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To the Environmental Quality Board,

I understand that you are considering updating and tighten existing regulations to address the new technology and risks. I strongly urge that you do so.

Here are three points of major concern.

#1 – Cement. The commission should require a better quality of cement mixture be used to prevent pollution and provide safer conditions. For example, compared to PA law, Texas requires a 72-hour compressive strength standard of at least 1,200 psi across critical zones of cement at the bottom of the casing seat where the highest pressures and stresses are likely to be encountered and in places where the well bore passes through aquifers and drinking water. By comparison, PA DEP’s definition for cement sets a 24-hour compressive strength standard of at least 500 psi. States like Texas have found that standard insufficient to prevent vertical migration of fluids or gas behind pipe. Also, remember the Austin Dam in Pa. It did not last 3 years and a whole town in Pa was wiped out. That concrete was thought to be safe.

#2 - Protection of Water Supplies. DEP has proposed a number of important revisions to the Chapter 78 regulations to clarify what constitutes an adequately restored or replacement water supply. However, DEP did not recommend any revisions to set a timeframe for acting upon a complaint filed for pollution or diminution of a water supply as a result of drilling or operating a gas well. Experience tells us that folks without water are often ignored for weeks, as gas-drilling companies deny responsibility for polluting drinking water supplies and tie things up in court. The Gas Companies should also be responsible for taking samples of all water prior to drilling and when accidents occur, then test the before and after.

#3 - Blowout Preventer. We need only look to the BP disaster in the Gulf and the recent gas well blowout in Clearfield to know the grave danger of well blowouts. Injury, fire, explosion, spills, gas venting, equipment damage, water pollution, and other environmental destruction and are possible. Once the surface casing is installed and cemented, ALL wells should be drilled with a Blow-Out Preventer. No exceptions.

We need to have these resources(gas), but we also need to maintain the integrity of our states natural resources. Love Canal and other areas have proved beyond a shadow of a doubt that people will leave the pollution and that it takes decades to restore the damage that can be done by chemicals. BP has shown us that men do make mistakes. Let’s do the best we can to give us the best chance we have to keep our environment pristine.

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