

#3256

**Stephen Hoffman**

**From:** ecomment@pa.gov  
**Sent:** Thursday, July 16, 2020 11:28 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)

CAUTION: \*\*EXTERNAL SENDER\*\* This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

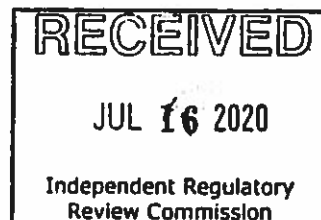


**Re: eComment System**

**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:

Joseph Harrick  
JKLM Energy, LLC (jharrick@jklmenergy.com)  
2200 Georgetown Drive Suite 500  
Sewickley, PA 15143 US



Comments entered:

To Whom It May Concern:

I am writing to provide comments on behalf of JKLM Energy regarding the Environmental Quality Board's proposed rulemaking #7-544 – Control of VOC Emissions from Oil and Natural Gas Sources. We support the technical comments from the Marcellus Shale Coalition.

JKLM Energy is an independent oil and natural gas exploration and production company with a highly experienced technical staff based in Franklin Park, PA and Coudersport, PA. JKLM Energy has a leasehold position of over 120,000 acres located solely in Potter County, PA. We develop wells in the Burkett, Marcellus, and Utica formations. JKLM Energy proudly and responsibly produces clean natural gas to meet the nation's growing energy demand while helping to make America energy independent. JKLM Energy is committed to protecting the environment, creating jobs, and maintaining positive relationships in the communities in which we operate.

Pennsylvania has a rigorous program of environmental regulation of all aspects of unconventional gas well development. The State Review of Oil and Natural Gas Environmental Regulations – an independent, non-profit regulatory review commission – has given our oil and gas program high marks. Furthermore, the program serves as reference for other state

regulatory agencies.

Pennsylvania's regulatory environment, voluntary efforts by the natural gas industry and increased utilization of natural gas have contributed to improved air quality. Total VOC emissions decreased by 56% between 1990 and 2017. Total NOx and SOx reductions during this timeframe were 84% and 92%, respectively. In the power generation sector, where natural gas use has increased significantly, NOx and SOx reductions between 2005 and 2017 amount to 80% and 93%, respectively. VOC emissions from the sector declined by 33% during this timeframe. Of particular interest, production-based methane emissions intensity, expressed as metric ton CO2 equivalent /barrel of oil equivalent, declined in the Appalachian region between 2011 and 2017 by 82%. Furthermore, CO2 emissions from Pennsylvania's power sector decreased by 35% between 2010 and 2017. These air quality improvements have saved countless lives and significantly reduced respiratory-induced hospitalizations while providing billions of dollars in public health benefits to the citizens of Pennsylvania.

I strongly encourage you to base your decisions on facts while recognizing and continuing to encourage and facilitate the significant technological advances of the natural gas industry in Pennsylvania. Any final rule on this matter must be cost-effective and provide a reasonable compliance schedule for affected facilities.

Thank you for your consideration.

Joseph M. Harrick  
General Manager, Environmental Health and Safety

---

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

---

Jessica Shirley  
Director, Office of Policy  
PA Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Office: 717-783-8727  
Fax: 717-783-8926  
ecomment@pa.gov