



CENTER FOR COALFIELD JUSTICE

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RE: Comments by the Center for Coalfield Justice Regarding Draft Plan Approval PA-63-01001B for the ETC Revolution Cryogenic Gas Processing Plant in Smith Township, Washington County

Thank you for the opportunity to provide input on Draft Plan Approval PA-63-01001B for the Energy Transfer LP (“ETC”) Revolution Cryogenic Gas Processing Plant (“Revolution”). The Center for Coalfield Justice (“CCJ”) respectfully submits the following comments to the Department of Environmental Protection (“DEP”).

CCJ is a Pennsylvania-incorporated not-for-profit organization with federal Internal Revenue Service § 501(c)(3)-status recognition located in Washington, PA. Our mission is to “improve policy and regulations for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield citizens; and to protect public and environmental health.” CCJ has over three thousand members and supporters and is governed by a volunteer Board of Directors.

CCJ has an extensive history of providing comments concerning Revolution, the nearby Harmon Creek Facility, and the Rover-Bulger Compressor Station expansion. Previously, CCJ has submitted comments on Revolution’s Draft Permit No. 63-01001, Harmon Creek’s (PA-63-01011B) and SOOP No. 63-01011, as well as comments to the Federal Energy Regulatory Commission concerning their National Environmental Policy Act report for the nearby Bulger Compressor Station expansion, as well as joining our partners the Environmental Integrity Project and Clean Air Council in their technical comments to DEP concerning the current Draft Plan Approval PA-63-01001B. With that context in mind, CCJ submits the following comments in addition to Draft Plan Approval PA-63-01001B.

- 1. ETC’s attempt to piece-meal and disaggregate its permits and expansions of Revolution from attached infrastructure in combination with its history of noncompliance hinders DEP’s ability to consider total emissions and apply appropriate permit standards.**
 - a. DEP should return to aggregating the air emissions of the Rover-Bulger Compressor Station to that of Revolution under the current proposed plan approval.**

This is approaching the sixth time CCJ has provided comments concerning permits for the ever-growing industrial mega complex that Revolution is a part of, which includes Harmon Creek and the Rover-Bulger Compressor Station. For surrounding communities these developments have functioned as a singular source of truck traffic, light/sound pollution, flare events, and

impacts from air emissions. If a lay person would examine this area via satellite imaging, or would be a neighbor to these facilities, they would rightfully assume that Revolution, Harmon Creek, and Rover-Bulger function as a one large cohesive piece of our region's oil & gas infrastructure. This assumption would be further supported by the fact that the Rover-Bulger Compressor Station and pipeline is owned and operated by Sunoco LP, which is a subsidiary of ETC, the owner and operator of Revolution. While it is obviously not DEP's place to evaluate the corporate structure of its operators, when it comes to evaluating and aggregating its control and evaluation of air emissions, DEP clearly has the power to look past simply the name on the application when determining if adjacent air emissions sources should be considered together for determining emission limits. CCJ knows this is something DEP is empowered to do, as it previously aggregated air emissions sources from Revolution and Rover-Bulger under the same air permits, something it has inexplicably decided against continuing in the current plan approval.

Despite the coyness and proverbial blinders that ETC deployed when discussing Rover-Bulger during the June 25th Public Conference, when responding to community questions regarding air emission aggregation, Revolution and Rover-Bulger are directly connected, adjacently placed, and necessarily dependent on each other. They are both placed exactly where they are, and only have the capacity and throughput they have because they have each other, and they are each other's main customer. The air emissions from Revolution and Rover-Bulger are generated solely by the specific operations of both facilities. At the same June 25th meeting, ETC stated that they would not need to adjust, update, or expand their existing pipeline interconnect with Rover-Bulger as the current system would be able to handle the substantial increase in throughput Cryo II would create. This implies that ETC specifically built its interconnect with Rover-Bulger in anticipation of this exact expansion, further supporting the completely reliant and interdependent nature of the facilities, as well as their short and long-term operations.

