

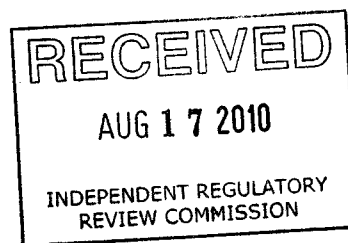
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**Review of 25 PA. Code Ch. 78 Proposed Rulemaking on the Behalf of
Highland Sewer and Water Authority by Casselberry & Associates**

Contact Information:

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Casselberry & Associates has reviewed the proposed rulemaking and has the following comments:

- 1) The cement job log, referenced in 78.1 Definitions, should be sealed by a registered professional geologist or registered professional engineer.
- 2) The deepest fresh groundwater, referenced in 78.1 Definitions, should be defined by determining the elevation at which the groundwater total dissolved solids content reaches the 500 mg/l public drinking water limit. If no drilling records documenting the elevation of the 500 mg/l total dissolved solids level are available within a 1.0-mile radius of a proposed gas well, a test well should be drilled to develop this information.
- 3) Would the provisions of 78.75a allow water suppliers to submit detailed wellhead protection studies to the Department proposing an area of alternative methods to protect their water supplies? If so, Highland Sewer and Water Authority will pursue this avenue for the three well fields it utilizes as supply sources.
- 4) Under 78.82. Use of conductor pipe, (2), grouting of the conductor pipe should be required if it breaches the water table.
- 5) The minimum interval for centralizers listed in 78.83 (2)[(b)](c)

should be reduced from 150 to 100 feet.

6) The provision for allowing a single string of surface casing through all water zones, including fresh, brackish and salt water, if there is no fresh groundwater use within a 1000-foot radius of a proposed gas well, presented in 78.83 (2)(b)(c), should be eliminated. The 1000-foot exclusion provides no protection for future groundwater use and also ignores the need to protect groundwater for maintenance of base flow quantity and quality in perennial streams.

7) Under section 78.83 (g), the maximum separation between centralizers should be limited to 100 feet.

8) Under section 78.83 (h) and 78.83 (j), any cementing done on top of a cement basket should be placed with a grout pump and tremie pipe from the bottom of the annular space upward to ground level instead of dumping the cement from the surface. This is necessary to prevent fractioning or dilution of the cement.

9) Under 78.83a. Casing and cementing plan, the plan should be sealed by a registered professional geologist or registered professional engineer.

10) Under 78.84. Casing standards, minimum casing wall thicknesses should be established for surface casings that mirror the Departments requirements for public water-supply wells.

11) Under Section 78.122. Well record and completion report, this report should be sealed by a registered professional geologist or registered professional engineer.

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INDEPENDENT REGULATORY
REVIEW COMMISSION

From: Jim Casselberry [jrcasseljr@aol.com]
Sent: Sunday, August 08, 2010 9:25 PM
To: EP, RegComments
Subject: Chapter 78 Comments
Attachments: C&A Chapter 78 Review.pdf; ATT00002..txt

Attached please find a file with Casselberry & Associates comments on the proposed Chapter 78 Rulemaking.

These were prepared on the behalf of Highland Sewer and Water Authority.

Regards,

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