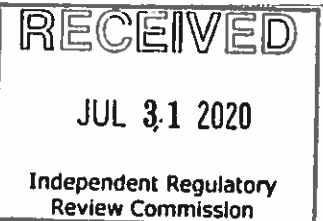


3254

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, July 24, 2020 11:06 AM
To: Environment-Committee@pasenate.com; IRR; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
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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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 3 - Proposed #7-544
Testimony date: 6/25/2020 12:00:00 AM
Testimony location: WebEx

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:

Garrett Wassermann
(gwasser@gmail.com)
1526 Vance Ave.
Coraopolis, PA 15108 US

Comments entered:

Verbal comments given 25 June 2020. See emailed written comment below:

To whom it may concern:

My name is Garret Wassermann and I am a resident of Coraopolis, Pennsylvania, just outside of Pittsburgh.

Siberia this past week experienced the first temperature over 100 degrees Fahrenheit in recorded history. Pennsylvania's status as the 2nd largest gas producer and the 3rd largest contributor to greenhouse gases in the US means that Pennsylvania's business decisions echo across the entire planet and are a large contributor to the global climate crisis. The decisions we

make today determine whether that crisis will be addressed, or get worse.

The DEP proposal identifies methane as a potent greenhouse gas "with a global warming potential more than 28 times that of carbon dioxide". Clearly DEP understands the damage caused by methane when it states on page 15 of the proposed rules that "reducing methane leaks from oil and natural gas sources is essential to reducing global greenhouse gas emissions and protecting public health."

It is therefore perplexing why this proposal seems to lack urgency. First, the draft rules would exempt inspections and repairs for wells that produce smaller amounts of gas and oil; but these so-called "low-producing wells" actually produce half of the oil and gas industry's methane emissions, so no rule will be effective without addressing smaller wells. Second, the draft rule contains another exemption allowing oil and gas operators to reduce frequency of inspections if previous inspections did not find significant leaks; but research shows most large leaks are random and therefore require consistent and frequent inspections. Both loopholes must be fixed.

But these loopholes point to a larger problem: the rules seem to be concerned more with lowering costs on oil and gas operators than protecting our planet or our Article 1 Section 27 rights to clean air and pure water under the Pennsylvania Constitution.

A recent NPR article from May 2020 discussed a study that indicated the shale gas industry leaked about seven times the methane as reported by the Pennsylvania DEP, while the conventional gas industry leaked even more methane -- as high as 15 times more than reported. These leaks are much larger and much more damaging than the proposed rules acknowledge.

Even more concerning, Reuters reported recently, on June 16th, 2020, about the growing methane threats from abandoned oil and gas wells across the country. "More than 3.2 million abandoned oil and gas wells together emitted 281 kilotons of methane in 2018", the article points out. "That's the climate-damage equivalent of consuming about 16 million barrels of crude oil, according to an EPA calculation, or about as much as the United States, the world's biggest oil consumer, uses in a typical day," it continues. The proposed rules seem to only apply to existing, operating wells. What is DEP's plan to address leaks from abandoned wells? How will oil and gas operators be held responsible, or will DEP leave the financial, health, and environmental costs to be suffered by the people of this commonwealth and the planet for the sake of boosting private profits?

Climate scientists have given us a deadline -- 2030, less than 10 years from today -- to make significant progress at reducing all sources of carbon, including methane, if we are to have a good chance at minimizing the disastrous effects of climate change. With the Arctic melting, we may have even less time. This proposed rule is not urgent enough when facing that timeline. I urge DEP to close the loopholes I described, but also to consider revisions or new rules addressing all carbon emissions in general, not just from leaks, but from the use of natural gas and oil itself. The only rule that will successfully address our health and climate is one that plugs abandoned wells, bans unconventional "fracking", and promotes an urgent transition away from oil and gas and to renewable energy sources over the next decade.

Garret Wassermann

References:

<https://stateimpact.npr.org/pennsylvania/2020/05/14/study-finds-methane-leaks-in-pa-are-much-higher-than-state-reports/>

<https://www.reuters.com/article/us-usa-drilling-abandoned-specialreport/special-report-millions-of-abandoned-oil-wells-are-leaking-methane-a-climate-menace-idUSKBN23N1NL>

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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