Because of this, it would make much more sense to treat these facilities as if they are different emission sources of the same facility under the same permit, as opposed to separate facilities governed by separate air permits. A more apt comparison would be that of the relationship between the existing Cryo I plant at Revolution and the proposed Cryo II. They conduct largely separate operations, at different throughputs, using meaningfully different technologies. But they operate right next to each other, using shared infrastructure, and have the same entity as the applicant for their air permit. Yet DEP did not even consider not integrating the current plan approval from Cryo II into the existing air permit for Revolution and Cryo I. Truly, what is the major difference between this and Rover-Bulger other than the name on the permit application? Is it simply because Revolution and Rover-Bulger are on separate land parcels? What changed in the operations of Revolution and Rover-Bulger that was the basis for DEP disaggregating their air emissions? When the unanswered nature of these questions is combined with the suspicious potential to emit limits ("PTE") this plan approval contains, it paints a picture that DEP is using the proposed plan approval not as a basis for protecting the Commonwealth, but to aid the operator in allowing it to not operate under a Title V air permit.

b. DEP should deny the proposed plan approval for the Cryo II expansion of Revolution and require ETC to reapply for a Title V major source permit.

A troubling pattern is emerging in the air permit structure DEP is constructing for this oil & gas mega-complex. Just a few months ago, DEP accepted and reviewed a SOOP for Harmon Creek, which projected its PTE for VOC's at 48.33 tpy, just under the 50 tpy, which would require a Title V air permit. Under the current plan approval, Cryo II would increase the Revolution plan's VOC emissions to 49.5 tpy. While CCJ acknowledges that this permit does not directly concern Harmon Creek, we still feel it apt to rehash the arguments we provided DEP on the issues having a PTE so close to that major limit, the temporal closeness and similarities in how these permits are structured requires acknowledgment. Regardless, the optics of this are very concerning. When the vast majority of the data and analysis which calculates the PTE for a facility is done by the operator, they are incentivized to do their modeling in a way that will lead to the least amount of regulatory compliance and oversight. A Title V air permit has much more robust notice requirements, requires deeper coordination and analysis with EPA, and requires implementing BAT to minimize emissions. This means that if an operator can manipulate its projection or state, it will use emission control technology that it won't effectively utilize as a means of getting their PTE just under the major source threshold, they will do so. When I specifically brought up these concerns at the June 25th public conference about the high likelihood of the operator even just barely exceeding their PTE and thus making them a major source emitter, DEP simply stated that enforcement action would be the only appropriate measure for addressing such exceedance and provided no direct pathway for requiring Revolution to reapply for a Title V permit. When all of

this is viewed together, it gives the appearance that DEP is aiding the operator in its attempt to be regulated under an inappropriate air permit structure.

Having projected VOC emissions so close to the 50-ton-per-year threshold incentivizes ETC to use insufficient monitoring or reporting practices to artificially appear to be in compliance. Operating a natural gas processing power plant is an extremely complicated, dangerous, and unpredictable practice in times of emergency. So what will ETC do, and how will DEP respond when inevitable circumstances lead to high-polluting events? Whether due to a defect in the raw gas being processed, a power surge from the region's unstable grid, or a natural disaster, Revolution is forced to flare a substantial amount of its gas, what will happen? Will the DEP assume that the flare burned off 100% or 98% of the VOC's when counting its annual total emissions? Will ETC accurately monitor and report its VOC emissions from these inevitable 'emergency' situations? When the margin of error for regulatory compliance is as slim as it is with Revolution, in application, the following futures are all that remain:

- Revolution somehow becomes the first natural gas processing plant to avoid any of these scenarios and comply near perfectly with its projected emissions
- ETC improperly monitors and/or reports its emissions to DEP in an attempt to artificially maintain compliance
- DEP allows ETC to operate under the proposed plan approval while regularly being out of compliance in dereliction of its duty to protect the people and environment of the Commonwealth
- DEP, in response to Revolution's inevitable future of noncompliance, requires ETC to submit a new plan approval in anticipation of being integrated into a Title V air permit

All of these hypotheticals, all of these issues, could be clearly avoided if DEP would simply require that ETC reapply for a Title V permit for Revolution's air emissions. In the absence of choosing this course of action, DEP has created a situation in which an operator will likely be producing emissions that should designate it as a major source, while operating under a permitting and regulatory framework that lacks the specific protections and requirements for such a major source. In the context of ETC's long history of noncompliance, violations, and settlements with both EPA and the DEP at Revolution, the Rover-Bulger Compressor Station, and Harmon, that scenario feels all but inevitable. DEP cannot simply accept the carefully manufactured application submitted by ETC, with the clear intent not to minimize its emissions but to minimize DEP regulatory oversight of Revolution by barely skirting the requirements for operating as a major emissions source. DEP cannot reward this conduct by allowing the facility to operate under the proposed plan approval, ETC must be required to reapply for a Title V air permit.

