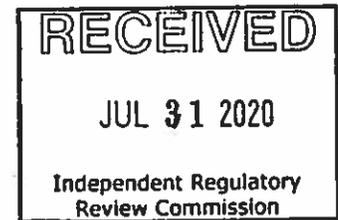


3254



July 27, 2020

Dear members of the Environmental Quality Board,

Re: Proposed Rulemaking, 25 PA. CODE CHS. 121 AND 129

We write to you in support of the Pennsylvania Department of Environmental Protection (DEP) adopting a comprehensive rule to cut methane from existing oil and gas operations and urge the administration to strengthen the draft rule by limiting the exemption for low-producing wells.

Our organizations believe in the thoughtful stewardship of Pennsylvania's natural resources. This includes protecting our air and climate, limiting waste, and ensuring that oil and gas development occurs as responsibly as possible.

Each year, oil and gas operations release more than 1.1 million tons of methane into the atmosphere. Methane is more than 80 times more powerful than carbon dioxide at trapping heat in the short-term and responsible for about 25 percent of the climate change Pennsylvania experiences today.

As the second-largest natural gas producing state in the nation, the Commonwealth has duty to Pennsylvania families and future generations to cut methane waste and pollution. Climate change can lead to strange and severe weather events such as flooding, threatening our state's proud agricultural heritage and critical wetland habitat for wildlife. Climate change can also increase the risk of vector borne diseases such as Lyme disease and West Nile, disrupt ecosystems, and lead to longer, hotter summers that worsen air pollution across the state.

The good news is that we have cost-effective solutions. Since methane is the primary constituent of natural gas, by reducing methane waste and pollution companies will generate revenue by bringing more natural gas to market. The International Energy Agency estimates that about a third of all methane pollution can be cut at no net cost, even at today's energy prices. Cutting waste also generates additional royalty revenue and ensures a fairer return to landowners.

While we welcome DEP's efforts, the current draft rule exempts upwards of 70,000 low-producing wells from requirements to conduct regular leak detection and repair. These wells are responsible for about half of all methane pollution in the state. In order to protect our climate and achieve the climate goals that Gov. Tom Wolf laid out in his 2019 executive order, the DEP must limit this exemption.

Thank you for the opportunity to comment.

Very sincerely,

Ron Rohrbaugh
Director, Conservation Science and Forest
Programs
Audubon Pennsylvania

Michael Kovach
Vice President
Pennsylvania Farmers Union

David Jenkins
President
Conservatives for Responsible Stewardship

Kate Hoit
State Director
Vet Voice Foundation