

Cooper, Kathy

3042

From: RegComments@pa.gov
Sent: Tuesday, January 07, 2014 8:39 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRRC; RegComments@pa.gov; eregop@pahousegop.com; environmentalcommittee@pahouse.net
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:

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 IRRRC
 2014 JAN -8 AM 9:23

Comments entered:

Streams and groundwater should be secure from pollution caused by oil and gas production operations. The definitions of "pit" and "freshwater impoundment" raise questions about that objective because they continue to incorporate the concept of "natural topographic depressions" within the definitions. We should not even suggest that Pennsylvania will allow fluids related to oil and gas operations to be managed in "natural depressions." All facilities used to hold fluids that may contain potential water pollutants should be specifically engineered for the task.

Proposed section 78.1 deletes the definition of "seasonal high groundwater table" even though that term is still used throughout the regulations, including in sections 78.56(a)(11), 78.59b(e). This definition should be maintained to ensure clarity and consistent enforcement.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
 Hayley Book

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