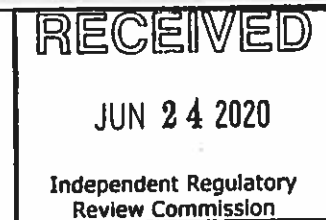


**From:** ecomment@pa.gov  
**Sent:** Wednesday, June 24, 2020 6:12 PM  
**To:** Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: 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:**

Nancy Harkins  
(nancyharkins651@gmail.com)  
1521 WOODLAND RD  
WEST CHESTER, PA 19382-7835 US

**Comments entered:**

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

My name is Nancy Harkins and my husband and I live in Westtown Township, Pennsylvania. Thank you for considering my comments.

I am very concerned with the continuing contamination of air quality in Pennsylvania and the devastating consequences to human health. We have the dubious distinction of leading the nation in premature deaths due to air pollution and we are exporting our contaminants to neighboring states. Now is the time for aggressive action if we are to avoid the worst impacts of climate change including extreme weather events, even worse than we are already experiencing. As the second-largest natural gas producing state in the nation, Pennsylvania has a moral obligation to step up and be a national leader in reducing harmful methane and air pollution from existing sources. In addition, as the third-largest greenhouse gas polluting state in the nation, Pennsylvania bears an outsized responsibility to address climate change.

There is overwhelming scientific evidence of the harm from fracking and methane. You don't need me to quote you chapter and verse on the attributes of methane and all the studies that prove it is responsible for 25 percent of the climate change we're already experiencing

worldwide. Or that over a 20-year timeline, methane is 87 times more potent than carbon dioxide at trapping heat in our atmosphere.

You don't need me to tell you that Pennsylvania's unscrupulous oil and gas industry vents and leaks a whopping 1.1 million tons of methane each year, over 16 times more than what industry self-reports to the state, according to a 2020 analysis by the Environmental Defense Fund. The annual climate impact of this pollution is double the impact of tailpipe emissions from all cars in Pennsylvania combined.

You already know this and more and you already know that without adopting a strong final rule, Pennsylvania cannot achieve Governor Wolf's climate goals to reduce our greenhouse gas emissions 80 percent by 2050 . Achieving these goals will ensure Pennsylvania does it's part to reduce its disproportionate contribution to the climate crisis. In the face of rollbacks of oil and gas methane rules by the Trump administration, Governor Wolf taking action to adopt the strongest possible methane rule in Pennsylvania is more critical than ever. There can be no caving to the dying oil and gas industry.

I urge the Department to make the following improvements to the proposed rule:

- 1) Close the loophole that exempts low-producing wells from the rule's leak inspection requirements.
- 2) Eliminate the provision that allows operators to reduce the frequency of inspections if previous inspections reveal that only a small percentage of components is leaking.
- 3) Ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources.

You already know that cutting methane pollution from the oil and gas industry is the quickest, most cost-effective way for Pennsylvania to reduce climate-warming greenhouse gases. These loopholes will not enable us to achieve the significant reduction required. Please fulfill your mission to protect the health and safety of Pennsylvania citizens through a cleaner environment. It is imperative that you adopt a strong, common sense rule to reduce methane and harmful pollutants from existing natural gas infrastructure. Our children's lives are depending on it. Thank you.

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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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