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Form Letter: Comment on Methane Emissions Rule

Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

The proposed rulemaking to limit climate-warming methane pollution and harmful volatile organic compounds from existing oil and gas operations marks great progress in Pennsylvania's efforts to curb climate pollution and protect public health. However, the proposal currently contains loopholes that must be addressed.

First, please close the loophole that exempts low-producing wells from the rule's leak detection and repair requirements. These wells, despite not producing much gas, are responsible for more than half the methane pollution from oil and gas sources in Pennsylvania. All wells have equipment failures and therefore require on-the-ground leak inspections.

Second, please eliminate the rule provision that allows operators to reduce the frequency of inspections merely because past inspections did not reveal significant methane leaks. We've seen from other states and the latest research that large, uncontrolled leaks can occur at any time. Frequent, consistent inspections are the only way to identify them before they do major damage to our communities and the environment.

Comprehensive regulation on methane will send a signal to investors, the country, and the world that Pennsylvania can advance long-term climate solutions in a way that both protects our communities and makes good business sense. Please protect our health and climate by strengthening and removing loopholes from the proposed methane rule released earlier this summer.

