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August 21, 2012

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ENVIRONMENTAL QUALITY BOARD

Environmental Quality Board  
16th Floor, Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101-2301

Dear Secretary Krancer,

I am writing to express my opposition to the proposed rulemaking recently adopted by the Environmental Quality Board amending Chapter 93 Triennial Review of Water Quality Standards. More specifically, the discharge limits included in this proposal for chlorides, molybdenum and sulfates will have considerable impacts upon our industries and small businesses.

In particular, our conventional oil and gas well operators will face debilitating effects if these standards become regulation. As you know, chloride is a component of conventional oil and gas production water. And, currently, this water is managed through approved discharges. However, these standards would essentially eliminate such disposal options; leaving operators with few alternatives but to stop oil and gas production.

Accordingly, any such reduction in output at these wells would inevitably lead to job loss in this and associated industries as our economy continues to struggle. And, as we are without related federal standards, the proposed increases would weaken our ability to compete with similar industries elsewhere. Finally, shuttering these conventional well operations would also exasperate our orphan well problem; leaving further environmental concerns and deepening the Commonwealth's burden to plug abandoned wells.

While I applaud the Environmental Quality Board's efforts in reducing pollutants to our environment, without other viable treatment and disposal options, it would therefore be irresponsible to increase limits for these NPDES-regulated discharges at this time. Consequently, proposed increases for chlorides, molybdenum and sulfates should be removed from the proposed Chapter 93 Triennial Review of Water Quality Standards.

Thank you for your consideration.

Sincerely,

Martin Causer  
State Representative  
67<sup>th</sup> Legislative District

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2012 SEP -5 PM 4:39

32 Valleybrook Drive  
Bradford, PA 16701  
August 19, 2012

Representative Martin Causer  
67<sup>th</sup> District, General Assembly  
78 Main Street, First Floor  
Bradford, PA 16701

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ENVIRONMENTAL QUALITY BOARD

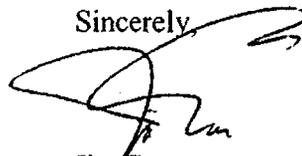
Dear Representative Causer,

I write in my capacity as a citizen and as a member of City Council for the City of Bradford, with a concern about a potential job loss related to the proposed discharge limits for chlorine, which is a byproduct of conventional oil and gas drilling activities. These activities, for over a century, have been vital to the economic health of northwestern Pennsylvania, impacting directly on producers and refineries, as well as all those industries that support them. Equally important, there are many jobs in non-oil/gas businesses and in the service sectors that exist as a result of a vibrant conventional oil and gas industry.

With the discharge limits for chlorine that are now being proposed by the Department of Environmental Protection Quality Board, local producers find it impossible to meet these standards. As a result, many producing wells will become unusable because their treatment and discharge systems will be unusable. This action will most likely result in the abandonment of a high number of conventional oil and gas wells, which will lead to the addition of many more abandoned wells to the already burdensome orphan well problem in Pennsylvania.

Because of the negative impact this proposed action by the DEP will have on the oil and gas industry directly, on the environment with the addition of abandoned wells, and on the already-tenuous job situation in northwestern Pennsylvania, I am opposed to the implementation of the chlorine discharge standard that is being proposed by the DEP.

Sincerely



Jim Evans