

Cooper, Kathy

3042

**From:** RegComments@pa.gov  
**Sent:** Thursday, January 23, 2014 9:29 AM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRIC;  
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:**

Dianne Arnold  
([diarnold@consolidated.net](mailto:diarnold@consolidated.net))  
Anonymous  
Valencia, PA 16059 US

2014 JAN 23 AM 9:59

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IRRC

**Comments entered:**

No text comments were provided as part of this comment submittal. Please refer to attachments below.

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: [Dianne Arnold.docx](#)

Please contact me if you have any questions.

Sincerely,  
Hayley Book

Hayley Book  
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IRPC

Comments to the Environmental Quality Board on Revision to the Oil and Gas

Regulations, Chapter 78

2011 MAY 23 AM 9:59

I would have preferred testifying in person, but the hearings within driving distance for me, Washington and Meadville, were all held at night. I am retired and have difficulty driving at night.

I live in Butler County, which has experienced a dramatic increase in drilling activity in the last 2 years. I would like to request that you consider holding more hearings, some in daylight hours and locate them in areas where drilling activity is occurring like Butler County. These areas are where the people are being most impacted and are more likely to have an interest in testifying. I am commenting on the areas I feel most concerned about.

Since I rely on well water, Section 78.51, is of great concern to me. A family whose water supply has been affected by drilling should receive water they can safely drink. Providing safe drinking water is the minimum that regulation should provide and should not be watered down by changes. Getting drilling companies to take responsibility for this has been a challenge. I know people who are on their third year without drinkable water, and the companies have been absolved of responsibility by DEP.

Section 78.52, Pre-drilling water testing is another concern I have. We need consistent baseline testing with comprehensive standards established by DEP. It

should not be up to the drilling company to decide. These standards should contain contaminants that often indicate that drilling is responsible for water contamination: dissolved methane, BTEX, barium, chloride, strontium, etc. This baseline testing is so critical if those of us on wells have water contamination after drilling begins.

Section 78.56 - One of the sources of water contamination is the open pits that hold flowback water. These open pits should be prohibited because inadequate or faulty liners can allow this toxic flowback water to seep underground. Heavy rains, such as those happening around the country, can cause these pits to overflow. Both of these situations have the potential to contaminate our aquifers.

I live in Southern Butler County, which was heavily drilled in the past. Many abandon wells exist in the area. Unplugged wells and abandon wells are a source of methane migration. A pre-fracking survey needs to occur to identify orphan or abandon wells prior to drilling on any site. The drilling company should be required to plug orphan or abandoned wells before drilling. Unfortunately, this occurred because of lax regulation and oversight in the past. Let's not continue to make the same mistakes.

Section 78.61 - Drill cuttings need to be tested for radioactivity. By its nature, unconventional gas drilling released naturally occurring radioactive material, which then comes to the surface in the drill cuttings. All drill cuttings should be tested for

radioactivity before being disposed of and should be properly disposed of in waste disposal sites that handle radioactive material. With the estimated amount of unconventional gas drilling to occur in PA, this could prove to be a big public health issue.

Respectfully submitted,

Dianne Arnold,

Valencia, PA 16059

January 22, 2014

3042  
**Cooper, Kathy**

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**From:** RegComments@pa.gov  
**Sent:** Thursday, January 23, 2014 9:26 AM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;  
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**Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites**

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Commentor Information:

Helen Podgainy Bitaxis  
(hpbitaxis@msn.com)  
Anonymous  
Anonymous, PA 00000 US

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IRRC  
2014 JAN 23 AM 9:59

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Comments entered:

Dear Sirs:

I am writing this in lieu of attending the meeting being held this evening in Washington, PA, which I am unable to attend. I just want to be sure that you realize that not all of those PA residents who are concerned (VERY) as to the potential effects from fracking on both people's health and on the environment, two not so separate matters, are able to attend one of the meetings scattered thru out the State and that we are concerned enough to be watching what you are doing -- doing hopefully for the benefit of we citizens and not only for the benefit of the corporations.

