

July 27, 2020

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

Dear Members of the Environmental Quality Board,

As members of public health professions, advocates, and organizations, we urge the Wolf administration to strengthen the existing source methane/VOC rule. Protecting our health, air quality, and climate is critical for all Pennsylvanians.

**BACKGROUND**

Pennsylvania is home to about 80,000 oil and gas wells. Pennsylvania's oil and gas industry vents and leaks more than 1.1 million tons of methane, the primary component of natural gas, each year – over 16 times more than what industry self-reports to the state.

**A PUBLIC HEALTH CRISIS**

Methane is a potent greenhouse gas that is responsible for 25 percent of the climate change we're already experiencing worldwide. Over a 20-year timeline, methane is 87 times more potent than carbon dioxide at trapping atmospheric heat. A warming planet is responsible for increased occurrences of dangerous heat waves, devastating natural disasters, and vector-borne diseases.

Along with methane comes an unhealthy levels of toxic compounds – including volatile organic compounds (VOCs), fine particulate matter (PM2.5), hazardous air pollutants (HAPs), and silica dust. Methane and VOCs can leak at every stage of the natural gas supply chain, from production and processing to transportation and storage.

More than two dozen studies have shown a correlation between oil and gas development and a host of health issues, including respiratory problems, cardio-pulmonary issues, fatigue and nausea, neurological issues such as memory impairment, and depression. Some studies have shown an increased incidence of birth defects, premature births, and low birth weight babies born to mothers living close to oil and gas development. People have up to 86 times greater exposure to known cancer-causing chemicals, such as benzene and toluene, if they live approximately one mile or less from unconventional drilling sites.

## HOW TO MAKE THE PUBLIC SAFER

Cutting VOC/methane pollution from the oil and gas industry is a quick and effective way for Pennsylvania to reduce climate-warming greenhouse gases. It also reduces the amount of toxic compounds in local environments.

The Pennsylvania Department of Environmental Protection (DEP) has announced a public comment period for a proposed rule to reduce emissions of methane and other harmful air pollution, such as smog-forming VOCs, from existing oil and gas operations. But the rule could be stronger.

## STRENGTHENING THE RULE

Pennsylvanians signing below agree that the draft methane/VOC rule is a good first step but can be strengthened to address the climate crisis and public health impacts of the oil and gas industry. More specifically, the DEP should:

1. Close the loophole in the proposed rulemaking that exempts low-producing wells from the rule's leak detection and repair requirements. Low-producing wells are responsible for more than half of the methane pollution from oil and gas sources in Pennsylvania and all wells, regardless of production, require routine inspections.
2. Eliminate the provision that allows operators to reduce the frequency of inspections if previous inspections do not reveal significant methane leaks. Research shows that large, uncontrolled leaks are random and can only be detected with frequent and regular inspections.

Again, we urge the Wolf administration to take these important steps to protect the health of all Pennsylvanians.

Respectfully,

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