



**SOMERSET
CONSERVATION DISTRICT**

Conserving Natural Resources for Our Future

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Environmental Quality Board
P. O. Box 8477
Harrisburg, PA 17105-8477

July 20, 2010

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ENVIRONMENTAL QUALITY BOARD

Dear Environmental Quality Board,

The Somerset Conservation District has the following comments on the proposed changes to existing requirements on drilling casing, cementing, testing, monitoring and plugging of gas wells.

The current recommendations do not specify the pressure that the casing will have to withstand under the fracturing process. The casing and cement tolerances should be clearly specified. The regulation should provide enforceable numbers for pressure requirements for casings and cement. The current recommendations only mention that pressure tolerances will be a component.

The recommendation states that the gas well operator is responsible for potable water supplies within 1,000 feet of the well within 6 months of drilling. Restimulation of the well is not discussed. The water supply is only protected by this distance for 6 months after drilling. If water supplies are impacted after 6 months there is no method for the landowner to seek compensation or a new water supply. This is not acceptable.

The distance restriction is not appropriate. It stems from vertical drilling operations. Marcellus Shale drilling is not vertical and the distance that the operator should be responsible for should be much greater than 1,000 feet.

Thank you for the opportunity to comment on the proposed regulations.

Sincerely,

Len Lichvar
District Manager
Somerset Conservation District

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