

# 3231



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June 17, 2019

Via *eComment*  
Environmental Quality Board  
Rachel Carson State Office Building  
16th Floor, 400 Market Street  
Harrisburg, PA 17101-2301

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IRRC  
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RE: Regulation #7-536: Air Quality Fee Schedule Amendments  
49 Pa.B. 1777 (April 13, 2019)  
IRRC # 3231

The Pennsylvania Independent Oil & Gas Association (PIOGA), on behalf of its approximately 450 members committed to safe and environmentally-responsible operations to produce and transport conventional and unconventional natural gas in an economically competitive market, is responding to the above-referenced proposed rulemaking described as follows:

This proposed rulemaking amends existing requirements in Subchapter F and existing air quality plan approval and operating permit fee schedules in Subchapter I. It also proposes new fees in Subchapter I to address the disparity between revenue and expenses for the Department of Environmental Protection's (Department) Air Quality Program. These increased fees and new fees would be used to provide a sound fiscal basis for continued air quality assessments and planning that are fundamental to protecting the public health and welfare and the environment. Increased funding for the Air Quality Program will also continue to allow for timely and complete review of plan approval and operating permit applications that provides the certainty businesses need to expand or locate in this Commonwealth.

While PIOGA supports all facets of our industry, we acknowledge that this proposal primarily impacts unconventional (shale) operations. Accordingly, as we agree with and

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support the comprehensive and well-stated comments of the Marcellus Shale Coalition (MSC) on this proposal, we will not clutter the record with additional corroborating material.

Respectfully submitted,

A handwritten signature in black ink that reads "Kevin J. Moody". The signature is written in a cursive style with a large, sweeping "K" and "M".

***Pittsburgh Office***  
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