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**Kathy Cooper**

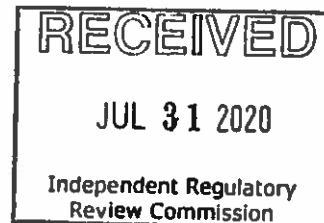
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**From:** ecomment@pa.gov  
**Sent:** Sunday, July 26, 2020 12:38 PM  
**To:** Environment-Committee@pasenate.com; IRRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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**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:

Robin Schaufler  
(robin@likethebird.com)  
21 Oberlin Ave  
Swarthmore, PA 19081 US

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Comments entered:

I have more to say than just the standard PennEnvironment letter. Please read all the way through.

The proposed rulemaking to limit climate-warming methane pollution and harmful volatile organic compounds from existing oil and gas operations marks great progress in Pennsylvania's efforts to curb climate pollution and protect public health. However, the proposal currently contains loopholes that must be addressed.

First, please close the loophole that exempts low-producing wells from the rule's leak detection and repair requirements. These wells, despite not producing much gas, are responsible for more than half the methane pollution from oil and gas sources in Pennsylvania. All wells have equipment failures and therefore require on-the-ground leak inspections.

Second, please eliminate the rule provision that allows operators to reduce the frequency of inspections merely because past inspections did not reveal significant methane leaks. We've seen from other states and the latest research that large, uncontrolled leaks can occur at any time. Frequent, consistent inspections are the only way to identify them before they do major

damage to our communities and the environment.

Third, methane emission monitoring needs to be applied to animal agriculture, especially cattle and sheep. Because of their digestive process, their mouths emit methane. While an individual animal may emit negligible amounts, they add up, and in aggregate are significant.

Monitoring and eliminating methane pollution should be the top priority in combating the climate emergency for two reasons. The first is that it is 86 times as potent as CO2 in its global warming potential. The second is that, in contrast to the millennia long decay period for CO2, it decays into CO2 in ten to twenty years. Thus, removing methane from our emissions will pack more immediate punch into slowing down global climate change.

Comprehensive regulation on methane will send a signal to investors, the country, and the world that Pennsylvania can advance long-term climate solutions in a way that both protects our communities and makes good business sense. Please protect our health and climate by strengthening and removing loopholes from the proposed methane rule released earlier this summer.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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