



From: Stephanie Simmons [snsimmons@gmail.com]
Sent: Wednesday, February 10, 2010 11:41 PM
To: EP, RegComments
Subject: Considered Amendments for TDS levels, etc.

To the Environmental Quality Board,

Now more than ever it is important that the Environment Quality Board implement the tools necessary to protect the natural resources of our commonwealth and quality of life for all.

I support the amendments under consideration concerning oil and gas well drilling and further hope that they are 'grandfathered' across the board to include wells already in operation, and those in the permit process.

Water is our sacred currency-without it life as we know it becomes challenged on every level. The United Nations has noted that water quality is a global concern. We have been blessed to live in a region that has historically been water rich, with a quality rarely found elsewhere. It is imperative that we protect that currency with every tool at our disposal, and that begins with agency regulation and oversight by those who are given the charge of its protection.

The current regulations are far from sufficient, so the recognition that change was necessary has come at a critical juncture. It is not comprehensive, however, to there needs to be a recognition that fluidity is needed as we collectively move forward focused on the purpose of protecting our water quality.

TDS levels must be established and regulated- there must also be a focus on chemicals utilized in the drilling process be reported concerning frequency, concentration, and design. If there is a modification of that proverbial coattail, then that change must be reported as well. This is a necessary component to regulation and remediation. Municipalities must be aided by commonwealth authorities that oversee the permitting process. It is a hazard to water quality in the state to not know what is being used in the drilling process, what will be present in water that must be treated, and what will be left behind in the ground that can leech into wells, sewers, and aquifers. It is important to make the distinction between AMD and "new discharge" which may contain designer chemicals that most water treatment in PA cannot remediate. This puts water quality at risk, so disclosure must become an important part of the "new discharge" clause. The costs estimated are fair necessary. There are new technologies being developed that can increase remediation and reduce cost. The unique mineral structure of the commonwealth brings many gifts but also many concerns that must be managed so that all can benefit from the opportunities that our resources bring to improve domestic energy self-sufficiency and bridge fuels for our economic future. To be clear: this cannot come at the expense of the quality of life and beauty of our state.

As we have seen from recent challenges to our water quality, acid is a major issue. Low pH can significantly reduce our opportunities to economically and safely remediate without profound damage to our rivers and streams. We must get in front of the problem, rather than find ourselves in 'react' mode. We cannot afford to allow our waterways to become compromised by a lack of regulation, or by a violation of those regulations.

I encourage every step to be taken to increase the number of well inspectors, and I also fell strongly that there needs to be quarterly follow-up on those areas where water quality has been impacted by these discharges. Well drilling should not be expanded anywhere in the commonwealth until we are able to effectively monitor the

sites that we have. No government official, no matter how high the office, should circumvent the process established and long held effective.

There should be some consideration on where water is drawn from in order to operate these wells. That will also impact TDS levels if waterways that have significant drain may also experience effluent release. Rivers and streams will need consistent monitoring to ensure quality.

Collection pond failure must also be watched, since that can impact landowners and municipalities greatly. Curing of well casings to high pressure well standards and checking for leaks can also reduce contamination. The fox cannot be in charge of the proverbial hen house; regulation must come from those charged to protect water quality. Deferring to the higher regulatory standard when it applies (NPDES permit limitation established under Chapter 92) is highly supported.

These modifications are a strong start, and should be implemented quickly and supported greatly by an industry that has much to gain in operations within PA, and should recognize that a higher standard must be honored in order to ensure that all business: recreation, forestry, hunting, fishing, and overall quality of life for residents and wildlife is in their best interest as well. Stewardship is a collective responsibility, and there is no longer any room for business practices that do not measure the true cost of operation within the commonwealth includes protecting our resources for generations to come.

Sincerely,
Stephanie N. Simmons
Sierra Club, Allegheny Group
Water Chair
Lifetime PA resident

Sent from my iPhone