First I want to say that I have not over the past half dozen years or so been at all impressed that you are doing the job as it should be done. Let me qualify that statement with the fact that I am one of the pediatricians for the Hallowich family, (I would imagine that name is familiar to you). I learned of the many times they called upon you, i.e. the DEP, for help when their well water was poisoned, when they would have to leave their home when wells were being flared and the wind was blowing toward them, have to leave with tearing eyes, eyes, noses and throats burning, and when the area lost electricity during a fierce thunder storm and black clouds of smoke were billowing from the compressor plant behind their home. And I know the kind of help that was provided. The most I could say you did was to pay a visit to them and then go together to the perpetrator of the problem. But then you would always accept the poor excuses given, the promises to fix the "problem" and leave. There were no reprimands, no fines, and no checking back to see if the problem(s) had indeed been resolved. Also due to two of my fellow docs and

one of my office nurses living in South Fayette, and what I'd already seen that can occur with fracking, I attended a "town hall meeting" that was held there to discuss fracking in their area and more specifically fracking in/under some park land there. Speaking at the meeting were some gas company people, one of which was from the Marcellus Shale Coalition, the South Fayette county "commissioner" (I can't recall his title/job), a lawyer and last but not least, a gentleman from the DEP. I arrived at the meeting after it had already started, due to my work as well as my unfamiliarity with the area and difficulty in finding the meeting place. When I walked in there were many people in the audience, at least some of which were farmers whose land I'm sure the gas companies were interested in. In the back of the room were many copies of a paper proclaiming "GASLAND DE-BUNKED!" I missed one of the people speaking for the gas company as well as the Township Supervisor or Commissioner, or whatever his title. But I did not miss the DEP rep. (Oh, one little qualifying fact I didn't mention, is that this meeting was held on a Thursday evening. And on Tuesday of that same week, there had been a large headline article in the Pittsburgh Post-Gazette about how the DEP had placed the largest fine ever given to one of the gas companies fracking in the State, the fine given to Cabot Oil and Gas for contaminating the well water of a number of people in Dimock, PA.) Well, I then thought I was hearing things when YOUR rep got up to speak and started talking about how fracking for gas would be such a benefit to the region, and how all this talk about possible water contamination was just BS, "Why there has been no record of any water contaminated in the State of Pennsylvania, in fact none in the entire United States"! They weren't taking questions from the floor, but I was dying to raise my hand and say, "Excuse me. I arrived a little late, and I thought they had introduced you as being from the DEP. Which of the gas companies is it that you work for?"

Now as I stated, I am a medical doctor and not an environmental engineer or geologist. So I cannot give specific recommendations. But I can definitively state that you need to be doing a much better and tighter job on monitoring the companies doing the fracking, as well as the companies working with the separation, storage and transport of the methane, the by products and the waste. They wells should be a safe distance from homes, schools as well as hospitals, nursing homes, etc. OSHA should be called in to check on the safety of the workers. Wells should not be flared, letting methane and other substances escape into the atmosphere. I know there are ways to capture things, just probably alot more trouble and expense to do so. There should be checks before and during and even after fracking of any wells or aquifers or ponds within a specified distance as well as first mapping out that there are no likely easy paths to contaminate said water supplies due to structural aberrations of the ground, such as coal mines, etc., which could make it easier for contaminated fluids to shift about. The air quality should be monitered, as well. Track should be kept of any people living close to fracking sites who develop new illnesses, in particular dermatologic, pulmonary and neurologic, not contagious illnesses, and also malignancies, whether thought to be related or not. There should not be this practice of the gas companies paying off people, giving them money to move, etc., but in return demanding Non-disclosure contracts signed. If you've nothing to hide, why worry about what a few people say? I absolutely do not trust the majority of the gas companies, do not believe all their concerned words and promises. And I really can't say that I trust your department, due to the things I've seen and heard as I wrote above. I hope I'm wrong. I hope this new year will mark a turning point, and I will come to believe that our State government really does care about the people who elected them and not just the big corporations and the \$\$\$ they provide. I will be watching.

Sincerely,

Dr. Helen Podgainy Bitaxis

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Hayley Book

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Hayley Book  
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Commentor Information:

Paul Battista  
 (paul@sunnysidesupply.com)  
 28 Johnston Road  
 McDonald, PA 15078 US

RECEIVED  
 EQB  
 JAN 23 2014

Comments entered:

My comments are attached.

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: [DEP - EQB Cahpter 78 1-20-14.pdf](#)

Please contact me if you have any questions.

