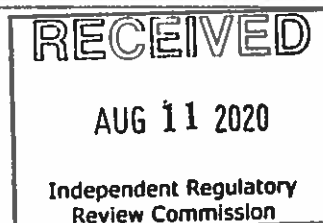


3256

Kathy Cooper

From: ecomment@pa.gov
Sent: Friday, August 7, 2020 12:49 PM
To: Environment-Committee@pasenate.com; IRR; 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:

Steve Hvozdovich
Clean Water Action (shvozdovich@cleanwater.org)

, PA US

Comments entered:

We're facing a climate crisis. The devastating impacts of climate change are beyond dispute. A report by Penn State University scientists details the projected impacts to Pennsylvania which include expected warmer temperatures throughout the 21st century, additional precipitation, more frequent and intense storms, including flooding, and longer dry periods, including droughts. If we're to avoid the looming most disastrous impacts of climate change, the Intergovernmental Panel on Climate Change's Special Report on Global Warming concludes we have to eliminate greenhouse gas emission by 2050.

Methane, the main component of natural gas, is a greenhouse gas that is 86 times more damaging at trapping heat in the atmosphere than carbon dioxide. Pennsylvania's oil and gas industry emits hundreds of thousands of tons of methane each year. Reports have revealed that methane emissions from oil and gas plants are higher than what industry is reporting to the government and accidents are also being underreported. As the third largest greenhouse gas polluting state in the nation, Pennsylvania bears an outsize responsibility for addressing our climate crisis.

There's no reason to do just the bare minimum given the extent of the methane problem in our

Commonwealth. The Pennsylvania Department of Environmental Protection must strengthen its proposed regulation to control emissions from existing oil and gas operations.

In addition, it includes exemptions for natural gas wells that produce a low amount of gas. Research has shown that these low-producing wells can actually emit just as much methane or more than higher producing wells. When aggregated the emissions from these wells also generate a significant amount of emissions. In the interest of limiting climate-damaging methane emissions, this exemption must be removed from the proposed rule.

There's also a provision that allows operators to shirk their responsibility to inspect their equipment frequently just because previous inspections did not reveal significant leaks. Continued vigilance and monitoring is the only way we can ensure there are no breakdowns that threaten the intent of these regulations. Thus, this exemption should also be eliminated from the proposed rule.

For Pennsylvania to be a leader on climate change and meet its commitment of reducing greenhouse gas emissions 26% by 2025 and an 80% reduction by 2050, from 2005 levels, we can't leave a lot of potential methane reductions on the table. Especially when we know a rapid reduction is something that we can do immediately to help curb the near-term rate of warming.

We will be remembered for how we used this opportunity to make an impact on climate change. We must demonstrate environmental leadership by strengthening and finalizing as soon as possible regulations to mitigate methane from existing fossil fuel operations.

Sincerely,

Clean Water Action- Steve Hvozdovich
Women for a Healthy Environment- Michelle Naccarati-Chapkis
Fossil Free Penn- Maeve Masterson
350 Philadelphia, Mitch Chanin
350 Pittsburgh, Peter Wray
THE SHALOM CENTER, Rabbi Arthur Waskow
Sunrise Movement Temple University, Sean Welch
A SMART Collaboration LLC, Peter Winslow
Sunrise Movement: Philadelphia Hub, Aaron Appel
Climate Reality Pittsburgh and SWPA, Phoebe Shackeroff Reese
Citizen Climate Lobby: Pittsburgh, Ray Roberts
Nine Mile Run Watershed Association, Brenda Smith
Citizen's Coal Council, Aimee Erickson
Pittsburgh United, Jennifer Rafanan Kennedy
Allegheny County Clean Air Now, Angelo Taranto

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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