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January 30, 2010

ENVIRONMENTAL QUALITY BOARD

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477  
Board at RegComments@dep.state.pa.us

Re: The Environmental Quality Board (Board) proposes to amend 25 Pa. Code Chapter 95 (relating to Wastewater Treatment Requirements).

Gentlemen/women:

First, please know that we applaud your efforts in the establishment of wastewater treatment requirements regarding the flow back water created in the development of the Marcellus gas play. Living in the Marcellus gas play, and seeing the industrial development of our countryside has given us a first hand observation of the future of Pennsylvania, and what this development can mean to our communities, economy, and environment. It is due diligence on the part of our state, to insure that our environment is not left in degradation, whether it be land, air, or water. The gas industry is operating with an aggressive plan to develop this region, and, with that, huge amounts of fresh water, water having tds in cases below 500 ppm are being used in this process. Water is being discharged from pristine tributaries in the Susquehanna River Basin, such as the Meshoppen Creek. That being said, with gas well projections to the year 2020, it is not unreasonable to expect perhaps as many as 19,000 Marcellus gas wells in our state.  
[\[http://www.pamarcellus.com/EconomicImpactsOfDevelopingMarcellus.pdf\]](http://www.pamarcellus.com/EconomicImpactsOfDevelopingMarcellus.pdf) Pg 34.  
[\[http://www.pasenatepolicy.com/Testimony/MarcellusShale\\_Williamsport/Sovereignty\\_Tax\\_Handout\\_\(2009-04-09\)\\_\(2\).pdf\]](http://www.pasenatepolicy.com/Testimony/MarcellusShale_Williamsport/Sovereignty_Tax_Handout_(2009-04-09)_(2).pdf)

With the development of 19,000 wells, we are looking at the withdrawal of perhaps at 7.5 million gallons per well, a total of 142,500,000,000 gallons of water. This water perhaps calculated at a 30% flow back rate, we can expect approximately 42,750,000,000 gallons to be treated and discharged in PA waters. Because of this, we are expressly stating that the old adage, dilution is the solution to pollution is no longer an avenue. With so much water given the 500ppm TDS concentration as acceptable to discharge, we feel that 500 ppm is not an acceptable target. Especially since in periods of flooding, and mishaps, problems can and will occur with water having beyond substantially higher TDS than 500 ppm will conceivably flow into PA watersheds. Also, "Pennsylvania is one of only two states, along with Alaska, that lacks any regulations governing the construction and protection of private drinking wells,"  
[\[http://www.dti.org/Document.DocId=328 pg 20\]](http://www.dti.org/Document.DocId=328). Having had the experience of living along the Susquehanna River with a drinking well, we have experience of how such water can easily become contaminated, and not suitable for drinking. So, because of the drinking water issue, and the fact that PA businesses involved in recreation and tourism, who have been long established depend on the watersheds/rivers, we suggest that a concentration of perhaps 200 ppm, which is much closer to an acceptable drinking quality be imposed. Most purchased bottled water has ppm of less than 100. So we are not asking for the extravagant here, just a more reasonable level to insure the quality of our streams. The gas industry as presented is here to stay, and for the duration. The taxpayers of Pennsylvania must not be left holding the bag as in the past with the coal mine drainage, abandonment, reclamation, and dealing with orphan gas/oil wells.

Sincerely,

David & Emily Krafjack

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