2. Revolution's proximity to very popular and culturally important outdoor recreation resources requires heightened scrutiny be applied when accounting for emissions impacts and monitoring.

In working with the community members of Smith Township over the past few decades, CCJ has found a core theme in what are the places and things that come to residents' minds when they think about the place they call home. They'll talk about the rich history surrounding the industrial and demographic evolution of their community, their longstanding family ties to the area, and how much residents enjoy their proximity to the many high-quality outdoor recreation areas they live near. Whether it be the Raccoon Creek Watershed, State Game Lands 117, or Hillman State Park, community members highly value these areas for the recreational opportunities they offer. From hiking, fishing, horseback riding, biking, boating, camping and hunting, community members do not want to see this area spoiled by development or pollution. But unfortunately, over the last decade, ETC, with its Revolution Cryogenic Plant, the neighboring Harmon Creek Natural Gas Processing Facility, and Bulger Compressor Stations, has equally become the places that define their daily lives and identity as residents. Whether it be the noise and light pollution these facilities produce, respiratory health issues from living and recreating near Revolution, or concerns about air pollution impacts when considering sending their children to Burgettstown High School and Elementary School, which is just 1.5 miles from the facility. Fear should never be a core emotion that someone uses to identify with their own community. But for those who spend their time in this area, those fears are only worsening, as the current plan approval represents nothing more than the latest expansion of industrial development, which feels endless and unstoppable to residents. Those feelings and experiences are valuable and should, at the very least, prompt DEP to acknowledge and reevaluate how it handles the permitting of Revolution and the surrounding facilities.

The proximity of the school as well as the numerous outdoor recreation resources, dramatically increases the affected area of the air emissions from Revolution. From a practical perspective, it makes sense for DEP to understand the area of impact of air emissions, including the projected distance and concentration of how those emissions will disperse from a specific source. But for those who

live, work, and recreate near these facilities may spend some or even most of their day to day lives well outside of the standard area of impacts from these emissions and yet will still experience the impacts from them. Obviously, the most affected residents from these air emissions are those who live closest to the facility, but the distributed and rural nature of those residents has been largely weaponized against them as a basis for minimizing the human health and environmental impacts of these facilities. Regardless of the clear need to prioritize the considerations, concerns, and impacts of those residents, it would be equally improper to view them as representative of the people who will and are experiencing impacts from these air emissions. Families who work at and attend Burgettstown Area School District may not live within the area of consideration of air emissions, but their children may still get sick from those emissions merely because they attend their local public school. Moreover, those who recreate in Raccoon Creek and Hillman State Parks may be from all over the region and thus have less notice of the risks and impacts that they could experience due to their proximity to Revolution, Harmon Creek, or Bulger.

Especially when this is considered in conjunction with the type of emissions Revolution will generate, DEP must expand how it considers and evaluates the impacts of its emissions. Persistent low-grade exposure as well as acute short-term exposure to NO_x, VOC's, and CO₂, can cause a laundry list of immediate and chronic health impacts, all while often not being easy to detect sensorily by an average person. This creates a situation where there is an ever expanding web of people who are experiencing impacts from these emissions that are not at all restricted to spending even most of their time within the typical area of review for the facility. This puts these people in a situation where they are far less likely to know the potential source of their symptoms or understand their exposure to dangerous industrial operations merely by using their beloved public recreational resources. This in no way prioritizes these people's impact or experiences over those in frontline communities who are taking on the worst of what these emissions can do, but it provides a clear opportunity for an information gap about what is going on in this area and its proximity to Revolution. That gap not only hinders community members from understanding why they might be having respiratory problems, or skin irritation, or their child developed asthma, it also prevents DEP from being able to understand the true impacts of these emissions, because they do not know of these people's experiences.

