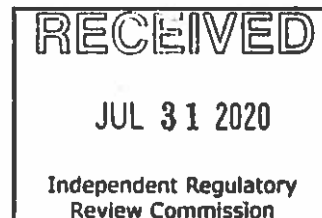




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July 22, 2020



**Submitted Electronically Via E-Comment**

Krish Ramamurthy, Director  
Bureau of Air Quality  
PA Department of Environmental Protection  
Rachel Carson State Office Building  
12<sup>th</sup> Floor, P.O. Box 8468  
Harrisburg, PA 17105-8468

**RE: Proposed Rulemaking - Control of VOC Emissions from Oil and Natural Gas Sources**

Dear Mr. Ramamurthy:

Seneca Resources Company, LLC ("Seneca") submits these comments regarding the Proposed Rulemaking – Control of VOC Emissions from Oil and Natural Gas Sources ("Proposed Rulemaking") published by the PA Department of Environmental Protection ("DEP") in the Pennsylvania Bulletin at 50 Pa.B.2633. Seneca is a company organized and existing under the laws of the Commonwealth of Pennsylvania and is the exploration and production subsidiary of National Fuel Gas Company. Seneca explores for, develops and produces natural gas and oil reserves in California and Pennsylvania, including the Marcellus and Utica Shales. Seneca has operated in Pennsylvania for over 100 years and owns/leases oil and gas interests in approximately 785,000 net acres in the Commonwealth. As a result, Seneca has a vested interest in conducting its development operations in a safe and effective manner to protect the environment. In addition, the Marcellus Shale Coalition (the "MSC"), of which Seneca is a member, has contemporaneously submitted comments to DEP regarding the Proposed Rulemaking, and Seneca incorporates herein and supports the comments submitted by the MSC.

While Seneca expects and supports strong meaningful oversight by the Department of oil and gas development and operations in the Commonwealth, various aspects of the Proposed Rulemaking will impose costly and unduly burdensome requirements upon oil and gas operators that will provide little or no benefit to air quality in the Commonwealth. Therefore, Seneca urges the DEP to modify the Proposed Rulemaking consistent with the recommendations set forth below and in the MSC's comments.

*Section 129.124(d).* This section requires the tagging of all pneumatic controllers. While tagging may be appropriate for pneumatic controllers that do not meet the standard set forth in Section 129.124(c), there is no such limitation included in the rule. Enforcing this requirement for all pneumatic controllers will be costly and overly time-consuming for something that will not provide any environmental benefit. Thus, Seneca suggests removing provisions for tagging pneumatic controllers.

*Section 129.127(b)(1)(ii)(B).* This section requires quarterly Leak Detection and Repair ("LDAR"). Seneca sees the benefit of LDAR and believes following current schedules and timeframes is sufficient to provide the environmental benefit of minimization of fugitive emission leaks that the Department is looking for. As demonstrated by Seneca's current LDAR Program, approximately 98,000

components are inspected within the Commonwealth with a resultant leak rate identified and repaired of 0.26%. Based on program data, the risk of leakage is not an issue and therefore increased frequency will only add costly compliance and recordkeeping requirements. Seneca notes that the Department did add a mechanism to decrease the frequency of inspections, however, even with that provision, the recordkeeping to demonstrate compliance for the change in frequency will create complicated tracking to ensure compliance. In order for the Department to adequately reflect the benefits identified of implementation of current LDAR standards, Seneca suggest updating annual reporting requirements to allow a provision for reporting of fugitive emissions based on documented LDAR data versus standard population counts and emission factors. Thus, Seneca suggests keeping LDAR requirements consistent with current standards and as noted adding the provision to annual reporting.

Based on the above and the comments submitted by the MSC, Seneca respectfully requests that the DEP consider adopting the recommended changes to the Proposed Rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Elliott", is positioned above the printed name.

Brad Elliott

*Vice President, East Division*