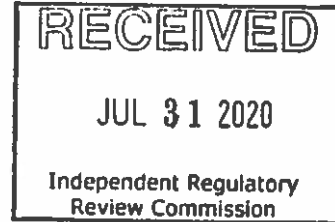


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## **Testimony for Control of VOC Emissions from Oil and Natural Gas Sources**

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The Responsible Drilling Alliance (RDA), a coalition based in Lycoming County, appreciates that the Environmental Quality Board is addressing health problems and climate change while keeping in mind the interests of current and future Pennsylvanians, as is your constitutional obligation. While we support this rulemaking, we believe it does not go far enough. In this limited time we will only address one particular issue, the exemption of compressors on well pads.

To understand the impact these very large industrial machines may have on nearby residents, some potentially as near as 200 feet away, RDA spoke with residents whose Wyoming County home is approximately 500 feet from a well pad compressor.

Even at that distance, the size and noise are imposing. If you have seen the huge fans on side of a compressor station you can imagine the bulk of this equipment. The following statements were made by the lessor/homeowners about the compressor's impacts:

"It runs constantly, except for when it malfunctions and shuts down, usually with loud and long pressure releases."

"When the wind blows we get an exhaust smell."

"There is a glycol dehydrator component to it, when it malfunctions, we get that burning glycol smell."

"We can hear it most all the time we are outside, we can feel it inside some of the time, but all of the time we wonder, what we are breathing?"

In "Gorsline vs Board of Supervisors of Fairfield Township", a Lycoming County zoning case about fracking in a residential community eventually reached the Pennsylvania Supreme Court. There an attorney for the operator stated, at oral argument, that a producing well "is a land use that is passive, low-impact in nature." Later she characterized it as, "a passive well that has no activity." These assertions were accepted without question.

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This type of lying, or mouthpiece ignorance at best, was pervasive and is what has led us to where we are now: At the beginning of the decline of the “play” in the vast majority of the overall area of the Commonwealth where it occurred. Production data is well established, the top 7 counties out of 28 consistently produce what we calculate as around 88% of all Pennsylvania gas. Lycoming County data shows only a handful of townships produce the overwhelming majority of the gas here with 3 townships out of 23 gas producers accounting for 60% of all the gas produced, 6 townships for 80%. In neighboring Wyoming County 4 of the gas producing municipalities have been responsible for somewhat more than twice the amount of gas as the remaining eight producers. It is apparent that across the commonwealth hundreds, if not thousands of wells have been developed that were unable to be profitable for investors, yet still highly lucrative for a time to their developers. The result is now other entities are moving in perhaps to repeat the cycle while proliferating well pad compressors.

We ask why the EQB is enabling harms to present and future Pennsylvania citizens by this exemption from the

rulemaking's VOC emission controls? Please explain, as we are concerned this significant exemption enables ephemeral economics that drive industrial activity that will result in significant short and long-term harmful emissions. We believe such an exemption will lead to a loss of quality of life and property values for more Pennsylvanians. Where is the wisdom in threatening a family's health for what is arguably of marginal, or even negative, overall economic consequence? In so doing, we believe that as Board members you are not living up to your constitutional duty.

Thank you for the opportunity to comment.

Sincerely,

The Board of Directors of the Responsible Drilling  
Alliance

Robert Cross, President

Barbara Jarmoska

Jon Bogle

Mark Szybist

Roscoe McCloskey

Dianne Peeling

Harvey Katz

**129.126. Compressors**

(d) *Exemptions.* Subsections (b) and (c) do not apply to the owner or operator of a reciprocating compressor or a centrifugal compressor that meets the following:

(1) Is located at a well site.

(2) Is located at an adjacent well site and services more than one well site. 9 pg 31

*(b) VOC emissions control requirements for a reciprocating compressor.* Except as specified in subsection (d), beginning \_\_\_\_\_ (*Editor's Note: The blank refers to the date 1 year after the effective date of this rulemaking, when published as a final-form rulemaking.*), the owner or operator of a reciprocating compressor subject to this section shall meet one of the following...

*(c) VOC emissions limitation and control requirements for a centrifugal compressor.* Except as specified in subsection (d), the owner or operator of a centrifugal compressor subject to this section shall perform the following...