

Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

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My name is Rebecca Studer and I am a resident of Pittsburgh, Pennsylvania. Thank you for the opportunity to speak at this virtual public hearing.

As I am #40 to speak today I suspect we are well reminded of the importance of this proposal for control of the release of Volatile Organic Compounds, including the greenhouse gas methane, from Pennsylvania's oil and natural gas industries. It is gratifying that our DEP is addressing and attempting to diminish the environmental burden and consequences of these emissions to exacerbate Climate Change in general, degradation of our air quality and its effects on exposed animals and plants, increase in health inequities among our peoples with respect to race and economic status, and multiple other specific adverse actions. There are several shortcomings to the Proposal as currently crafted, and we presume a consequence of these hearings will be consideration of changes to close loopholes and provide the best protections for our Commonwealth.

Although our primary residence is in Pittsburgh, we have for many years escaped to rural property in Aleppo Township in Greene County for a break from urban life, relaxation, gardening, and bee keeping. The initial years were tranquil with little traffic on the gravel road leading to the property, peace and quiet, and ostensibly clean air. However we soon realized that our land included at least two sources of Green House Gas pollution that were potentially contributing in our own small way to Climate Change with its warming temperatures, increasingly erratic weather patterns, increase in giant poison ivy plants, more disease bearing ticks on the deer that populate the hills and valleys, and degradation of the environment in general.

Our access to natural gas for heating and cooking is an old pipeline that traverses the property some half mile south of our cabin. While there seems to be little leakage where the meter and gas line to the cabin is connected, the pipeline soon crosses a small creek, where it is a frequent source of natural gas leaks. We have observed the gasses actually bubbling in the water as it escapes from the rusting pipes. We contact Columbia Gas and their maintenance workers come and repair the line. Old pipelines like this form a veritable web across this and I suspect other regions in PA. As a source of VOC and methane, they are not inconsequential. Although not large and high capacity, leaks of this nature are sources of significant pollution and add to the burden of greenhouse gasses exacerbating Climate Change. Hence the request by many of us testifying to eliminate the provision that allows fossil fuel operators to reduce their

frequency of inspections when previous inspections reveal only a small percentage of components is leaking. Research and our real, lived experience with this line, show that large, uncontrolled leaks are random and can only be detected and corrected with frequent and regular inspections.

Our second source of VOC and methane is an old conventional well that feeds into this same fragile line some distance east of the previously noted creek. It has variously been the responsibility of Chesapeake, Rice Energy, and now EQT during our time owning the land surface. It can be accessed for monitoring and repair with difficulty. The dirt 'road' leading up and over the hill and down into the valley where the well is located is being minimally maintained since the acquisition of Columbia Gas Transmission in 2016 by Trans Canada Energy, now termed TC Energy . The multiple changes in official ownership and responsibility as well as the limited access have contributed to infrequent monitoring of the well. These conditions are likely repeated in hundreds of wells in PA. These conventional wells, of which there are some 120,000 across the state, account for approximately 50% of the VOC and methane from all oil and gas sources here in PA. Excluding these traditional low producing wells from the inspections and leak control to be established by this Proposal is shortsighted, even negligent, when considered against the goal of significantly diminishing Pennsylvania's greenhouse gas emissions and providing serious protection from their multiple negative consequences.

We have confidence the DEP and Environmental Quality Board will take our comments and concerns into consideration and the current Proposal will be modified to provide maximal decreases in the release of Green House Gasses by all oil and gas facilities in the state. Thank you for your time and attention.