This presents the DEP with a clear avenue to expand how they track, limit, monitor, and notify communities about the risks posed by living, working, and recreating near Revolution. Whether that's through a dramatic expansion of its warning system during the numerous flare events that will likely occur, or by allowing for new independent, publicly available air quality monitoring, DEP should use the overburdened nature of this community, along with the local presence of sensitive receptors to create a new publicly available air emission monitoring network. Air emissions tracking infrastructure should be placed at the fenceline of the Revolution parcel, as well as at Burgettstown Area School District, and high-traffic areas within Hillman and Raccoon Creek State Park. This network should be made publicly available in real-time on DEP's website, to allow for better notice and warning for those who live, work, and recreate near Revolution from having more timely and accurate information concerning the air quality around the facility, to empower them to make informed decisions concerning the risk of being exposed to the pollution Revolution produces. Furthermore, this would allow DEP to be able to have better real-time data on the actual on the ground air quality concerns Revolution creates without having to solely rely on ETC's own reports of its emissions. This would additionally reduce the conflict of interest concerns this reporting structure creates, as well as allow DEP to be able to see what the cumulative impacts of all the adjacent infrastructure create, pushing DEP to finally stop reviewing each of its permits in a vacuum to the benefit of industry and at the cost of frontline communities' health.

3. Revolution's proximity to multiple overburdened environmental justice communities in conjunction with DEP's duties as a trustee under the Constitution, requires DEP to conduct a cumulative impact analysis.

In examining ETC's application for the current plan approval, DEP's responsive memo to it, and DEP's presentation at the June 25th public conference on the application, a troubling theme emerges in how DEP presents and vests its authority to review air permits. While difficult to specifically pinpoint, especially during the public conference, DEP gave the impression that the entire plan approval process is largely a box checking exercise for the operator, in which DEP mildly scrutinizes the methodology deployed, all while solely relying on their own regulations as a guide for what it can require of the operator. The candor and approach DEP has taken with this plan approval have been as if it is powerless to deny an applicant who has filled out the right forms, regardless of their practical efficacy, and has provided the bare minimum information to be deemed legally complete. The DEP cannot look to past violations, cannot consider adjacent emissions sources, or cannot be novel or creative when addressing acute or specific air pollution

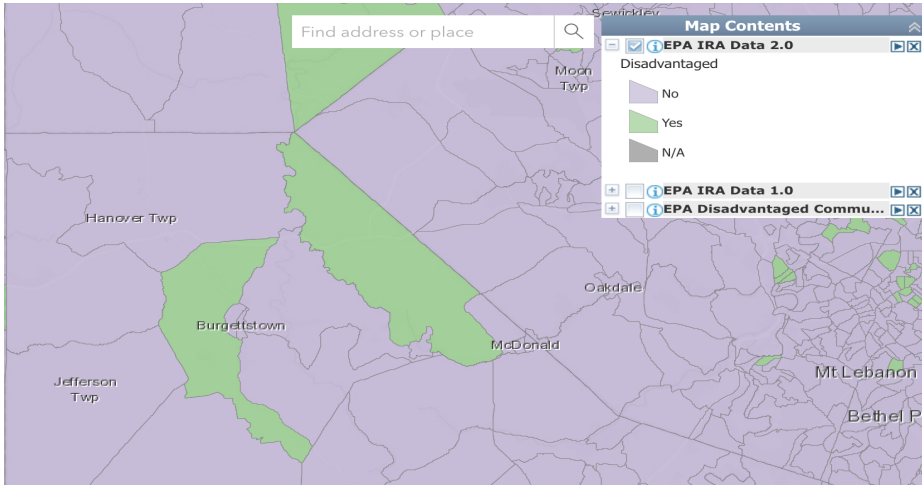
concerns through a plan approval. During the June 25th public conference, in response to many pertinent questions by residents and concerned community groups, DEP's general position was that they could not even consider or address any concerns that are not directly related to the specific information contained within the draft plan approval. Whether it be the past violations from the same operator at the same facility, emissions from necessary attached infrastructure which merely has a different operator (despite both ETC and Rover being owned by the same parent company), or the presence of impacts both current and historic from oil&gas extraction and mining, DEP has taken the position in which it will only review this permit as if it exists on its own planet sequestered from all sources of air pollution. That this plan approval can only be evaluated in an unrealistic operator-driven vacuum where anything outside of it is not just ineligible as a basis for denying the permit, but cannot even be considered. In response to a call to consider the cumulative impacts the community has suffered from air impacts, with which Revolution intends to add to, DEP gave residents a proverbial shrug stating that this is the way they are allowed to review permits that residents should petition to have their regulations changed if they want something different and better, and that's that. This makes DEP's position concerning the regulation of air emissions to be that they are not an active regulator whose duty is to protect its citizen's air, but that DEP is there to be a passive provider of logistical support for the industry it is required to govern. In confronting this troubling and legally unsupported approach DEP appears headstrong in purporting, CCJ feels it is important to remind DEP that it is not just governed by its own regulations, but that it is simultaneously governed by our State Constitution which both undermines and supersedes DEP's current position.

