



# LRCA

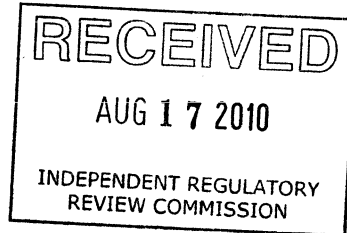
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Post Office Box 368 • Scranton, PA 18501-0368

**Phone:** (570) 347-6311 • **Fax:** (570) 207-7590 • **E-mail:** lrca@lrca.org • **Website:** www.lrca.org

August 5, 2010

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



RE: Chapter 78 Regulations

Members of the Environmental Quality Board,

The Lackawanna River Corridor Association (LRCA) and the Lackawanna Valley Conservancy (LVC) are affiliated conservation organizations with a shared mission to conserve and protect the natural resources, with a particular focus on water resources, in the 350 square mile Lackawanna River Watershed in Susquehanna, Wayne, Lackawanna and Luzerne counties in northeast Pennsylvania.

We support stronger regulations through Chapter 78 to increase safe operations and protect water resources from the impacts of oil and gas drilling operations.

Drilling Safety standards must insure that migration of gas and drilling or fracking materials does not communicate with ground water sources. Well casing and cementing requirements must address the new technologies and pressures. Well casings should be required to extend to a greater depth and have cementing and grouting with greater integrity to withstand the higher thresholds of pressure delivered with hydrofracking.

Compressive strengths of cement need to be raised to above 1200 psi/per72 hrs. Cement ticket definitions need to require water temperature and pH records; WOC time needs to be recorded and extended to achieve compression standards prior to casing use.

Requirements for both operator and DEP reaction times for accident reporting and response need to be upgraded. Replacement and restoration of water supplies as an outcome from accident response events needs to be redefined and fast tracked. Redundancy in Blow Out Preventer Control needs to be required on the rig and at a remote location on the drill site. The use of open lagoons for storage of drill fluids and muds should be disallowed. All such materials should be stored in bladders placed in lined pits.

Lastly, we ask that you consider that Pennsylvanians can survive without shale gas but we cannot survive without potable water and a healthy aquatic ecosystem.

Sincerely,

*Michael M. Morin*

President, Lackawanna River Corridor Association

*Bernard McGurl*

President, Lackawanna Valley Conservancy

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**From:** Director, Lackawanna River Corridor Assoc. [director@lrca.org]  
**Sent:** Monday, August 09, 2010 2:40 PM  
**To:** EP, RegComments  
**Cc:** Paul Bechtel; Alana Roberts; Ally Serio; Lambert, Angela; Anita Lohin; Barb Semian; Bernard Mcgurl; Brian Kaufman; Doug Heller; Douglas Sheldon MD; Elizabeth Zygmunt; JACK FINNERTY; Jeff Webb; John Gable; Kathleen O'Hara; Kevin Leibold; Kevin Scotch; Leonard Gorney; Maggie O'Brien; Michael Morin; Michelene Kennedy; Mike Hanley; Ned Fetcher; Pat Cuff; Ruthann Martin; Robert Savakinus; Joeseeph Evans; James M Talarico; Eunice Alexander; Ernest Keller; Donald Broderick; Dave Byman; Dave Brown; Barbara Giovagnoli; John Hambrose  
**Subject:** CH 78 Oil & Gas regs  
**Attachments:** EQB re.ch78 O&G regs.doc

PA Environmental Quality Board,

Attached, please find a letter addressing comments to the Chapter 78 Oil and Gas regulations from the Lackawanna River Corridor Association(LRCA)and our affiliate The Lackawanna Valley Conservancy (LVC).

In addition to the comments contained in the attached letter, both organizations remain concerned about the long term implications of the shale gas industry in Pennsylvania. The probability of having upwards of 200,000 well bores and a million plus horizontal fracture bores created over the next 40 years will require constant vigilance by the Commonwealth and its Citizens to prevent the intrusion of residual drilling and hydrofracturing materials from contaminating our surface and ground waters.

We are not confident that existing regulations under Chapter 78 or in other sections of the Pennsylvania Code provide sufficient regulation or control over the entirety of life cycle issues related to the composition, use, and disposition of hydrofracturing materials and byproducts.

We suggest that the Commonwealth consider a moratorium on hydrofracturing in order to develop a regulatory process to safeguard the waters of the Commonwealth from accidental or incidental harm from the disposition of these materials and to reexamine the procedures to close and seal all wells as they are removed from production.

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

Sincerely, Bernard McGurl, Executive Director, Lackawanna River Corridor Association