

Month, Day, 2020

Bureau of Air Quality Rachel Carson State Office  
Building P.O. Box 8468 Harrisburg, PA 17105-8468

*Re: Proposed Rulemaking: Control of VOC Emissions from Oil and Natural Gas Sources (25 Pa. Code Chapters 121 and 129)*

We are 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 are 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.

Despite the severity and urgency of the situation, Pennsylvania is failing to get to the root of the issue. The Pennsylvania Department of Environmental Protection's proposed regulation to control emissions from existing oil and gas operations only directly targets volatile organic compounds (VOCs) and describes reducing methane emissions as a "co-benefit". It also allows operators to shirk their responsibility to regularly inspect for leaks and exempts certain sources- further minimizing the regulation's effectiveness.

The draft rule as currently written allows leaks in many parts of the state to emit substantially more methane before triggering VOC controls. Most of the Marcellus Shale in Pennsylvania is comprised of dry gas, meaning it contains a lower fraction of VOCs than the "wet gas" area of the state (primarily southwest Pennsylvania). By not addressing methane leakage directly, DEP would be allowing a significant amount of methane leaks to occur at gas infrastructure throughout the Commonwealth. From a climate change perspective, this is irresponsible.

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 is 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.

There is no reason to do just the bare minimum given the extent of the methane problem in our Commonwealth. 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.

*Signed:*