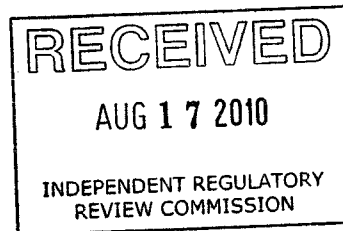


**From:** Tom Burkholder [toburk@comcast.net]  
**Sent:** Sunday, August 08, 2010 2:13 PM  
**To:** EP, RegComments  
**Subject:** Chapter 78

Thomas B. Burkholder  
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We are 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.

We believe that stronger casing and cementing regulations are necessary to the public health, safety, and welfare as natural gas can migrate up the well through cracks in poorly cemented wells. Casing regulations should reflect the current technology in the oil and gas industry. Over the past several years, much has been learned about casing and cementing of oil and gas wells and cement standards should be tightened. The industry needs to impose quality assurance standards on the cement used. The industry knows how to groundwater pressure in the well where the casing ends and can take steps to prevent migration of gas into fresh water zones.

It is imperative that the regulations 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. An eight-hour period has been proposed 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.

Also, in the event 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. An appropriate regulation should require that any replacement water should meet drinking water standards at a very minimum.

It is important that the Department know when a complaint about water supply has been lodged with the operator. We support the requirement that the operator notify the Department within 10 days, if not sooner, of a receipt of a complaint.

In addition, the regulations should provide for proper installation and testing of blowout equipment. Recent incidents here in Pennsylvania and in the Gulf of Mexico

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.

Further, the regulations should ensure the long-term integrity of the well as production wells can be operated for decades. The proposed regulations (Section 78.88) require operators to test wells quarterly and report signs of problems or degradation. We support these inspection requirements.

Thank you for your consideration of these comments.

<http://www.portal.state.pa.us/imageserver/plumtree/portal/public/img/sp.gif>