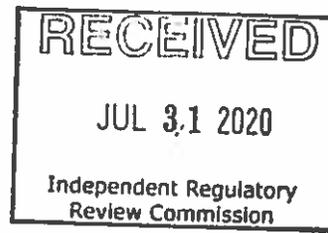


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6/23/20

MY TESTIMONY – VOC/METHANE REGULATION

My name is Michael DiMonte and I am a resident of Cranberry Township, Pennsylvania. I represent the St. Paul's United Methodist Church, Working for Justice Ministry, Clean Air Group. Thank you for the opportunity to speak at this virtual public hearing.

The climate crisis is already harming Pennsylvania residents *and industries*. Increasingly warmer temperatures from climate change cause more severe air pollution, floods and droughts, and a decreased crop yields. Pennsylvania leaders, of which the DEP is one, must take strong *and durable* actions now. It is clear that *serious consequences in the future are no longer avoidable*. We must act to *mitigate what we can*.

Agriculture is a critical large industry in Pennsylvania, and is important for the US. This industry is under a severe threat, caused by our greenhouse gas induced climate change, including the loss of essential insects. It has been reported that the insect population has dropped dramatically due to climate change, with some studies showing that the number of flying insects has dropped *by 75%* in just 25 years. This is huge, it is shocking, and will have a devastating effect on agriculture as it *worsens*.

Pollinators are among the most sensitive according to scientific studies, and these species are critical to Pennsylvania's agriculture industry. In fact, you don't need me to quote studies to demonstrate this. If you are observant, you already know that there are far fewer bugs peppering your car's windshield. This is not a good thing. Twenty years ago, there were far more. The next time you drive your car, I urge you

to notice and remember this. And remember how critical insects are to the basic functioning of our ecology. Pennsylvanians are depending on the DEP to protect our environment.

Regarding the proposed regulation, cutting methane pollution from the oil and gas industry is the most cost-effective way for Pennsylvania to reduce climate-warming greenhouse gases. Pennsylvania's oil and gas industry *vents and leaks* a whopping 1.1 million tons of methane each year, over 16 times more than what industry self-reports to the state, according to a 2020 analysis by the Environmental Defense Fund. This evidence *teaches us that this industry is strongly motivated to under report*, with the penalty paid by the public.

I am encouraged that the Pennsylvania DEP has proposed a rule to reduce methane *and harmful pollutant emissions* from existing natural gas infrastructure. Today I am calling on the DEP to close the same two loopholes that others have mentioned, that will leave over half of the potential cuts to methane pollution unchecked; **over half!** First, the proposed rule *exempts thousands of low-producing* wells from leak inspection requirements. Second, a loophole in the proposal would allow operators to *reduce the frequency of inspections* if a small enough percentage of equipment is found to be leaking. If the Department wants to incentivize behaviors that result in fewer leaks, than I urge you to use mechanisms which does not weaken the regulation or its enforcement. Allowing fewer inspections may please the industry, but it does so at the expense of higher emissions. This is not a hypothetical concern. The EPA report "*Leak Detection and Repair—A Best Practices Guide*" found, and I quote, "significant widespread non-compliance with [LDAR] regulations" at petroleum refineries and other

facilities. EPA observed: "Experience has shown that *poor monitoring rather than good performance* has allowed facilities to take advantage of the less frequent monitoring provisions." The report recommends consistent frequent monitoring. *And remember* my earlier observation, this industry has already *taught us that they seriously under report*. There are other methods to recognize good performance.

As the third-largest greenhouse gas polluting state in the nation, Pennsylvania bears an outsized responsibility to address climate change. We must recognize and act not only in our self-interest, but also as a responsible member state of our country.

Thank you for considering my testimony.