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The Pennsylvania Environmental Quality Board
Rachel Carson State Office Building
P.O. Box 8477

Harrisburg, PA 17101-2301

RE: **Amendment to 25 PA. Code, Chapter 93**

(Water Quality Standards)

Triennial Review

To Whom It May Concern:

At the April 17, 2012, meeting of the Pennsylvania Department of Environmental Protection Environmental Quality Board, the DEP presented proposed elements of the Triennial Review pertaining to the Chapter 93 Water Quality Standards. One element of the proposed changes includes discharge limits for Chloride. This specific aspect of the proposed changes will have significant impacts to many industrial operations in the Commonwealth, not the least of which will be conventional oil and gas operations.

Chloride is a major cation in the salt compounds commonly associated with produced conventional oil and gas water. For a variety of technical and geologic reasons, the primary method of disposal of produced water from conventional or shallow oil and gas wells in Pennsylvania is treatment and discharge to surface water under controlled conditions as provided in the Federal NPDES permit system that is administered by the PA DEP.

The imposition of a strict chloride discharge concentration will render many existing oil and gas treatment and discharge systems unusable and without viable produced water management alternatives many existing wells will become unusable. This action will likely result in the abandonment of thousands of conventional oil and gas wells which will lead to the addition of many more wells to the already burdensome orphan well problem in Pennsylvania. As orphan wells are already recognized as a serious environmental problem in Pennsylvania, the creation of a strict chloride discharge limit in the absence of viable oil and gas well water management options will exacerbate this problem and worsen the overall environmental quality of the State.

The whole thing is ludicrous in view of the fact that the amount of chlorides in the low-concentration produced water from shallow wells is infinitesimal compared to the tons of salt regularly dumped on the highways by PENNDOT and neighboring states.

For these reasons I oppose the implementation of a strict chloride discharge standard as currently proposed by the Department.

Sincerely,

Thomas A. Miller

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