

## **Comments by the Clean Air Board of Central Pennsylvania**

### **25 PA. CODE CHS. 121 AND 129 25 PA. CODE CHS. 121 AND 129 ]**

#### **Control of VOC Emissions from Oil and Natural Gas Sources**

The Clean Air Board of Central Pennsylvania (CAB) was founded in 2005 by a group of Cumberland County physicians and the faith community. CAB is a volunteer organization. Starting with a small group of dedicated volunteers, we spread the message that citizens can accomplish much to protect our health and the quality of life. CAB has been working at raising public awareness of air quality issues, advocating policy and practices for clean air, and monitoring air quality.

The Pennsylvania Department of Environmental Protection is proposing regulations to control emissions from existing oil and gas operations. The proposed rules address two air pollution challenges facing Pennsylvania – ozone and methane. Ozone is formed when nitrogen oxides and volatile organic compounds mix in the atmosphere with sunlight. We are in an Ozone Transport Region where we produce pollutants that result in ozone formation and receive ozone formed from pollutants released upwind of us. Under the Clean Air Act, Pennsylvania is obligated to do more to reduce ozone.

Methane, the main component of natural gas, is a potent greenhouse gas. 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 operations are higher than what industry is reporting to the government. As the third largest greenhouse gas emitting state in the nation, Pennsylvania bears a responsibility for addressing our climate crisis.

Methane is the gas that oil and gas operators seek to produce and capture. Leaking methane reduces the amount that operators capture and transmit for sale. DEP's proposed regulations to control emissions from existing oil and gas operations directly targets volatile organic compounds (VOCs) while describing reducing methane emissions as a "co-benefit." Unfortunately, the proposed regulations do not set controls for leaking methane.

The proposed rule as currently written allows operators in many parts of the state to emit substantial amounts of methane before triggering VOC controls. Much of the Marcellus Shale gas 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 is allowing a significant amount of methane leakage to occur.

We support a Leak Detection and Repair (LDAR) program with frequent inspections including audio, visual and odor detection. It should be operators' responsibility to regularly inspect for

leaks. Like operating a motor vehicle, regular inspection and maintenance is necessary to keep the vehicle in good running condition. In the proposed regulations, there is also a provision that allows operators to avoid the responsibility to inspect their equipment frequently because previous inspections did not reveal significant leaks. Good stewardship of the environment requires continued vigilance. Regular monitoring is the way we can ensure there are no breakdowns that threaten the purpose of these regulations. This exemption should also be eliminated from the proposed rule.

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

There is no reason to do just the bare minimum given the extent of the methane problem. From a climate change perspective, this is irresponsible. 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, we cannot leave potential methane reductions off the table. We must demonstrate environmental leadership by strengthening and finalizing regulations.

On behalf of the Clean Air Board, thank you for your attention.