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House of Representatives

Commonwealth of Pennsylvania
Harrisburg

August 17, 2012

Honorable Michael L. Krancer, Chairman
Environmental Quality Board
16th Floor, Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101-2301

SCOTT E. HUTCHINSON, MEMBER
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Dear Chairman Krancer:

As you know, proposed rulemaking was adopted by the Environmental Quality Board to amend Chapter 93, regarding the Triennial Review of Water Quality Standards at our April 17, 2012 meeting. Having reservations about this proposed rulemaking at this meeting and again expressing my concerns in a letter dated July 10, 2012, I want to take this opportunity to reiterate my opposition on the inclusion of certain elements in the Triennial Review; discharge limits for chlorides in particular.

If approved, these changes will have considerable impacts on our important small, conventional oil and gas firms as well as a variety other industries and job-creators across the state. Chloride is a constituent of produced conventional oil and gas water and currently, most such water is disposed through National Pollutant Discharge Elimination System-regulated treatment operations.

Please understand that rigorous new restrictions on chloride concentrations, however, will eliminate many currently approved treatment facilities, thereby forcing operators to halt oil and gas production by removing water management options for their wells. This would naturally devastate the small businesses that rely on these wells for their livelihood. The likely result then is greater unemployment, more orphaned wells, and, without a corresponding Federal standard, a less competitive Pennsylvania.

Therefore, I remain opposed to the inclusion of chlorides, as well as molybdenum and sulfates in the proposed Triennial Review. I appreciate your time and attention to this matter. Should you need anything further from me regarding this issue, please do not hesitate to contact me.

Sincerely,

Scott E. Hutchinson
PA State Representative
64th District – Venango & Butler Counties

SECRETARY'S OFFICE

AUG 17 2012

DEPARTMENT OF
ENVIRONMENTAL PROTECTION