

The Nature Conservancy 
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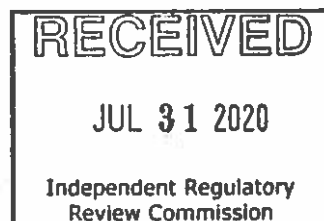
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July 27, 2020

Submitted Electronically

The Honorable Patrick McDonnell, Secretary
Department of Environmental Protection
Policy Office, Rachel Carson State Office Building
Post Office Box 2063
Harrisburg, PA 17105



RE: Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

Dear Secretary McDonnell,

I am writing on behalf of The Nature Conservancy (TNC) in Pennsylvania to provide comments on the Department of Environmental Protection's (DEP) proposed Control of VOC Emissions from Oil and Gas Sources. TNC works in Pennsylvania and around the world to conserve the lands and waters on which all life depends. Guided by science, we pursue innovative, on-the-ground solutions to our world's toughest challenges so that nature and people can thrive together.

Climate change threatens the well-being of humans and ecosystems, and in order to prevent its most severe impacts, a wide array of measures will need to be employed. One such measure is reducing fugitive methane emissions associated with the production of oil and natural gas. Pennsylvania is the second largest producer of natural gas in the United States. As such, curbing VOC and methane emissions from oil and natural gas sources is of considerable importance to the Commonwealth's efforts to reduce global greenhouse gas emissions and protect public health. We appreciate the commitment of Governor Wolf and the Department to addressing this important issue through the development of a regulation that will help Pennsylvania meet its climate and air quality goals.

Methane is a potent heat-trapping gas with 84 times the warming potential of carbon dioxide over a 20-year period. A recent study released by the Global Carbon Project suggests that global methane emissions continued to climb through 2017—the latest year for which worldwide numbers are available, with an annual increase that undermines the world community's ability to keep global temperatures under the IPCC goal of 1.5 degrees Celsius.

The Department's proposed rulemaking is designed to reduce air pollution from existing natural gas wells and infrastructure in order to protect public health, limit greenhouse gas emissions and implement the Commonwealth's Methane Reduction Strategy. The proposal relies on leak detection and repair (LDAR) and more frequent use of leak-sensing technologies, which create opportunities to reduce natural gas losses and promote greater efficiency. Using these tools to control VOC and methane emissions is a smart approach to improving air quality and fighting climate change.

We note that concerns have been raised regarding specific provisions in the proposed rulemaking that might have the potential to reduce its overall effectiveness in limiting fugitive emissions. Research indicates that fugitive emissions from low-producing wells can contribute a significant portion of methane emissions from gas production in Pennsylvania. However, these wells are exempt from LDAR under the current regulatory proposal. Accordingly, we encourage the Department to work with key stakeholders to address the need for a fair, reasonable and effective approach to leak detection and repair at these facilities.

Separately, we also note that the proposed rule allows for the possibility of reduced inspection frequency based on prior inspection results. Because the frequency of inspections can play an important role in detecting leaks due to equipment failure or random events, we encourage the Department to evaluate the risks associated with reducing inspection frequency when it considers potential options for regulatory flexibility, and to explore alternative approaches as warranted.

Thank you for the opportunity to submit these comments. Please contact me if you have any questions or require additional information.

Thank you,

A handwritten signature in cursive script, reading "Evan R. Endres".

Evan R. Endres
Climate and Energy Policy Manager, Pennsylvania
The Nature Conservancy in Pennsylvania and Delaware