Article I, Section 27 of the Pennsylvania Constitution, commonly referred to as the Environmental Rights Amendment, outlines the duties imposed on the Commonwealth and the protections afforded to its citizens, as well as their environment and natural resources. The text of Article I, Section 27 ("Section 27") identifies two distinct yet related fundamental rights and corresponding duties. *Pa. Env'tl. Def. Found. v. Commonwealth*, 161 A.3d 911, 931 (Pa. 2017) ("*PEDF*"). The first "inherent and infeasible" right guarantees "clean air, pure water, and the preservation of the natural scenic, historic and esthetic values of the environment." *Id.* The second grants common ownership to "all the people" of "Pennsylvania's public natural resources." *Id.* The final clause of the Environmental Rights Amendment establishes a trust, designating the Commonwealth and all its subdivisions as the trustee, with the Commonwealth's natural resources serving as the trustees, and all people and future generations as the beneficiaries. *Id.* The PA Supreme Court has further emphasized the importance of maintaining a robust evidentiary record to make informed decisions about regulating major air pollutant sources, thereby enabling the DEP to fulfill its constitutional duties. A well-reasoned decision requires a pre-decisional analysis, including careful consideration of public input from residents and a comprehensive account of the impacts a major emitting facility will have, given its location. Requiring that DEP and Revolution conduct a complete and robust cumulative impact analysis of historical and projected air emissions impacts will allow DEP to have sufficient information regarding the true state of the environmental health of the region when it evaluates the current permit application.

DEP can only make an informed decision regarding the environmental effects of its actions if it adequately understands what those effects are or will be. Likewise, DEP cannot be said to have acted with prudence when it acts on speculative or incomplete information. A trustee's discretion does not extend to decisions based on speculation. In *re Cope's Estate*, 50 Pa. D. & C. 189, 200 (1944); *Wood's Estate*, 197 A. at 641; *Hart's Estate*, 53 A. at 367. This is because speculation on the part of the trustee demonstrates negligence in "being ignorant of the facts which ordinary intelligence would have disclosed to him, or, if known, in not exercising his best judgment upon them." *Hart's Estate*, 53 A. at 367. Indeed, the Supreme Court remarked, "the trustee's fiduciary duties . . . [do] not equate to mere subjective judgment." *PEDF*, 161 A.3d at 933 (quoting *Robinson Twp*, 83 A.3d at 978).

