

Remarks for DEP Citizens Advisory Council Public Comment - April 09, 2024

Thank you for the opportunity to speak. My name is Susan Sunhee Volz and I'm an advocacy coordinator with Clean Air Council. We are a statewide member organization fighting for everyone's right to a clean and healthy environment. We have many members in the area of the KeyState facility who would be impacted by the project.

First, I would like to express my extreme concerns about the procedural injustices and failures of community engagement from the Department of Energy and ARCH2 partners. The DOE has said that it "aims to prioritize hearing community members from project host communities." However, with such little information available about specific projects, including their locations, it has been nearly impossible for communities to determine if they are indeed host communities. This has been especially true for our members in Southwest Pennsylvania, who are unsure how they will be impacted by the ARCH2 network. Furthermore, impacted communities have been excluded from the negotiation process. Although hub applicants were required to submit a community benefits plan, applicants were not required to release their plans to the public, let alone engage stakeholders and impacted communities when designing their proposals. I bring all this up to ask, what is DEP's plan for engaging communities, many of whom are still unaware that hydrogen hubs are in development?

I would now like to express my concerns about the one project the Council is aware of in Pennsylvania, the KeyState to Zero project. Proposed for a 7,000 acre tract of land in Clinton County, this "gas-synthesis" plant will use the methane in fracked gas as a feedstock to produce a range of products, including blue hydrogen, ammonia, urea, and nitrogen fertilizer. The project also claims it will use on-site carbon capture and storage. There is a lot that is unknown about the project. For example, carbon capture is unproven at scale and is not currently used at any U.S. power plant. It is unknown exactly how this project intends to achieve a more than 99% carbon capture rate that developers have claimed when this has not yet been achieved in practice anywhere before. It is also unknown if the tract of land on which this project would be built is even suitable for carbon sequestration. Apparently, no test wells have been drilled to establish that suitability. It appears that this site has been chosen essentially for its proximity to Frontier's fracking wells. The process for determining storage potential can take decades to complete; this has not been done nor is there any indication of when it will be done.

The only thing that appears certain is that the KeyState project will maintain fossil gas production in Pennsylvania for several decades. This will continue to negatively impact communities long exposed to the health and economic harms of the fracking industry. Blue hydrogen can actually be worse for the climate than burning gas or coal. The total greenhouse gas footprint of methane-based blue hydrogen is more than 20% greater than burning natural gas or coal for heat, according to a peer-reviewed study of lifecycle emissions. There are models of economic revitalization that show ways to decarbonize that are cheaper and better for sustainable job growth. With that in mind, it is clear that the KeyState project and ARCH2 hub are more false climate solutions from the gas industry that will not advance our state climate goals. Thank you.

