

June 6, 2016

Governor Tom Wolf
Pennsylvania State Capitol
Harrisburg, PA 17105

Cc: Patrick McDonnell, Acting Secretary, PA Department of Environmental Protection

Dear Governor Wolf:

The undersigned organizations, representing hundreds of thousands of Pennsylvania residents, write to you with regard to your Administration's environmental agenda. We have strongly supported the progress your Administration has made since you took office, and will continue to support steps taken by the Administration to secure much-needed protections for public health and the environment.

We were greatly disappointed to hear about John Quigley's resignation as Secretary of the Department of Environmental Protection (DEP), as he was a strong advocate for our shared environmental priorities. Yet we are confident that his recent departure will not delay or derail efforts that were underway during his tenure. We anticipate that your Administration will ensure that key environmental initiatives move forward in a timely manner, and appreciate recent indications by your Administration that this will indeed be the case.

In particular, **we hope to see the swift adoption of revisions to Chapter 78 and 78a of Title 25 of the Pennsylvania Code.** We strongly urge you to publicly reaffirm your commitment to their adoption and to veto any resolutions or bills that would further delay implementation of these critical environmental protection requirements.

No level of regulatory oversight can completely prevent the serious impacts of oil and gas development on the environment and on the health and welfare of Pennsylvania residents. However, we believe that the final draft Chapter 78 and 78a regulations are a significant step forward in aligning Pennsylvania's regulations with new technologies and modern-day practices used by both conventional and unconventional operators, including hydraulic fracturing, the use of large volumes of chemicals and water, and the generation and storage of toxic and potentially radioactive waste.

Chapter 78 and 78a are the result of an extensive, transparent, and inclusive review process that has gone on for nearly five years and included 12 public hearings and nearly 30,000 public comments. Failure to adopt Chapter 78 and 78a would maintain the status quo of insufficient, outdated oil and gas regulations that support environmentally damaging activities. The many Pennsylvania residents statewide who have experienced the degradation of their air, water, health, and property due to oil and gas development should not have to wait any longer for change.

We also expect that the Administration will **continue to prioritize the plan announced by DEP in January to reduce emissions of methane and other pollutants from both new and existing oil and gas operations, and to prevent any legislative efforts to derail this process.** The proposed actions, when fully implemented and enforced, will significantly cut harmful air pollution and greenhouse gases from the industry. Such rules cannot come soon enough for the many Pennsylvania residents whose health is negatively impacted every day by oil and gas emissions.

We are glad that DEP and the Wolf Administration publicly committed to developing best-in-the-nation standards to protect public health and the climate in early 2016, and that the Administration again recently reiterated this commitment with the new Acting PA DEP Secretary. Best-in-the-nation rules will require enforceable standards and the regulation of new and existing sources.

Given the importance of reducing methane emissions, we are concerned about the continued delay in moving forward with DEP's Methane Reduction Strategy. The Air Quality Technical Advisory Committee (AQTAC) has not met since February 11, 2016. At that meeting, DEP introduced the Strategy and set public expectations about the timeline of implementation, suggesting that standards for new sources would be ready by October and those for existing sources would be submitted to the Environmental Quality Board within 18 months. The April 2016 meeting to discuss the official proposal with AQTAC and start the public comment period was rescheduled for June 2016, but has now been delayed until August.

Any further delays in these much-needed standards could prevent the rules from becoming best-in-the-nation, since other states continue to move forward with developing strong methane standards. We urge you to ensure that DEP finalizes and releases its draft proposal as soon as possible, and certainly at the August AQTAC meeting at the latest.

Finally, we strongly believe that industry oversight and enforcement are the true test of regulations and policies. We understand the inherent challenges that the Administration will face in developing and passing a state budget for the upcoming fiscal year. However, **it is critical to secure sufficient funds for DEP to close staffing and resource gaps** that have persisted despite rapid shale gas development. Particularly necessary are increased oil and gas inspections, improvements in resident complaint and response systems, and stronger operator compliance and penalty requirements.

Thank you for your time and attention. Please direct any responses or questions to Steve Hvozdoich of Clean Water Action at shvozdoich@cleanwater.org or 412-765-3053, ext. 210.

Sincerely,

Damascus Citizens for Sustainability, B. Arrindell, Director
Clean Air Council, Joe Minott, Executive Director
Clean Water Action, Steve Hvozdoich, Pennsylvania Campaigns Director
Earthjustice, Deborah Goldberg, Managing Attorney
Earthworks Oil & Gas Accountability Project, Nadia Steinzor, Eastern Program Coordinator
Group Against Smog and Pollution, Rachel Filippini, Executive Director
Lower Susquehanna Riverkeeper, Michael Helfrich, Director
Moms Clean Air Force, Patrice Tomcik, Field Organizer
Mountain Watershed Association, Melissa Marshall, Community Advocate
Nature Abounds, Melinda Hughes, President
PennFuture, Matthew Stepp, Director of Policy
Save Our Streams, Laurie Barr, Founder
Sierra Club Pennsylvania Chapter, Thomas Au, Conservation Chair