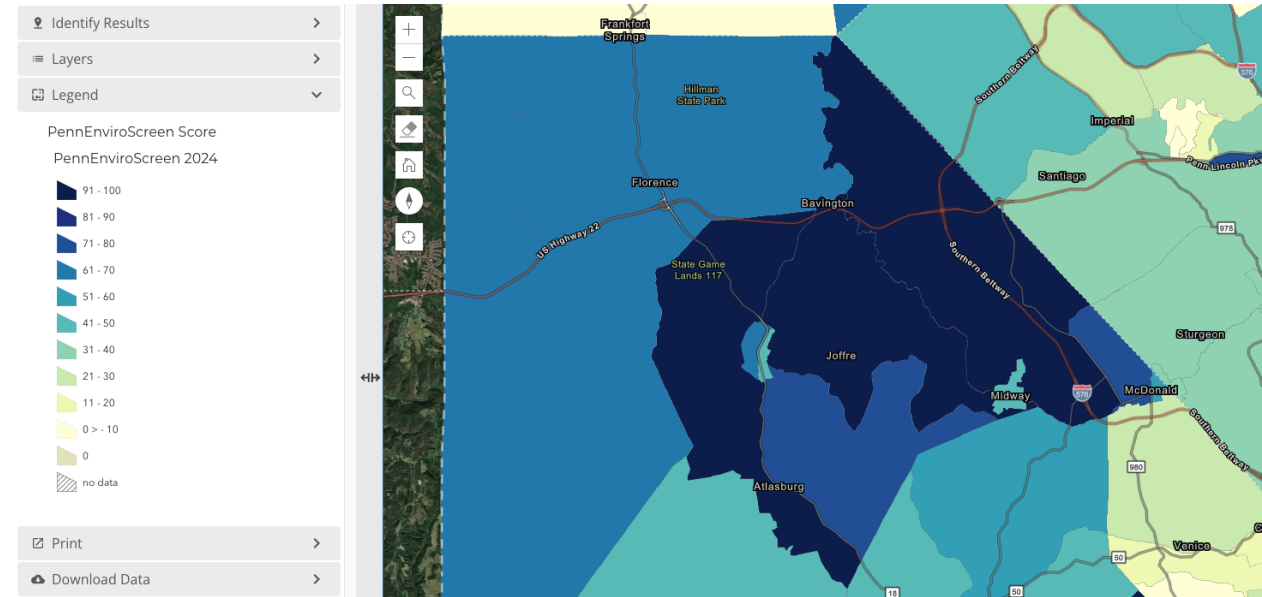
When these constitutional duties are combined with DEP's own policy and the location and proximity of environmental justice ("EJ") communities to Revolution, it necessitates that DEP conduct a deeper analysis of the cumulative impacts of the emissions in the current permit application. DEP must do a broader analysis of how the continued operation of Revolution and its air emissions will contribute to the cumulative, historic, and future impacts on the surrounding environment and communities. In September of 2023, the DEP implemented its EJ Policy with this stated purpose: "*This policy outlines measures that DEP will take to proactively educate, engage, and empower Pennsylvanians living in EJ Areas across the Commonwealth; explains how DEP will prioritize Environmental Justice in its compliance and enforcement activities... identifies mitigation and restoration practices for consideration by applicants for projects in EJ areas that have been impacted by environmental issues.*"

The Environmental Justice Screening and Mapping Tool (“EJScreen”) was established as a national standard to determine EJ areas and has been an integrated tool used by both FERC and the EPA. EJScreen shows that the EPA identifies two of the four census block groups as IRA Disadvantaged Communities, but not because of their low-income status. Block Group 2, Census Tract 7140, recognized as disadvantaged, has specific issues with hazardous waste, flood risk, and low life expectancy. Block Group 3, Census Tract 7137, also disadvantaged, is disproportionately affected by lead paint, flood risk, heart disease, and cancer, and has many children under 5 years old - a particularly sensitive population. While those are the only two block groups designated as disadvantaged, notably, the other two block groups both have high levels of cancer. Block Group 2, Census Tract 7110, is also exposed to toxic air releases, and many residents have disabilities. Block Group 1, Census Tract 7137, also has high levels of heart disease.



However, while EJScreen is an improvement over traditional low-income and minority assessments for EJ determinations, as used here by the project developer, its data is, in our experience, incomplete and does not always accurately reflect all EJ areas. That is why CCJ prefers the use of a resource created by the Pennsylvania Department of Environmental Protection’s Environmental Justice Office: PennEnviroScreen. PennEnviroScreen uses a formula and 32 indicators, both environmental and socioeconomic, to give each census block group a percentile. Those block groups with a final PES score above the 80th percentile or a pollution burden score above the 95th percentile are considered EJ areas.

Here, PennEnviroScreen identifies three of the four census block groups within one mile of the project as EJ areas, including the block group (Block Group 1, Census Tract 7137) that contains the project, which was not identified as an EJ area.



