

Tate, Michele

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**From:** Lisa Graves-Marcucci [lisagmarcucci@gmail.com]      2009 MAR 17 PM 3:30  
**Sent:** Monday, March 16, 2009 12:14 PM  
**To:** EP, RegComments      INDEPENDENT REGULATORY  
**Cc:** Lisa Graves-Marcucci      REVIEW COMMISSION  
**Subject:** Marcellus Shale Gas Well Drilling, Proposed Rulemaking, Public Comments

Dear Environmental Quality Board Members:

I am writing in support of the proposed increased fee schedule for all gas well drilling permits issued in the Commonwealth of Pennsylvania. Additionally, I agree the increased fees should be used to hire more PA DEP staff to oversee the rapidly and dramatically increasing increasing the number of gas well drilling permits and operations.

In addition to the increased fee schedule and increased staff, I also request the PA DEP require more disclosure and transparency of all gas, oil and energy companies seeking permits for drilling in Pennsylvania.

Specifically, I request the PA DEP require the following:

- Full disclosure to the public and local government officials of all fracking chemicals, lubricants, surfactants – including total amounts – used by each gas well drilling company, at each specific operation.
- Full disclosure to the public and local government officials of size of waste water pits, ponds – and a list of all fracking chemicals, lubricants, surfactants – including totals – that will be held on site, and for what length of time.
- Full disclosure to the public and local government officials of which water sources will be used by the drilling company operations, at each specific site.
- Full disclosure to the public and local government officials of the amount of water that will be used in each specific drilling process.
- Full disclosure to the public and local government officials of where waste water will be taken – and written proof that it is an approved facility for handling, and treating drilling waste water.
- Require storm water management control plans and safeguards for all drilling sites, regardless of the acreage. Landowners and local governments should not be responsible for any problems that may arise as a result of well drilling and create storm water management problems. Storm water management and control should be the full responsibility of the drilling company.
- A mandatory 8-hour hold period for all cement casings to completely set before drilling operations begin and/or proceed. Require a PA DEP site inspection to ensure this holding period is fulfilled.
- Increased air permitting requirements at all drilling sites – including emissions from drilling

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equipment, tanks, ponds and fracking chemicals.

- Increased bonding at all sites.

Without more transparency and accountability, our Commonwealth runs the risk of allowing the next generation of "robber barons." Over one hundred years ago, the coal industry ravaged Pennsylvania lands and left deadly legacies of mountainous wastes and miles of acid mine drainage: this a direct result of lacking oversight and regulatory restrictions. Many citizens of this Commonwealth see the oil and gas drillers gearing up to do the same. We must learn from history and avoid the same mistakes.

We cannot allow any industry to dictate their practices based on economics alone. Proper protections for humans and the environment -- especially our drinking water sources -- must be required BEFORE any additional permits are granted.

We respectfully request the PA DEP require more disclosure, more transparency and more protections.

Thank you,

Lisa Graves Marcucci

These comments are in response to the following:

To read the full announcement as published in the PA Bulletin:

<http://www.pabulletin.com/secure/data/vol39/39-7/255.html>

PA DEP Press Release, Gas Well Drilling Proposed New Fee Schedule:

<http://www.ahs2.dep.state.pa.us/newsreleases/default.asp?ID=5427>

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