

325p

**Kathy Cooper**

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**From:** ecomment@pa.gov  
**Sent:** Friday, August 7, 2020 12:49 PM  
**To:** Environment-Committee@pasenate.com; IRRRC; 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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**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

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:

Nora Nash  
Sisters of St Francis of Philadelphia (nnash@osfphila.org)  
609 S. Convent Road  
Aston, PA 19014 US

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Comments entered:

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

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

Comments Attachment: [Nash Public Hearing 6-24-2020.FINAL.docx](#)

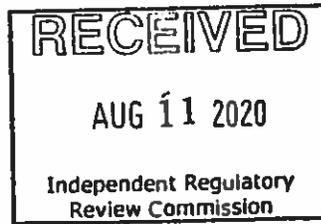
Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Jessica Shirley  
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PA Department of Environmental Protection  
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June 24, 2020

**Department of Environmental Protection (DEP)**

**Control of VOC Emissions from Oil and Natural Gas Sources**

Sr. Nora M. Nash, OSF  
[nnash@osfphila.org](mailto:nnash@osfphila.org)

Good afternoon, I am Sr. Nora Nash of the Sisters of St. Francis of Philadelphia. I represent my congregation, a community of Franciscan women whose charism calls us to be strong proponents of climate, environmental, and racial justice. We accept our moral responsibility to protect our environment, speak for the human rights of communities, human health and the over-all “common good” of society.

As a resident of Delaware County, I appreciate this opportunity to address the Pennsylvania Department of Environmental Protection (DEP) regarding its intent to Control VOC Emissions from Oil and Natural Gas Resources. From production and processing to storage and transportation, methane and VOC’s leak at every stage of the fracked gas supply chain and a recent analysis by the Environmental Defense Fund (EDF) found that Pennsylvania’s oil and gas sector emitted 1.1 million tons of methane annually—16 times more than what the industry itself reports.

The proposed rulemaking to limit climate-warming methane pollution and harmful volatile organic compounds from existing oil and natural gas operations is essential to the state’s responsibility to curb the climate crisis, the coronavirus as well as protect the human rights and health of its 12 million plus residents. The problem is actually worse than previously understood since there are salient and systemic financial risks posed by climate change and the coronavirus. Delaware County is one of the last counties to meet some of the State’s requirements to exit the lockdown phase (this Friday) and we will still be required to wear masks. The experience of the pandemic provides a warning of the impending public health and economic challenges that accompany continued unchecked planetary warming. Unless we can significantly reduce emissions now, human-induced warming poses an existential threat with catastrophic consequences.

Unfortunately, the proposal currently includes loopholes that would leave over half of all potential cuts to methane pollution from the industry unchecked and exempts thousands of low-producing wells from leak inspection.

Pennsylvania needs to adopt a strong final rule if it is to achieve Governor Wolf's climate goals to reduce greenhouse gas emissions by 80% by 2050 (compared to 2005 levels). Recognizing that our state is the second-largest gas producing state and the third largest greenhouse gas polluting state in the nation, we bear an ecological and social responsibility to address the issue.

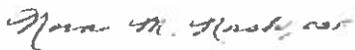
I appreciate this opportunity to suggest that the DEP address these additional changes in the proposed rule:

- Do not exempt low-producing wells from the leak detection and repair requirements since these wells are responsible for excessive methane pollution from oil and gas sources. Routine inspection should be required on ALL wells.
- The frequency of inspection is essential to the proposed rule and the industry should be required to do frequent and regular inspection since leaks occur randomly.
- Recognize that the State is lagging in using updated technology and it is time to implement technical and procedural fixes to record methane leakage.

Thank you for considering my testimony. In summary, please close the industry-friendly loopholes and adopt a strong final rule that helps meet our state's climate goals and tackles the climate crisis, the coronavirus and environmental and racial issues.

“Control VOC Emissions from Oil and Natural Gas Resources” is an important step in reaffirming Article 27 of our State Constitution which Governor Wolf is charged to protect.

Respectfully submitted,



Nora M. Nash, OSF

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