



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

My name Steve Hvozdoch, I'm the Pennsylvania Campaigns Director for Clean Water Action a non-profit environmental organization with over 80,000 members statewide.

We applaud the Pennsylvania Department of Environmental Protection moving forward with their proposed regulation to control emissions from existing oil and gas operations and the potential benefits it'll bring by reducing annual air pollution by 4,400 tons of VOCs and 75,600 tons of methane.

The devastating impacts of climate change are beyond dispute. A report by Penn State University scientists warn the projected impacts to Pennsylvania will likely included warmer temperatures throughout the 21st century, more frequent and intense storms, including flooding, and longer dry periods, including droughts. The United Nation's Intergovernmental Panel on Climate Change recommended that we eliminate greenhouse gas emissions by 2050 if we want to avoid impacts like these and even more disastrous ones.

Methane, the main component of natural gas, is a greenhouse gas that is 86 times more damaging at trapping heat in the atmosphere than carbon dioxide. Pennsylvania's oil and gas industry emitted a million tons of methane in just 2017 and studies have revealed that methane emissions from oil and gas plants are even higher than what industry is reporting to the government. As the third largest greenhouse gas polluting state in the nation, Pennsylvania bears an outsize responsibility for addressing our climate crisis.

Given the extent of the methane problem in our Commonwealth we must do all we can to get this under control. That means strengthening the regulation by closing loopholes to ensure all sources of methane are covered.

The proposal as currently drafted includes exemptions for low producing natural gas wells which that would leave roughly 70,900 of the Commonwealth's 71,229 conventional gas wells uncovered. Research has shown that these low-producing wells can actually emit just as much methane or more than higher producing wells. When aggregated the emissions from these wells also generate a significant amount of emissions. In the interest of limiting climate-damaging methane emissions, this exemption must be removed from the proposed rule.

There's also a provision that allows operators to shirk their responsibility to inspect their equipment frequently just because previous inspections did not reveal significant leaks. Continued vigilance and monitoring is the only way we can ensure there are no breakdowns which would threaten the intent of these regulations. Thus, this exemption should also be eliminated from the proposed rule.

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We can't leave potential sources of methane off the table if Pennsylvania is going to be a leader on climate change and meet its commitment of reducing greenhouse gas emissions 26% by 2025 and 80% by 2050, from 2005 levels. Especially when we know a rapid reduction is something that we can do immediately to help curb the near-term rate of warming.

We will be remembered for how we used this opportunity to make an impact on climate change. We must demonstrate environmental leadership by strengthening and finalizing as soon as possible regulations to mitigate methane from existing oil and gas operations.

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