



**Cooper, Kathy**

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**Sent:** Saturday, August 07, 2010 11:49 AM  
**To:** EP, RegComments  
**Cc:** Bill Druschel  
**Subject:** Chapter 78 Rulemaking William H. Druschel 24 Crestview Lane Eagles Mere Pa 17731

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. I support the inclusion of the language proposed by the Harvey Consulting report in the new Chapter 78 regulations.

As a homeowner who relies on well water for everyday living, I feel casing and cementing regulations are necessary to the public health, safety, and welfare.

A properly cased and cemented oil and gas well is critical to protecting fresh groundwater and public safety. Casing regulations should reflect state-of-the-art technology in the oil and gas industry.

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.

The regulations should be targeted at preventing gas migration into drinking water supplies.

Poor casing and cementing can cause contamination of fresh water aquifers. 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.

Section 208 of the Oil and Gas Act states that: "Any well operator who affects a public or private water supply by pollution or diminution shall restore or replace the affected supply with an alternate source of water in quantity or quality *for the purposes served by the supply.*" [emphasis added]

If a water supply has been affected by the well drilling operation, the proposed rules should require the operator to supply water meeting drinking quality standards.

It is unconscionable that a gas driller can supply someone with drinking water that does not meet drink water standards. Replacement water should meet drinking water standards at a minimum.

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

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.

The regulations should ensure the long-term integrity of the well.

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. I support these inspection requirements.

Predrilling surveys of water quality conducted by the drilling operator should be reported to the DEP and surface landowner.

Under the regulations (Section 78.52), operators must conduct a predrilling survey to show that pollution of a water supply existed prior to the drilling of a well. All test results should be disclosed to DEP and the landowners as soon as the operator receives them, regardless of whether the results show pollution or not.