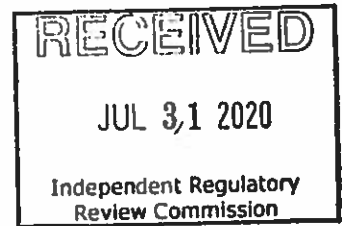


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Testimony
DEP Hearing on VOC and methane capture rule
June 25, 2020

For proposing the rule on the capture of volatile organic compounds and methane gas, I thank Governor Tom Wolf and the Pennsylvania Department of Environmental Protection. Given the burden of tens of thousands of tons of fugitive methane and VOCs from conventional and unconventional oil and gas wells, it is high time for a rule of this kind.

The rule is predicted to reduce VOCs by 4,400 tons per year, and methane by 75,600 tons per year. While these are large numbers, though, they amount to a small percentage of annual total emissions. Under this rule as written, methane will be reduced by 7.5 percent, and VOCs by less than 7 percent, and this is not enough.

Pennsylvania is a major emitter of greenhouse gas and toxic air pollution as a result of its investment in oil and gas operations dating back a century and a half. The old oil wells are still venting pollution, and orphaned wells from the beginning of unconventional shale gas drilling as well as currently-operating oil and gas facilities have greatly increased the air pollution load.

Pennsylvanians pay dearly for the success of the oil and gas industry. Because our air is dangerous to breathe, our water is compromised, and our forests and farmlands are damaged, our health is compromised in many ways. In addition, each of us pays a lot of money to keep big oil and gas afloat. In addition to the cost of human and animal disease, we pay in taxpayer dollars that companies get in tax breaks, and we pay to remediate the environmental damage done over the years. To plug an old well can cost tens of thousands of dollars.

Plugging old wells and capturing fugitive emissions are true costs of producing and processing oil and gas, but the industry does not treat them as such. No, the industry passes them off to us, the public. And we allow them to do so and pick up the tab.

While the industry complains that the new rule will cost them too much, the DEP is reported to estimate the average cost per operator to be \$5,000, and that is not too much to ask. Indeed, much more needs to be done to capture fugitive methane and VOCs. Please, do not exempt low-producing wells, do go after methane directly, and do require the oil and gas industry to foot the bill. Thank you.

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