

3256

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, August 7, 2020 12:49 PM
To: Environment-Committee@pasenate.com; IIRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (#7-544)

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pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

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:

Kenneth Davis
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Comments entered:

No text comments were provided as part of this comment submittal. Please refer to attachments below.

These links provide access to the attachments provided as part of this comment.

Comments Attachment: [Davis Comment from Academics on Proposed Control of VOC Methane Emissions from Existing Oil and Natural Gas Sources.pdf](#)

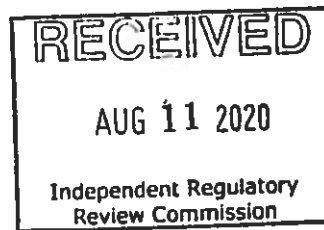
Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy

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3254
July 27, 2020



Comment from Academics on Proposed Control of VOC/Methane Emissions from Existing Oil and Natural Gas Sources

Pennsylvania Environmental Quality Board:

Thank you for adopting a proposed rule to reduce emissions of methane and volatile organic compounds (VOCs) from existing oil and gas infrastructure. This rule demonstrates real progress in Pennsylvania's efforts to reduce greenhouse gases and curb climate change. However, we urge the Department of Environmental Protection (DEP) to strengthen the proposed rule to achieve even greater reductions in methane and VOCs.

Climate change is already impacting Pennsylvanians with record-breaking heat and more frequent and severe storms that cause flooding. Warmer temperatures from climate change are projected to result in additional air pollution, increased flooding and droughts, decreased crop yields, and a rise in vector-borne diseases, such as Lyme disease and West Nile virus.

Reductions in methane emissions from the oil and gas industry in Pennsylvania must play a key role in achieving Governor Wolf's own climate change commitments, including reducing Pennsylvania's greenhouse gas emissions by 80% by 2050 (from 2005 levels). Peer-reviewed studies have consistently shown that methane emissions from the oil and gas industry are on the rise in Pennsylvania. Methane is more than 80 times as potent as carbon dioxide at trapping heat in the atmosphere over a 20-year timeline, so reducing methane pollution from the oil and gas industry is a quick and cost-effective way for Pennsylvania to reduce greenhouse gases. Advances in technology allow the oil and gas industry the opportunity to achieve close to zero methane leaks while, in many cases, providing cost-savings for operators. When strengthened, DEP's rule can fully leverage this opportunity.

We recommend three specific changes to the rule to achieve greater reductions in emissions of methane and VOCs. First, the proposed rule exempts thousands of low-producing wells¹ from commonsense leak detection and repair requirements. Research has demonstrated that low-producing wells are responsible for a disproportionate and significant amount of methane pollution from oil and gas sources in Pennsylvania.² In practice, fewer than 1% of Pennsylvania's tens of thousands of conventional wells meet this production threshold, meaning that over 99% of these wells will be exempted from any leak inspection requirements. This, despite the fact that a recent Environmental Defense Fund analysis shows that conventional wells are responsible for more than half the methane

¹ The production threshold in the draft rule covers wells with a gas to oil ratio (GOR) greater than or equal to 300, that produce, on average, greater than 15 barrels of oil equivalent per day.

² "Methane Emissions from Natural Gas Production Sites in the United States: Data Synthesis and National Estimate." Mark Omara, et. al (2018). Environmental Science & Technology 2018 52 (21), 12915-12925. <https://pubs.acs.org/doi/10.1021/acs.est.8b03535> ; "Methane Emissions from Conventional and Unconventional Natural Gas Production Sites in the Marcellus Shale Basin." Mark Omara, et. al (2016). Environmental Science & Technology 2016 50 (4), 2099-2107. <https://pubs.acs.org/doi/abs/10.1021/acs.est.5b05503>

pollution from Pennsylvania's oil and gas sector. All wells require routine, comprehensive inspections, regardless of production levels. Accordingly, we urge DEP to remove this exemption from the rule and require routine inspections for all wells to ensure emission leaks are quickly identified and repaired. Second, the proposal would allow operators to reduce the frequency of inspections if a small enough percent of equipment is found to be leaking on-site over consecutive inspections. Research shows that large, uncontrolled leaks are random, difficult to predict, and can only be detected with frequent and regular inspections. The majority of methane emissions are from a small number of sites with very large leaks, so finding and fixing these leaks must be a top priority.³ We urge the DEP to eliminate this step-down provision. Third, we urge DEP to include control requirements in the rule for all emission sources covered in the DEP's 2018 general permits for new oil and gas sources (GP-5 and GP-5A). Including requirements for these additional sources, such as remote pigging operations and liquids unloading, will ensure that the rule is comprehensive and consistent with oil and gas control standards already implemented in Pennsylvania.

We urge the DEP to incorporate these recommendations into the proposed rule in order to comprehensively control methane and VOC emissions from as many sources of existing oil and gas operations as possible.

Thank you for your consideration.

Sincerely,

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³ "Repeated leak detection and repair surveys reduce methane emissions over scale of years." Arvind P Ravikumar *et al* (2020). *Environ. Res. Lett.* 15 034029. <https://iopscience.iop.org/article/10.1088/1748-9326/ab6ae1>

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