tons.

Global warming is a serious concern now and for future generations. Methane is responsible for ~25% of current climate change. It is 86 times as potent as CO2 over a 20 year period. Most of our residents are well aware of the dangers of global warming and support measures to mitigate it.

Approximately fifty percent of emissions are from conventional wells and fifty percent from unconventional wells. Leaks are by far and away the biggest problem and large uncontrolled leaks can occur at any time. We must protect our residents who live near well pads particularly children, pregnant women, the elderly, poor, people of color, and all those with chronic medical conditions.

A loophole exists in the draft rule and thus fifty percent of the methane emission problem is not addressed. A strong methane emission rule could reduce pollution by sixty percent.

The DEP needs to develop a strong existing source methane rule that is cost-effective and protects the health of our residents. It must consider the effect of emissions in contributing to global warming which if unchecked will have catastrophic consequences. Now we must strengthen the rules by permanently closing two obvious loopholes.

I'm asking for two changes:

1. Include all low-producing wells which are responsible for one half of the methane pollution in the draft rule.
2. Eliminate the provision in the draft rule that permits operators to reduce the frequency of inspections if previous inspections failed to reveal significant leaks. Frequent regular inspections remain the mainstay for detecting leaks.

Strong protections can drastically reduce methane emissions which will protect the health of our residents and diminish the risks from global warming. It is up to the DEP to establish and enforce these protections. This is particularly imperative in view of the many rollbacks instituted by the present federal administration.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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