

Mon Valley Clean Air Coalition
Box 4579, Morgantown, WV 26504

June 28, 2011

WV Legislative Select Committee on Marcellus Shale Development:

Delegate Tim Manchin
Delegate Barbara Fleischauer
Delegate Tom Campbell
Delegate Woody Ireland
Delegate Bill Anderson

Senator Douglas Facemire,
Senator Corey Palumbo
Senator Herb Snyder
Senator Orphy Klempa
Senator Karen Facemyer

We are writing to you as a member of the Select Committee on Marcellus gas legislation, on behalf of the Mon Valley Clean Air Coalition, a partnership of civic organizations, environmental groups and individual citizens concerned about air quality in Monongalia, Marion, and Preston counties. We work together to raise awareness and promote policies to improve the air we breathe.

As you know, the WV Legislature considered several bills to regulate drilling for natural gas in Marcellus shale. One aspect that has not received adequate attention is the air pollution from gas wells generally, and those with hydraulic fracturing, in particular. Recent EPA studies (1) document that the amount of Volatile Organic Compounds released during well completion with hydraulic fracturing has been underestimated dramatically, often by many hundred-fold. Emissions factors suggest that many of these Marcellus wells, unlike conventional vertical gas wells, qualify as **major sources of air pollution**. These volatile organic compounds can contribute to ozone formation. Many areas of West Virginia are in, or close to, nonattainment for ozone air pollution standards.

In addition to large amounts of methane, gas wells can release a variety of other volatile compounds including hazardous air pollutants such as benzene, dimethyl disulfide, and carbon disulfide. These can produce adverse health impacts, both to workers on site and to nearby residents.

A General Accounting Office report (2) found that much of the gas released (vented or flared) could be economically captured with currently available control technologies. According to the GAO analysis, such control technologies could save enough gas that it would actually **increase profits** for gas companies, and correspondingly, would **increase severance tax collections for the state**. It appears that gas companies generally do not adopt such pollution capture equipment except in those states that require it, even though it would be more profitable for them to do so.

Unfortunately, West Virginia has few rules to regulate air emissions from natural gas wells, pipelines or related facilities. Under current practice, neither WV-DEP's Division of Air Quality, nor the Division of Oil and Gas require any air emissions monitoring, permits or emissions controls on gas wells. Recent cases from Wetzel County document that these emissions are unregulated.

We urge your Committee to incorporate statutory changes to assure that emissions from gas wells are regulated, that pollution controls are applied where necessary, and that these sites are adequately monitored. Attached is some draft language to clarify that natural gas wells, pipelines and related facilities which release air pollutants would be permitted and regulated by the Division of Air Quality, under the same rules as every other industry.

Sincerely,

Linda Shuster

Linda Shuster, Secretary
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Morgantown, WV 26504-4679

Attachment: Draft House/Senate Bill.

Footnotes:

1. US-EPA. 2010. Greenhouse gas emissions reporting from the petroleum and natural gas industry. Background Technical Support Document. Available at: http://www.epa.gov/climatechange/emissions/downloads10/Subpart-W_TSD.pdf

2. GAO. 2010. Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas, Which Would Increase Royalty Payments and Reduce Greenhouse Gases. GAO-11-34 October 29, 2010. Available at : <http://www.gao.gov/new.items/d1134.pdf>