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Independent Regulatory Review Commission

Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

Public Comments, oral and written testimony (#49)

June 24, 2020

Pennsylvania needs the Department of Environmental Protection to abide by its mission statement,

Protect clean air, clean water, and public health and conserve working farms, forests and natural lands.

In order to do this, PA DEP must finalize the most protective methane and volatile organic compound rule cutting air pollution from existing oil and gas operations, thus safeguarding the health of Pennsylvanians and the climate.

As a resident living in the "frack-zone" of Washington County, I strongly urge the state to adopt comprehensive methane and VOC protections including for all wells, even those producing lower amounts of oil and natural gas. Some low-producing wells are responsible for large amounts of methane and VOC pollution from the natural gas industry in Pennsylvania.

It is also imperative that the PA DEP maintains quarterly inspections on a regular basis for all oil and gas sources. Uncontrolled releases happen at any time- no exceptions. Reducing the frequency of inspections simply because previous inspections did not reveal significant leaks is unacceptable and dangerous! Leaks happen especially as metals and valves degrade. We don't stop bridge inspections simply because they have passed prior inspections. People's safety is at risk if we do this. The same should be true for gas well site inspections. These are heavy industrial sites and should be treated as such so to assure protection of those that live and work around them.

My home is completely surrounded now by Marcellus gas development including unconventional gas wells, pig launchers/receivers, frack ponds, cryogenic and fractionation processing plants, compressor stations and hazardous liquid gas pipelines next to our farm.

We worry about the air we breathe now that Marcellus shale development has come to town. We are very concerned about being constantly exposed to pollutants from the well pads surrounding us. My area has seen an increase in rare childhood cancers such as Ewing Sarcoma. We are also concerned for the effects the emissions are having on the environment and its contribution to climate change. We have seen an increase in the tick population and Lyme's Disease cases including in children and pets. Earlier this month, my youngest son fell very ill and his pediatrician confirmed that he got Lyme's Disease. The Marcellus operations surrounding us were permitted by the PA DEP with a level of trust from the public that the state is overseeing the industry's safety through the use of comprehensive regulations and frequent inspections, not limited regulations and declining inspections!

Quite frankly, the public is expecting the PA DEP to protect them given that this agency granted permit approvals for natural gas operations so close to where people live, work and play.

DEP would not be doing their due diligence if they reduce the types of natural gas wells to inspect and reduce the frequency of inspections.

Allowing the oil and gas industry to self-regulate for emissions is troublesome. You have heard repeatedly about a recent analysis by the Environmental Defense Fund that shows the methane emissions in Pennsylvania are estimated to be 16 times higher and VOCs are estimated to be 21 times

what is reported to the state. In April 2020 it was reported that Range Resources-Appalachia LLC misrepresented to the state the levels of emissions coming from well pads in Mount Pleasant and Cross Creek townships of Washington County. Range's self-reported emission levels were much lower than the PA DEP discovered. These massive releases of VOCs occurred at small, low producing well pads over three years (2013,2014,2015). Yet, we learned about this in 2020.

It is clear that comprehensive regulations are needed and Pennsylvania residents deserve better.

In addition to the many unconventional oil and gas wells emitting methane and VOCs in the state, we still have an abundance of orphaned conventional wells that are unplugged and could be leaking, adding even more emissions to Pennsylvania.

Please do not repeat the pattern of the past by underregulating and under-inspecting the shale gas industry.

Do not allow this industry to take the PA DEP out of the oil and gas development equation!

Thank you!

Sincerely,

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