

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Tuesday, June 23, 2020 11:45 AM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov
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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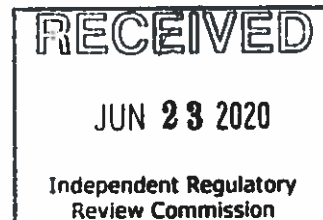


Re: eComment System

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:

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Comments entered:

The attached comments are respectfully submitted by 350 Pittsburgh climate action group.

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

Comments Attachment: [DEP CH4 Comment.pdf](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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Comments on Proposed Rulemaking

Control of VOC Emissions from Oil and Natural Gas Resources

I present these Comments on behalf of the Steering Committee of 350 Pittsburgh, a climate action group concerned about the growing climate emergency.

350 Pittsburgh welcomes the proposed move by the Department of Environmental Protection to control and significantly reduce the emission of volatile organic compounds from wells and other gas facilities. Not only are Volatile Organic Compound emissions injurious to public health, but they also contribute to global warming. Of special concern is the emission of methane which, with a life cycle in the atmosphere of twelve years, is by far the largest component of the VOC emissions from these sources.

In January 2019 Gov. Wolf set a climate goal of reducing greenhouse gas emissions by 26 percent by 2025. According to the latest DEP GHG Inventory the emissions from natural gas production, transmission, and distribution amounted to 11.80 MMTCOe in 2015. To achieve the Governor's goal for 2025 will require a reduction of 3.07 MMTCOe, far more than is expected to be gained by the draft VOC emissions rule.

350 Pittsburgh therefore urges the EQB to recommend that the Department revise the draft rule along the following lines:

- *The suggestion that the 8,403 unconventional oil and gas wells that are in production, along with transmission compressor stations and natural gas processing facilities, MAY be subjected to the draft rules creates uncertainty. Instead, subject ALL these wells and facilities to the draft VOC emissions rule.*
- *Extend the draft VOC emissions rule to the complete oil and gas supply chain.*
- *Ensure that the oil and gas wells and facilities are inspected on a regular and frequent basis by Department inspectors, and all recorded infractions of the VOC emissions rule are remedied.*

Peter J. Wray
Steering Committee Member
350 Pittsburgh Climate Action Group
June 18, 2020

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