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JUN 27 2020

Independent Regulatory

**Review Commission** 

## Stephen Hoffman

From:

ecomment@pa.gov

Sent:

Saturday, June 27, 2020 5:02 PM

To:

Environment-Committee@pasenate.com; IRRC; 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:

Stephanie Ulmer (ulmer.stephanie.marie@gmail.com) 427 Elmer St. Pittsburgh, PA 15218 US

## Comments entered:

Please strengthen the current draft o this proposal and then pass it.

According to a much cited May analysis by the Environmental Defense Fund natural gas operations in PA emitted more than 1.1 million tons of methane in 2017, 16 times the amount the industry reported to the state. This fact alone tells us that industry is not credible when it promises to ensure the effective and safe management of methane and other emissions. Also if industry finds these regulations too costly, then perhaps they can't afford to be in business. A restaurant can't say that it is too costly to maintain a clean food preparation environment for example.

Also, this draft rule includes a loophole for low-producing wells. These kinds of wells are responsible for about half of all PA methane emissions. It is essential that both this loophole be closed as well as adequate funding for the enforcement of these proposals be included in the regulations.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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