

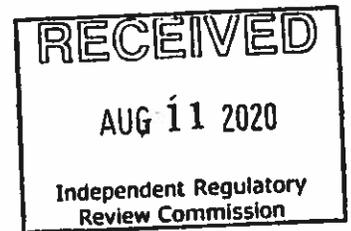
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**Kathy Cooper**

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**From:** ecomment@pa.gov  
**Sent:** Friday, August 7, 2020 12:49 PM  
**To:** Environment-Committee@pasenate.com; IRR; 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 3 - Proposed #7-544  
**Testimony date:** 6/25/2020 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:

Barbara Clifford  
(bclifford49@gmail.com)  
374 Prospect St.  
Montrose, PA 18801 US

Comments entered:

When I heard that the DEP was proposing controls on VOC emissions from oil and natural gas sources, I felt the sense of relief that finally, we might be getting some needed attention on the unwanted changes in our air quality, and that the public would have an opportunity to comment. In Susquehanna County in Northeast Pennsylvania, we are designated by the state as the Endless Mountains Heritage Region and described historically as an agricultural region. As a rural area, we are vulnerable to the health effects of emissions from the oil and gas industry, partly because the state has so far not really done an adequate job of regulating it. And because being in the upstream part of the industrial process, we are exposed to the greatest volume of unprocessed spikes in the emissions, many of us, including myself, living within a mile of the source. Individual permits for compressor stations and well pads do not adequately account for the cumulative exposures to me, my family, and neighbors who live nearby. My family and I are

surrounded by well pads with increasing numbers of wells, and a compressor station within, as the crow flies, close to a mile to our homes and farm, and directly in the path of the prevailing winds. VOCs like benzene not only cause acute health issues, but are also precursors to ground level ozone. Ground level ozone risks not only the health of our community, but regional communities downwind of our county as ground level ozone can travel 200 miles. Heart disease and emphysema is exacerbated by ozone pollution.

I have always been healthy, take no medications, eat and live a healthy life. But in recent years, I have developed increasing heartbeat irregularities, atrial fibrillation. On top of that, I now have emphysema, COPD. It didn't make sense to me. How could it be happening? What is the cause? Then I learned about the health impacts of ground level ozone. Could it be possible that the oil and gas pollution is the cause of my health conditions? It is alarming that AFIB has become so common in our area where we now have these chemical emissions. There was a scientific medical study done that showed a chemical used by the industry that is trigger for AFIB. And a recent Binghamton University study showing the death of four Pennsylvanians are linked to pm 2.5 pollution during well preparation, drilling and fracking.

There is anxiety here about oil and gas emissions, and what you are proposing is very important, and I really thank you. Climate change is causing extreme weather that is wreaking havoc to the world's agriculture. And in turn, Pennsylvania's food - food security with the Midwest and Western states in peril of droughts and loss of land and mudslides, Pennsylvania is a natural to invest in agriculture again.

Our farm, like many others in this area, has been in operation since the late 1800s. Some with organic certification worry about these climate change impacts in addition to air and water pollution from the oil and gas industry. Rules like this one, if done correctly, could reduce pollution and help curb climate change.

I realize this sounds idealistic, but we have to keep up, keep our hope alive in this crazy world. To better protect my health and that of my children, grandchildren and great-grandchildren, and reduce impacts from climate change on my farm and others in Pennsylvania, I implore DEP to improve its proposed rule by removing industry loopholes.

Please remove from the rule the loophole that would exempt low producing wells from leak detection and repair requirements. Also, DEP should take out the provision that allows operators to reduce the frequency of inspections if previous inspections do not reveal significant methane leaks. Last, DEP should include requirements for all emission sources included in the already adopted standards for new oil and gas sources, GP5 and GP5(a). These loopholes undermine the purpose of the control because they allow half of the methane emissions to be emitted - emitted from control.

And I just want to add one last thing on the - where did I put it? Oh, on the exemption from leak detection and repair regulation on low producing wells. If you do that, you'll eventually have all our wells unprotected if they're all exempt because all our wells become low producing. So that is the end. Thank you very much.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Jessica Shirley  
Director, Office of Policy