

## Testimony for Control of VOC Emissions from Oil and Natural Gas Sources

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Commenting on behalf of the **Association for Climate Health**  
In front of the Pennsylvania Department of Environmental Protection  
Virtual Hearing of June 23, 2020 at 6 pm

Good evening. I am Nancy Boxer, Director of the Association for Climate Health. Thank you for the opportunity to speak today.

First, thanks to Governor Wolf and the DEP, for this proposal to reduce dangerous VOC and methane emissions coming from the wells, compressor stations and pipelines throughout our state. VOCs create smog which threatens visibility and the public health. Methane is the major component of natural gas, and while carbon dioxide is known as a major pollutant leading to climate change, methane is smaller but mightier. It is the **Napoleon Bonaparte** of greenhouse gases, leaving devastation in its invisible but potent path.

We have much to be proud of in Pennsylvania, but NOT our role as one of the most air polluting states in the nation. We are a top contributor to greenhouse gases, partly from our large **but leaky** production of natural gas.

As with most proposed changes, we expect resistance from people used to the current level of regulation who don't want to pay more or risk losing value in their assets due to changes in how they do business. Yes, jobs and profits may be threatened. Pennsylvania producers claim they are doing a perfectly adequate job policing themselves, and they argue, why ever would they allow much leakage of this valuable product?

The answer is that it can be more expensive to fix and repair pipelines or refit wells and compressors than it is to lose the gas lost under current operating conditions. It is more profitable to ignore these losses, even when they poison the drinking water supplies in adjacent communities, even when children at nearby schools get sick, even when these gas emissions threaten world food supplies due to global warming and the coastlines due to rising seas. Create dangerous levels of heat, and extreme weather events causing destruction of homes, property and lives in every county, every state, every nation.

Yes, some jobs may be lost, and shareholders may earn less money. But when a builder lets their supplies spill into the nearby streets, we make them clean it up. Why? Because it is wrong to let businesses create a public hazard. If a drug company produces a medication with life-threatening complications, we make them remove it from the market even if jobs are lost, until they can figure out a way to make their product without killing people. The oil and gas industry should be no different.

Yes, there will be costs. But costs are imposed on **all** of us to promote public safety. Children must be immunized before they enter the public schools; homeowners must comply with fire, plumbing and electrical codes even though it costs more; businesses must maintain safe workplaces and produce their products and services in ways that do not endanger the public. Even if such requirements make them less profitable or in a few cases, drive them out of business.

And so it is with these regulations – they must be imposed in order to protect all of us – employees, shareholders, ordinary citizens of Pennsylvania. To fail to do so threatens the safety and welfare of our own and future generations.

In fact, we urge the DEP to go even further.

- PLEASE, do **not** lift inspection requirements for equipment which passed previous inspections. My car must be inspected each time even if it passed previously. Why? Because by the next go-round it may have started to pollute, and we don't want those emissions in our skies.
- PLEASE, get RID of minimum size and minimum time in operation for emissions limits and controls. Why? Because small equipment is collectively responsible for an **outsized** share of emissions. And short-term equipment leases can bring the **worst-maintained equipment** into the field, which can be rotated with similar short-term, dirty equipment, resulting in a terrible impact on our air and climate.

Thank you.