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Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, August 7, 2020 12:49 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-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 1 - Proposed #7-544
Testimony date: 6/23/2020 12:00:00 AM
Testimony location: WebEx

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:

Cricket Hunter
Pennsylvania Interfaith Power & Light (chunter@paipl.org)
210 W. Hamilton Ave #295
State College, PA 16081 US

Comments entered:

No text comments were provided as part of this comment submittal. Please refer to attachments below.

These links provide access to the attachments provided as part of this comment.

Comments Attachment: [Hunter testimony DEP Methane rule.pdf](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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Communities of faith responding to climate change AUG 11 2020

Independent Regulatory

Testimony to the Air Quality Board of the DEP
Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

Thank you to those of you who are here to listen and record testimony tonight, to those who figured out how to do the virtual hearings, and to those who have participated in outlining and refining this proposed rulemaking. I hope that you and your families are well.

Because this is the last step on a very long path, you already know what Pennsylvania Interfaith Power & Light (PA IPL) has to say about the rule:

1. We are so glad that the rule for existing sources is finally here. Existing sources are, after all, the source of 100% of the existing pollution from oil and gas operations in this state.
2. The rule, as proposed, will do some important work cutting emissions from large operations. We ask that you amend the rule to close the massive loophole for emissions from smaller operations because neither bodily systems nor ecosystems care about the size of the source.
3. The rule, as proposed, requires inspections. That is good. We ask that you amend the rule to require ongoing inspections even after repeated passing grades. It is too easy for leaks to go undetected, and many leaks occur unpredictably. Without regular, required inspections, leaks could go on for far longer, polluting our air and atmosphere much, much more, even when people are trying to do the right thing.
4. This rule is a good start, but it does not yet limit methane directly. VOCs are not co-emitted with methane at the same rates across the state. We agree that we need to limit methane emissions (this rulemaking is specifically named as part of the Methane Reduction Strategy). When this rule—this good start—is tightened and completed, we need you to move onward to direct methane surveillance and limits.

You have seen the Pennsylvania Climate Change Impacts Assessments. You know that climate change is here and now, not theoretical nor eventual. You know it impacts infrastructure, water systems, and agriculture across the state, as that was the focus of the 2020 report. You know, too, of increasing heat and humidity in various parts of the state, the impact of which is only compounded in hotspots like Hunting Park, which can be up to 20 degrees hotter than surrounding neighborhoods — where community members don't have the resources to run air conditioners, and heat is a direct threat to our elders.

Those points are all specific to this rulemaking. They are things you know, they are things we have said before, and they are things that others will detail in depth. So this evening, I'd like to take us in a different direction. I would like to invite you to bring your whole selves into this space. You are, after all, more than just your expertise.

Whether or not we identify with a particular faith tradition we know, each of us, foundationally, morally, and in our bones that people are not disposable. When we stop to think about those things that are most important to us, when we pause for gratitude and Thanksgiving, it is the *people* who have cared for us, celebrated with us, challenged us, and stuck by us, it is the *places* where we have laughed, and sung, and healed – these are the “things” for which we give thanks. These are the “things” that weave us together. People and places fill us and feed us as profit and stuff never will. Americans know this. Pennsylvanians know this.

We know people are not disposable, and we know that our Common Home is not disposable – we know that the web of life is, in fact, a web of interconnection.

We know real community.
I know, and you know.

Unfortunately, at work, there are a lot of scoresheets, and the way we keep score doesn't have this knowledge of heart and soul the way you do, and I do, and the way the residents of our Common Wealth do. So we need rules. And that rulemaking is your job. Tonight, I'm asking you to hear it as a calling.

I am asking you to use your expertise, *and* to bring your whole self. Write the rules that truly protect what matters. In doing your work, love our places. Love our people. Love our children's futures, and their grandparents' longevity. Write the rules we need. Here at PA IPL we see that all policy is a covenant with the future.

I am asking each of you, and each one of your colleagues: on Friday morning, after the last of these hearings, take your whole selves to work and love us all. Write the covenant we need. Do it for your family, and for mine, for our Common Home, and all who live here.

Close the loopholes. Raise the bar. Write a good covenant. Finish this one, and write the next.

Testimony given virtually via WebEx on June 23, 2020

Cricket Eccleston Hunter

Director of Program, Pennsylvania Interfaith Power & Light

paipi.org