

7/25/2025

Pennsylvania Department of Environmental Protection
400 Market St.
Harrisburg, PA 17101

Proposed State Plan: 40 CFR Part 60, Subpart OOOOc – Emissions Guidelines for Greenhouse Gas Emissions from Existing Crude Oil and Natural Gas Facilities

Protect PT (Penn-Trafford) is a residents' group and nonprofit based in Harrison City, Pennsylvania. We started organizing in December 2014, when concerned parents began meeting to educate themselves and their neighbors about the dangers of unconventional oil and gas development in their community. In 2015, these committed parents organized a 501(c)(3) organization to ensure residents' safety, security, and quality of life by engaging in education and advocacy to protect the economic, environmental, and legal rights of the people in Westmoreland and Allegheny counties. We are submitting this comment on behalf of our 235 members.

The Why and How

We need Governor Shapiro and the PA Department of Environmental Protection (DEP) to create a strong, durable, and protective State Methane Emission Reduction Plan. Across towns, counties, and party lines, Pennsylvanians want clean air and a bright future. Our priority today is to ensure substantive, commonsense protections are implemented to reduce methane waste and air pollution from oil and gas operations and protect the people in our frontline communities. Our organization was founded by residents living in the shale gas fields, who can be easily protected from methane pollution by leveraging cost-effective and widely-available technologies to drastically reduce emissions.

This includes enhancing leak detection at all wells, regardless of size, requiring zero-emission process controller devices, eliminating non-essential routine flaring, and creating a Super Emitter program to quickly respond to large leaks and connect impacted residents with methane monitoring and health resources. We also encourage increased plugging of abandoned oil and gas wells, which leak methane into our air unchecked and unmonitored.

This is a crucial time for regulatory change at the state level. The Endangerment Finding, a 2009 EPA finding based on the overwhelming scientific evidence that greenhouse gasses contribute to climate change and negatively affect human health, is the basis of the recent federal Model Rule for methane reduction. The Model Rule, finalized in 2024, sparked the creation of this state rule. However, on March 12, 2025, EPA Administrator Lee Zeldin announced that he is reconsidering the Model Rule and the Endangerment Finding. This reconsideration puts not just Pennsylvania residents at risk, but the entire country. In the face of this regressive move, we urge Pennsylvania to be a leader for the nation by implementing a long-lasting Methane Emission Rule that is tailored for the state and can withstand any Federal rollbacks.

Through the creation of a methane reduction plan, Governor Shapiro has the opportunity to provide regulatory certainty, protect public health, grow Pennsylvania's economy, and create jobs in the methane mitigation industry.

Protecting Health

Methane is the primary component of natural gas and is emitted from oil and gas operations alongside other dangerous pollutants, such as hazardous air pollutants and smog-forming volatile organic compounds (VOCs). VOCs, released alongside methane pollution, contribute to the formation of ground-level ozone. Ozone pollution has numerous negative health impacts, including inflammation of the lungs, metabolic disorders, reproductive harm, and central nervous system issues.¹ Certain carcinogens are also associated with the release of methane, including benzene, which is linked to leukemia.

Pennsylvania residents are directly exposed to this pollution and regulatory standards need to be in place to protect them. Roughly 1.2 million Pennsylvania residents live within a half-mile of an active oil or gas wellsite.² Those residents are vulnerable to developing serious health conditions. Additionally, this pollution disproportionately impacts low-income and vulnerable populations, as these are the communities most likely to live near oil and gas wells. By cutting methane emissions, we also cut air pollution, and we stand the chance to cut down hardships faced by our residents.

¹ FracTracker (2023). Studies Reveal Health Impacts from Fracking in Pennsylvania.
<https://www.fracktracker.org/2023/08/pennsylvania-health-study-results/>

² FracTracker (2023). Studies Reveal Health Impacts.

A peer-reviewed study led by the Boston University School of Public Health and the University of North Carolina Institute found that 605 early deaths were recorded in Pennsylvania as a direct result of oil and gas emissions, second only to Texas nationwide.³ This is an unacceptable number. Furthermore, asthma cases are worsening in our children, with 36,700 exacerbation cases reported in 2016. Swift implementation of improved industry performance standards and emissions guidelines will better protect public health and save lives in PA.

Strengthening our Economy

Enough methane is lost across the U.S. each year to meet the energy needs of 12 million American homes. In PA specifically, during 2020 alone, oil and gas operations emitted over 1 million metric tons of methane.⁴ This wasted gas, valued at \$178 million, could serve 820,000 households. Methane emission standards would incentivize operators to repair leaks and capture gas, ensuring no product is wasted. Hardening systems to keep methane from escaping makes operators more efficient, more resilient, and ultimately more competitive. By ensuring more product is delivered to market and less is wasted, the energy grid will become more resilient.

Older, low production oil and gas wells contribute a disproportionate share of total methane emissions in US basins. Steps to reduce methane emissions could substantially increase the useful output from these sites, cutting waste and pollution all in one. Thanks to readily available and cost-effective technologies, the International Energy Agency estimates that at least 50% of oil and gas methane emissions can be avoided at no net cost, making reductions both feasible and practical.⁵

Investing in new methane reduction technologies would be a key driver for economic growth, creating new, local jobs that directly support the Pennsylvania economy. Pennsylvania ranks among the top five states in the United States for methane mitigation activities, accounting for 8.5% of the total employee locations in this sector nationwide.⁶ This growth is largely attributed to Pennsylvania's state-level methane regulations, which have fostered a favorable business

³ Jonathan J. Buonocore, et al (2023). Environmental Research: Health. DOI 10.1088/2752-5309/acc886

⁴ Environmental Defense Fund (2020). EDF Analysis Finds Pennsylvania Oil and Gas Methane Emissions are Double Previous Estimate.

<https://www.edf.org/media/edf-analysis-finds-pennsylvania-oil-and-gas-methane-emissions-are-double-previous-estimate>

⁵ IEA (2024). Global Methane Tracker 2024, IEA, Paris <https://www.iea.org/reports/global-methane-tracker-2024>, Licence: CC BY 4.0

⁶ Environmental Defense Fund (2024). New Findings Highlight 22% Growth in Pennsylvania's Methane Mitigation Industry. <https://www.edf.org/media/new-findings-highlight-22-growth-pennsylvanias-methane-mitigation-industry>

environment. 33 methane mitigation companies now operate in Pennsylvania, up from 27 in 2021 and 20 in 2014, marking a 65% increase over the past decade. With the right support, the methane mitigation industry can continue to play a critical role in driving environmental and economic progress, and Pennsylvania has the opportunity to be a leader in this industry.

Conclusion

This is a critical time for Pennsylvania to take action and address lifecycle methane emissions in order to protect the health of its residents and encourage industry to perform at higher standards. We strongly believe a Methane Reduction Rule must be developed to withstand federal changes in an effort to secure a sustainable future for generations to come. Ultimately, this plan is for our children, and our children's children, who have the chance to grow up in a cleaner, greener world than we did. Pennsylvania's plan should not just align with the Federal Methane Rule, it should surpass it. We can always go further. We can always do more. And we can do it for them. We hope you consider residents in the shale fields and their children when creating the state's Methane Emission Reduction Plan.

Sincerely,



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