

Tom Hoffman Public Hearing for EQB Proposed Rulemaking – Control of VOC Emissions for Oil and Natural Gas Sources 7115 Willard Street Pittsburgh, PA 15208 tghoffman2@gmail.com June 25, 2020 Independent Regulatory Review Commission

Let's get into it... What a year... and it's only half done. Economic collapse. COVID 19. Urgent warnings from scientists that we may have only six months to make a drastic change to avoid climate catastrophe. Police injustice against black and brown people. On the positive side we've seen recently millions of people take to the streets declaring that "black lives matter". But these demonstrations have gone just beyond demanding changes in policing. The demonstrators and the pandemic are challenging us as a nation to rethink how we do just about everything.

I saw a recent post on Facebook.

World: There's no way we can shut everything down in order to lower emissions, slow climate change and protect the environment. **Mother Nature:** Here's a virus. Practice.

So apparently it is possible to take the warnings about emissions seriously. Now there is no question that a pandemic is not the preferred way to deal with tackling climate change - the harm it has visited on regular Americans - especially low income black and brown Americans - is unacceptable. As we dig our way out of the crisis we need to make sure that the folks who are hurting the most are protected and made whole. It is no coincidence that those folks are the same folks that have been and will continue to bear the brunt of the impending climate chaos.

So I would urge you to look at the decision you are faced with in a much broader context than just a narrow regulatory decision on a protective rule on methane and VOC's - which is critically important for sure - but rather think about those demonstrators in the street asking us to do things differently, in a way that protects the health of all Pennsylvanians - think BIG. There are two very specific steps you can take that can make a difference and would be a good place to start:

- 1. Include inspections and repairs of wells producing lower amounts of oil and natural gas. -These low-producing wells are responsible for more than half of the methane pollution from the oil and gas industry in Pennsylvania.
- Eliminate the part of the draft rule that allows oil and gas operators to reduce the frequency of inspections if previous inspections do not reveal significant methane leaks. -Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections.

These are important and you need to do these two steps but remember - think BIG. Think about how can we change things to make a better world for everyone.

When I first moved to Pittsburgh in 1980, I could XCountry ski in Homewood Cemetery near my house just about every night in the winter months. I can count on one hand the nights there has been enough snow in the last two or three years. When I take my morning walk I am horrified to see all the trees - especially my favorites the oaks - that are dying because of disease and climate change. This is not a light at the end of the tunnel it is a train headed right for us. So again, please think BIG when you make your final rule.