

Cooper, Kathy

From: SHERRI L. GRASMUCK [sgrasmuc@temple.edu]
Sent: Thursday, August 05, 2010 9:41 AM
To: EP, RegComments
Subject: Chapter 78 Rulemaking



Hello, I am Sherri Grasmuck,

249 Happy Hills Road

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I am writing to encourage the EQB to adopt strong protections to improve the safety of oil and gas wells in Pennsylvania and to preserve the quality of our water supplies.

We support the inclusion of the language proposed by the Harvey Consulting report in the new Chapter 78 regulations. I do so because the following points are important considerations in ANY planning for this development.

1. Casing and cementing regulations are necessary to the public health, safety, and welfare. 2. Casing regulations should reflect state-of-the-art technology in the oil and gas industry. Much has been learned about casing and cementing of oil and gas wells in the past several decades. Cement standards should be tightened. The industry needs to impose quality assurance standards on the cement used. The industry knows how to ground water pressure in the well where the casing ends and can take steps to prevent migration of gas into fresh water zones.
3. The regulations should be targeted at preventing gas migration into drinking water supplies. Poor casing and cementing can cause contamination of fresh water aquifers. Cement needs time to cure before it is disturbed. DEP proposes an eight-hour period during which no activity is to occur at the well pad which may disturb the cement. DEP should be notified at the beginning and end of the eight-hour period to ensure that the minimum eight-hour period is not breached.
4. Once a water supply has been affected by drilling, the regulations should make it easier to remedy affected surface owners' or occupiers' complaints of contaminated water from drilling and extraction operations.
5. The regulations should provide for proper installation and testing of blowout equipment. The BP oil spill in the Gulf of Mexico and EOG Resources blowout incident in Clearfield County are reminders that properly functioning safety equipment are necessary to prevent catastrophes. In both cases blowout preventer devices failed because they were not properly installed and tested. Redundant systems to prevent blowouts should be required.
6. The regulations should ensure the long-term integrity of the well.
7. Pre-drilling surveys of water quality conducted by the drilling operator must be reported to the DEP and surface landowner.

Thank you,

Sherri Grasmuck, Property owner in both Eagles Mere as well as Philadelphia