## **Cooper, Kathy**

From: Sent: To: Subject: Rebecca Renner [rrenner@nasw.org] Thursday, August 05, 2010 1:12 PM EP, RegComments Chapter 78 Regulations AUG 1 7 2010

INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Environmental Quality Board,

Thank you very much for considering ways to strengthen Pennsylvania's regulations that govern drilling in the Marcellus Shale. As someone who has lived in Williamsport for 15 years, I believe that I can see the peril and the promise of the increasing drilling activity. The potential economic benefits and environmental pitfalls are well known.

I am relieved to know that Pennsylvania is to have some of the toughest standards for emissions of sulfate and chloride -- these standards are necessary given the likely increase in drilling and the need to dispose of process water.

I would like at this time, to comment on the proposals for tighter standards that apply to cementing the casing, air quality controls and incident reporting. Overall I support the analysis conducted by Harvey Consulting. In particular I support the Consulting group's recommendations for cement standards that are as strong as those in Texas. My understanding is that poor cementing was the cause of the Dimmock water problems. In addition, when there is a situation in which citizens water has been contaminated, it seems to me that actions to provide these people with drinking water need to be taken in a timely way, in advance of any long-term arguments about causation. In addition, when it comes to blow out preventers and the need for them -- we have only to look to the Gulf Coast for a gargantuan example of why such devices are necessary and why it is necessary that they work well. On a more local scale, the blow-out that occurred near Clearfield could have been prevented had the company installed a blowout preventor.

Lastly, I would point to the situation that occurred last fall on Dunkard Creek in western Pennsylvania where a golden brown algae bloom created toxins that killed practically all of the aquatic life in over 30 miles of stream. While to my knowledge, unproven, it seems reasonable to hypothesize that cysts of this algae may have come to Pennsylvania from Texas in water containers that traveled up from there. If possible, it would be a great benefit to require water carriers to empty out, rinse, and disinfect their containers before they are used on our waterways.

Thank you very much for your consideration,

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