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Proposed Oil and Gas Casing and Cementing Regulations

Environmental Quality Board  
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It is absolutely necessary that casing and cementing regulations protect the public health, safety, and welfare. Casing requirements must reflect technology which is state-of-the art in the oil and gas industry. Because poor casing and cementing can cause contamination of fresh water aquifers, regulations must be targeted to prevent migration into these aquifers. We support the eight hour rule proposed by DEP which requires that there be no activity at the well pad which could disturb the curing of the cement. DEP should be notified of the beginning and ending of this period of time.

The regulations should make it easier for those affected by contaminated water to seek a remedy. It is unconscionable that a drilling operation can supply water which does not meet drinking water standards. At a minimum, water should meet drinking water standards. We support the rule that requires an operator to report any complaints to DEP within 10 days.

Recent incidents in the Gulf of Mexico and Clearfield County have demonstrated that regulations require proper installation and testing of blowout equipment. It is also important that redundant systems to prevent blowouts should also be required.

Because production wells can be operated for decades, regulations should make certain that the long-term integrity of the well is protected. We support the requirement that required operators to test wells quarterly and report and signs of degradation or other problems. Finally, we support the requirement of predrilling surveys of water quality be conducted by the drilling operator. The results must be reported to DEP and surface landowners.

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