

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Friday, March 14, 2014 3:55 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRIC;
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Cc: ra-epmsdevelopment@pa.gov
Subject: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

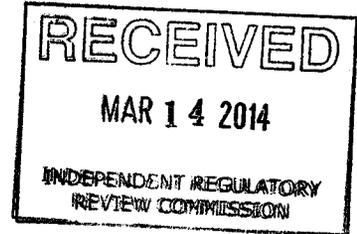


Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

The Environmental Quality Board (EQB) has received the following comments regarding the above-referenced proposed rulemaking.

Commentor Information:

Dan Frankel
 Pennsylvania House of Representatives (dfrankel@pahouse.net)
 2345 Murray Ave #205
 Pittsburgh, PA 15217 US



Comments entered:

Thank you for the opportunity to offer comments on proposed regulations for Act 13 of 2012, to the Pennsylvania Department of Environmental Protection's Environmental Quality Board on the proposed revisions to 25 Pa. Code Chapter 78 (Oil and Gas Wells).

While I support the updating of our drilling regulations, which currently don't adequately address the environmental dangers posed by unconventional natural gas drilling, I'm concerned that the new regulations don't provide sufficient protection for the state's environmental resources, including air and water.

One area of explicit concern to my constituents is the use of open air impoundments to hold hydraulic fluids until permanent disposal. My understanding is that the Department of Environmental Protection has already cited drillers more than 200 times for improper construction of wastewater impoundments. In the case of an improperly constructed liner failing, toxic chemicals may enter into our groundwater system, with negative health consequences far downstream from the original leak. An impacted water supply can have disastrous consequences for our communities, while restoring water quality can be difficult, and expensive. It is in the best interest of the Commonwealth that these leaks are prevented, rather than having DEP address leaks and contaminated water after an event occurs.

Pennsylvania's regulations (Sections 78.56, 78.57, 78.58, and 78.59) should reflect industry best practices, and require the storage of wastewater, flowback, and other contaminated fluids in closed loop systems. Using tanks to store fluids is a reasonable requirement for drillers, who

must eventually remove the fluids in containment tanks.

Thank you for your consideration of these comments.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

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