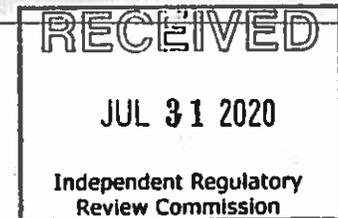


3254

Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, July 27, 2020 1:34 PM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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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:

Vera Scroggins
Citizens for Clean WAter (veraduerga@gmail.com)
71 Gus Park Lane
Brackney, PA 18812 US

Comments entered:

Methane leaks, especially on the well-end of the supply chain, are often accompanied by other volatile organic compounds (VOCs). Many are suspected or known to cause cancer in humans, have been associated with birth defects and threats to pregnancy, and can cause damage to the liver, kidney, the central nervous system. They also contribute to ground-level ozone or smog that can worsen respiratory diseases and increase the risk of heart disease and heart attacks. For these reasons, I support and applaud this rule for reducing methane and harmful air emissions. However, I think that it needs the following improvements:

-Low-producing wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania. Close the loophole that exempts low-producing wells from the rule's leak detection and repair requirements.

-Require routine inspections for all wells, regardless of production level. Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections. Eliminate the provision that allows operators to reduce the frequency of inspections if previous inspections do not reveal significant methane leaks.

-Ensure this proposal includes requirements for all the emission sources covered in DEP's existing standards for new oil and gas sources. There is no logical reason why all of the natural gas infrastructure covered by new sources should not also apply to existing sources. don't allow

methane bleeds at pipelines and pig assemblies near homes and schools. allow for capture mechanisms in place.
thank you.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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