

3042

**Cooper, Kathy**

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**From:** RegComments@pa.gov  
**Sent:** Monday, January 13, 2014 8:53 AM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;  
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

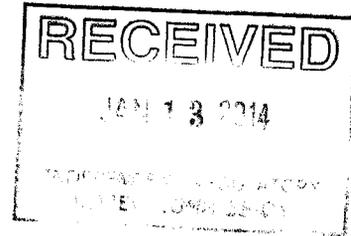


**Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites**

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

Commentor Information:

Harvey H. Stone  
BJS, LLC ([harvey@stoneconsulting.com](mailto:harvey@stoneconsulting.com))  
P.O. Box 306  
Warren, PA 16365 US



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Comments entered:

Board Members, attached are my comments regarding the proposed regulations for 25 Pa Code Chapter 78, Subchapter C

Harvey H. Stone, P.E

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These links provide access to the attachments provided as part of this comment. You are advised to save the attachments to your local computer or a network share when prompted by your browser.

Comments Attachment: [EQB letter from BJS.pdf](#)

Please contact me if you have any questions.

Sincerely,  
Hayley Book

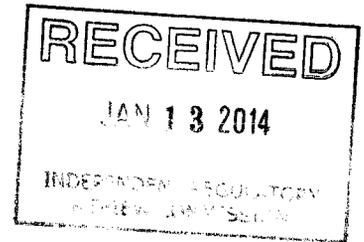
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Hayley Book  
Director, Office of Policy  
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3042

BJS, LLC  
P.O. Box 306  
Warren, PA 16365  
(814)726-9870



January 9, 2014

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105

Subject: Comments on Environmental Protection Performance Standards at Oil and Gas Well Sites 25 *Pa Code* Chapter 78, Subchapter C

Dear Board Members:

I lease land for oil and gas development; I hire drilling, fracking and other associated companies to drill our wells, pay engineers and operators to permit and operate them and I receive payments for production from conventional oil and gas wells.

Our average cost to drill a conventional well is \$67,000 and our annual operating costs are \$40,000 per year. We have drilled an average of two wells per year for the last three years and expect to drill 6 wells in 2014.

It has come to my attention that the Department of Environmental Protection (DEP) has proposed changes in regulations affecting the oil and gas business. **We are very concerned that there is not enough distinction made in the new regulations between conventional and non-conventional wells.**

I understand that these new and modified regulations will unnecessarily increase costs for oil and gas companies, and will be particularly costly for companies operating conventional oil and gas wells. While the regulations will significantly increase costs, the regulations will not result in significant environmental benefits in the conventional oil and gas industry.

The oil and gas industry is vital as an economic engine as well as a job supplier. As a well owner, I rely on the money I receive from the oil and gas development on my leases, especially during these difficult economic times. The increase in costs for the oil and gas industry directly affects my financial situation and will ultimately lessen my income. Ironically, under existing regulation the conventional oil and gas industry has had a minimal impact on our environmental resources. Why do the new regulations make such significant changes to the conventional oil and gas industry?

I strongly oppose these new regulations. In addition to causing severe economic harm to the oil and gas industry, they will have detrimental effects to the community as a

whole. More regulations, at a time when the economy is so unstable, is reckless and will only damage our economy further. And, all of these negative consequences will result from new regulations that will bring insignificant environmental benefits.

For these reasons it is important that these new regulations not be passed in their current form. Please vote "NO" to the current regulations until they are altered to account for the differences between shallow and deep well drilling.

Sincerely,  
BJS, LLC

A handwritten signature in black ink, appearing to read "Harvey H. Stone", with a long horizontal flourish extending to the right.

Harvey H. Stone  
Member