



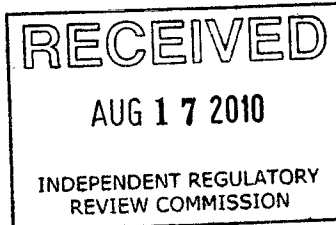
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August 9, 2010

VIA ELECTRONIC MAIL

Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477



RE: EQB proposed rulemaking to amend 25 PA Code Chapter 78 (relating to Oil and Gas Wells)

Dear Members of the Board,

Please accept these comments on behalf of the Pennsylvania Independent Oil and Gas Association (PIOGA) which is the non-profit trade association for Pennsylvania's oil and natural gas producers. We promote the general welfare of the state's crude oil and natural gas exploration and production industry, and represent over 800 member companies of which approximately 75 percent are engaged in Marcellus Shale production. We ask that the Board Members consider the following comments on 25 PA Code Chapter 78: Oil and Gas Well Casing and Cementing.

While PIOGA understands that a properly cased and cemented oil and gas well is critical to protecting fresh groundwater and public safety, we appreciate the opportunity to submit comments on the drafted proposed rulemaking as some of the proposed regulations need clarification and/or corrections. PIOGA members served on both the *Technical Advisory Board Work Group* and also the *Marcellus Shale Coalition Work Group* and PIOGA is fully supportive of both work group comments that have been submitted to the EQB.

Additionally, PIOGA would like to comment on behalf of our non-Marcellus operators that we have serious concerns regarding the additional inspections and reporting requirements. Many of our smaller operators have limited staff and the increase inspections will cause an unnecessary burden on shallow operators.

We respectfully petition DEP and the EQB to revisit this proposed regulation change and address the areas that we have expressed our concerns. Thank you for accepting our comments.

Sincerely,

Louis D'Amico
President & Executive Director

From: Danielle Boston [danielle@pioga.org]
Sent: Monday, August 09, 2010 4:13 PM
To: EP, RegComments
Cc: Lou D'amico
Subject: Comments for proposed rulemaking for amendments to 25 PA Code Chapter 78 (relating to Oil and Gas Wells).
Attachments: PIOGA Comments to EQB on Chapter 78.pdf

Sent on behalf of Louis D. D'Amico, President & Executive Director

Thank you for the opportunity to submit comments on the proposed rulemaking for amendments to 25 PA Code Chapter 78 (relating to Oil and Gas Wells).

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