

3254

**Kathy Cooper**

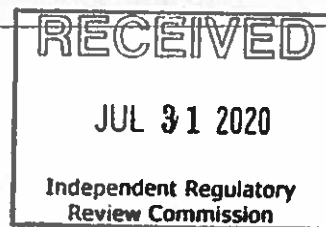
---

**From:** ecomment@pa.gov  
**Sent:** Friday, July 24, 2020 11:06 AM  
**To:** Environment-Committee@pasenate.com; IRRRC; 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)

---

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:

Judy Morgan  
(JUDYMORGAN711@yahoo.com)  
16 W Moreland Ave  
Philadelphia, PA 19118 US

---

Comments entered:

Comment received as a voicemail, transcribed below:

Hi Yes my name is Judy Morgan and I'm calling with regard to the control of VOC emissions for oil and natural gas sources. My phone number is 2673855049 my address is 16 W Moreland Ave, Philadelphia, PA 19118 my email address is JUDYMORGAN711@yahoo.com. And my testimony is as follows.

I am concerned with the proposed regulation does not sufficiently protect Pennsylvanians from climate change. I have a background in environmental education and the prospect of what climate change can mean in Pennsylvania and throughout the world is personally very distressing to me. If we do not act forcefully now we will face a world of increasing weather extremes, droughts floods, horrific storms and potential food disruptions over the next few decades. Global CO2 concentrations hit an all time high last month, despite the avowed commitment of most governments to reduce CO2 emissions. We cannot afford additional delay in decreasing fossil fuel use as rapidly as possible. The fossil fuel industry must recognize it has a moral responsibility to take leadership in the transition to clean energy rather than opposing the steps needed. I ask anyone on the call associated with the fossil fuel industry to imagine

looking into the eyes of their grandchildren and saying" I'm sorry. I failed to do the hard work that needed to be done to protect you to ensure that you have a safe world to live in." We simply can't do this we cannot fail in our responsibility. One simple necessary step is to act immediately to end any unnecessary leakage of methane, a major contributor to climate change into the environment. The proposed regulation of methane leaks is a very positive step. However, several loopholes must be addressed. So that it can be as effective as it needs to be. I urge the Department to make the following improvements to the proposed rule.

Number one closed. The loophole in the proposed rulemaking that exempts low producing wells from the rules leak inspection requirements. Low producing wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania and all wells, regardless of production, require routine inspections.

Number two: eliminate the provision that allows operators to reduce the frequency of inspections, if previous inspections reveal only that a small percentage of components is leaking. Research shows that large uncontrolled leaks are random and can only be detected with frequent and regular inspections

Number three: ensure this proposal includes requirements for all emission sources covered in DEP's already adopted standards for new oil and gas sources. Thank you for this opportunity to express my concerns and requests, and again I appreciate very much the positive step that is being taken with the proposing of these regulations. Thank you.

---

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