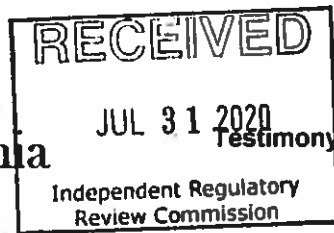


**Pennsylvania  
Council  
of Churches**



Testimony for Control of VOC Emissions from Oil and Natural Gas Sources  
Testimony of the Rev. Sandra L. Strauss  
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My name is the Rev. Sandra Strauss. I am a resident of Harrisburg, Pennsylvania, and the Director of Advocacy and Ecumenical Outreach for the Pennsylvania Council of Churches. Thank you for the opportunity to speak at this virtual public hearing.

We believe that all creation is a gift from God, and we are called to be faithful stewards of creation on God's behalf. Loving our neighbor means recognizing that we are all dependent on this fragile web of creation, and our neighbors suffer when we violate its integrity. Therefore, we advocate and work to protect our environmental resources so that all of creation can thrive and live abundant lives.

Pennsylvania is already hurting from the effects of a climate crisis. We have long had some of the worst air quality in the nation. In recent years we have had record-breaking heat and severe storms that harm agriculture—one of our state's largest industries—by decreasing crop yields and endangering the livelihoods of our farmers. Even more critical for us, this crisis disproportionately harms our most vulnerable neighbors and people living on the margins. Rising temperatures: (1) directly threaten older persons and those who have no respite from the heat; (2) contribute to rising levels of air pollution, threatening the health of those with comorbidities such as respiratory and cardiac conditions; and (3) expose everyone to vector-borne diseases such as West Nile and Lyme disease because winters are no longer cold enough to kill off the carriers.

Methane is one of the most potent greenhouse gases, more than 80 times more potent than carbon in the first 20 years after it is released into the atmosphere. Already the third largest greenhouse gas emitting state, unconventional gas production, or fracking, makes us the second largest natural gas producing state. Significant amounts of methane are released in the extraction and movement of natural gas. In fact, it is estimated that methane emissions from this industry are around 1.1 million tons annually, more than 16 times what is reported to the DEP. At this level, the annual impact is about double that of all cars in Pennsylvania combined.

Cutting these methane emissions is essential to reducing greenhouse gas emissions in Pennsylvania—and is a quicker and more cost-effective means to getting there than some other approaches. We are heartened that the DEP has proposed a rule to address these emissions, but we are also concerned that it does not go far enough. Loopholes in the proposal would mean that over half of current methane pollution would remain untouched—low-producing wells would be exempted from leak inspection requirements, and larger producers could be granted less frequent inspections based on reports of small percentages of on-site leaks. However, leaks do not read the rules—large releases can happen at any time without warning. And it should be noted that gas producers have not always had the best record for honest reporting. Closing these loopholes will lead to greater reduction in methane emissions, contributing greatly toward progress on Governor Wolf's goal of 80% reduction in greenhouse gas emissions by 2050.

Given Pennsylvania's record, we believe our Commonwealth has a responsibility to take a leading role in reducing harmful methane and air pollution from existing sources. We also affirm the importance of Pennsylvania's Environmental Rights Amendment, which sums up perfectly our beliefs as people of faith—that everyone has a right to a clean and healthy environment, now and in perpetuity; that the Commonwealth's resources are common property of all; and that we are the trustees of our environmental resources, responsible for conserving and maintaining them for the benefit of all people.

Therefore, we urge adoption of the proposed methane rule with the improvements we have already noted, closing the loopholes that exempt low-producing wells from inspection requirements and that allow for reduced frequency of inspections for all other wells. We also urge inclusion of requirements for all sources covered in the DEP's already adopted standards for new oil and gas sources.

Thank you for considering my testimony, and once again, please adopt a strong final rule that ensures the health and safety of every Pennsylvanian, now and always.