Block Group 1, Census Tract 7137, is disadvantaged, with a final score at the 96.6th percentile and a pollution burden at the 98.8th percentile for all block groups in Pennsylvania. They are in the 85.7th percentile for toxic air emissions and 67.2nd for compressor stations, which approval of this application would only make worse. Other indicators that affect living conditions where this block group received high scores include unconventional oil and gas wells (89th), hazardous waste and storage sites (88th), coal mining

(87.5th), and mining concerns (89.5th). As identified by EJScreen, this block group has a population with high incidents of heart disease (80.4th).

Block Group 2, Census Tract 7140, has a final PES score in the 90.5th percentile and is in the 98.7th percentile for pollution burden. Again, they are disproportionately exposed to high levels of toxic air emissions (79.1st) and compressor stations (95.9th), but they are also exposed to high levels of traffic (96th). This block group is over the 99.5th percentile for environmental effects due to the impact of unconventional gas wells (92.9th), hazardous waste and storage sites (89.5th), coal mining (83.5th), and mining concerns (94.9th). There are also high heart disease (80.4th), cancer (74.2), and asthma (73.5th) rates.

Block Group 3, Census Tract 7137, is one of the most disadvantaged block groups in the state, with a final PES score in the 95.6th percentile and a pollution burden over the 99.5th percentile. It is in the 90.6th percentile for toxic air emissions, 91.3rd percentile for traffic, while receiving scores in the 92.1st percentile for toxic water emissions and 80.6th percentile for compressor stations. Residents are also affected by conventional gas wells (80.8th), unconventional gas wells (88.6th), hazardous waste and storage sites (92nd), and mining concerns (89.8th). In addition, there are high rates of heart disease (80.4th). The only block group within one mile of the project that is not an EJ area is Block Group 2, Census Tract 7110. However, this block group still received high scores for toxic air emissions (84.8th), traffic (92nd), conventional gas wells (86.5th), and mining concerns (80.7th).

The communities near Revolution are already exposed to pollution. Pollution from compressor stations can cause burning eyes and throat, skin irritation, headaches, nausea, vomiting, cancer, and cardiovascular and respiratory risks (which many people in these block groups already have). Pipelines and unconventional gas wells, which are likely to increase in the area to feed the expansions, come with additional health impacts. Unconventional gas wells increase the risk of groundwater contamination, exposing nearby residents to radioactivity, salts, and chemicals used in fracking fluid. This means residents in these block groups are exposed through the air they breathe and the water they drink to stay alive. Additionally, pollutants from all the related infrastructure can have health impacts up to 10 miles.¹

CCJ is presenting all these data points and analyses of the communities surrounding Revolution to give DEP the context we believe it needs to fairly address the impacts that the emissions from the proposed plan approval will have. Because the residents of Smith Township and the students of Burgettstown Area School District will not just be forced to deal with the health and environmental impacts of Revolution's supposed 49.5 tpy of VOC's. It will be subjected to those impacts in addition to the ever growing cumulative exposures from current and historic air pollution. It is not solely the highly polluting nature of Revolution, the history of dangerous noncompliance by ETC, nor the undeniable environmental overburden of these communities that explain why DEP must implement a cumulative impact analysis as part of the air permit process for Revolution. It is also because of the rapid development on the horizon for these communities. Whether it's the proposed massive data center/natural gas power plant complexes in nearby Starpointe in Hanover Township, or at Zedikar Station in North Strabane Township, or Project South Mon, a 4.3 GW natural gas power generation hub that is going to be built somewhere in SW PA, massive new air polluting infrastructure is coming. DEP must position itself to adequately address the environmental concerns and community impacts arising from this new regional push for industrial development. And one of the clearest and most protective ways in which DEP can do this, while maintaining compliance with its constitutional duty, is to begin conducting the research and analysis that account for the cumulative impact current and historic sources have on communities and their environments now. Integrating this analysis and reporting into Revolution's air permit application presents a perfect opportunity to do just that, as the emissions and impacts of Revolution, as well as the infrastructure it will support, are directly tied to the existing, historic, and future sources of those impacts.

Thank you for your consideration. If you have any questions, please contact me anytime.

Respectfully,

¹ Oil and Natural Gas Production (ONGP) Health Concerns, PA. DEP'T. OF HEALTH
<https://www.pa.gov/agencies/health/programs/environmental-health/oilgas.html#accordion-b14cb09678-item-db8e92c827>.

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