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

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Independent Regulatory
Review Commission

My name is Joy Bergey, and I'm testifying today as the director of the Environmental Justice Center of Chestnut Hill United Church. We're located in Philadelphia.

As a society, we face a moral imperative to move as quickly as possible to wean ourselves off fossil fuels and the damage done by their extraction, transport, and burning. To that end, we applied the Department of Environmental Protection for proposing this rule to reduce the leakage of methane and harmful pollutants from existing natural gas infrastructure.

Pennsylvanians already suffer the impacts of climate change from our addiction to fossil fuels. And methane, the largest component of natural gas, is 80 times more potent than carbon dioxide in heating the climate in the first 20 years after its release to the atmosphere.

In April the American Lung Association gave Philadelphia, where our church is, a failing grade for air quality. Air pollution, including methane and VOC pollution from leaking gas infrastructure, damages human health – and disproportionately hurts black and brown people, who because of their higher instances of systemic poverty, are less able to get out of harm's way. Their neighborhoods suffer worse air quality and higher rates of asthma, other respiratory diseases, and cancer -- the very diseases that are also increasing the likelihood that these residents will become sicker or die from Covid-19, a further injustice.

We present this testimony prayerfully on behalf of these Pennsylvanians who suffer disproportionately. We urge two amendments to the draft rule:

- Closing the loophole that would exempt low-producing wells that are responsible for more than half of the methane pollution from gas sources in our state.
- Eliminating the possibility of allowing operators to reduce the frequency of inspections just because significant leaks had not been revealed in previous inspections. A vehicle owner isn't allowed to skip annual inspections because

their car passed prior inspections without problems; why should well owners be granted this privilege?

The Environmental Justice section of DEP's website says, "It is our duty to ensure that all Pennsylvanians, especially those that have typically been disenfranchised, are meaningfully involved in the decisions that affect their environment and that all communities are not unjustly and/or disproportionately burdened with adverse environmental impacts." We agree.

So this can be a powerful moment for justice, when DEP uses its authority to cut methane and air pollution from existing gas infrastructure. By doing so, the Commonwealth will ensure a more stable climate future and better health for Pennsylvanians, especially for those who suffer environmental injustice through no fault of their own.

We prayerfully ask Secretary McDonnell and the Department to implement the proposed rule, incorporating our suggesting amendments. Thank you.