Sincerely,  
 Hayley Book

Hayley Book  
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3042

**PA DEP & EQB Chapter 78 Regulations Public Comments**

**Submitted via email 1-22-14**

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ERRC

2014 JUL 23 AM 9: 58

**Environmental Quality Board Opens Public Comment Period on  
Proposed Oil and Gas Regulations,**

I am not an air quality or environmental professional, but let me share with you who I am and my credentials in regards to the Oil & Gas Industry here in Pennsylvania.

I am a husband, father of 2, grandfather of 2 and a registered regular voter. I was born & raised in southwest Pennsylvania. I grew up on our family farm in Mt. Pleasant Twp. Washington County. Dad was a full time steel worker and put all his extra time into the farm & family. I hunt & fish in PA. For the last 33 years, my family & I have owned & operate a small supply company called SunnySide Supply, Inc. In 2008 we employed 5 people, by 2012 we have added 10 new employees. We now provide 15 employees (with plans of adding 3 more) all family sustaining incomes, due to the Shale Gas Industry. Here is a very interesting fact, from 2008 to 2012 our employee's average salary increased 60% because of the natural gas industry in PA. Let me be clearly transparent, I live, work & play in the Marcellus Shale Gas play of southwest Pennsylvania.

By the way, the name SunnySide came from the optimism my wife & I had 33 years ago to provide solar equipment to people for the SunnySide of your house. Business was fair, but when the Government Subsidies ran out so did the buyers of solar products! Sound familiar? So we changed our business focus to Industrial Safety Products and kept the name.

I believe solar & wind can generate electricity... however....is the solar & wind industry ready to meet the demand that we need as a nation today? Shale Gas can be the bridge fuel that will safely get us to that point.

With that said, let me share with you my views about the Shale Gas Industry here in southwest Pennsylvania.

I have heard people talking about different concerns, so let's break the issues down by topics of concerns. Then I'll share my firsthand view as someone living and working in the heart of the Marcellus Shale Play.

## **1. Environment**

- a. The industry has added layers of safeguards to protect the environment from spills, emissions and venting. I have seen firsthand how the industry has moved from using secondary containment under each machinery to lining the complete pad with multiple layers of continuous seamed liners.
- b. Regularly scheduled emissions testing on the gathering field compressors that have been upgraded with the addition of very expensive catalytic convertors and ultra-lean burn engines all to reduce emissions and meet your standards.
- c. Sound abatement at the compressor stations. In other states the industry does not even cover the compressors. In PA the compressors are enclosed in a steel building and the building is designed to reduce the noise levels to a legal limit.
- d. I have seen in the last 6 years an assertive effort to reduce stray vented gas by using improved seals and attention to proper maintained on pipe line connections along the gathering pipe lines, compressors stations and plants. Where there is venting due to safety blow downs, I see that gas being captured and run through state of the art incinerators that have been installed.

- e. Take a minute to read the attached article from the Wall Street Journal written by, Russell Gold, April 19, 2013  
**“Rise in U.S. Gas Production Fuels Unexpected Plunge in Emissions”**  
Below is a short excerpt of the article.

*“Energy-related emissions of carbon dioxide, the greenhouse gas that is widely believed to contribute to global warming, have fallen 12% between 2005 and 2012 and are at their lowest level since 1994, according to a recent estimate by the Energy Information Administration, the statistical arm of the U.S. Energy Department.”*

*“Few people predicted this drop in carbon emissions. “Everybody just figured that emissions were just going to continue to increase rapidly,” says Ted Nordhaus, chairman of the Breakthrough Institute, an energy and climate think tank based in Oakland, Calif. “Nobody was expecting the worst recession since the Great Depression, but also no one was really expecting this remarkable shift from coal to gas either.”*

- f. Also read the short article posted by John Hanger, Wednesday, April 3, 2013, **“Pennsylvania Leads Nation In Cutting Sulfur Dioxide Emissions by 600 Million Tons From 2007 to 2011”** I feel this article supports the need for the natural gas industry in Pennsylvania from an environmental stand point.
- g. I see firsthand how the industry is willing to make the necessary investments into equipment, processes and training to make the industry safe for its workers, the communities and the environment.

**h. In the fall of 2013, the State Review of Oil & Natural Gas Environmental Regulations (STRONGER), a national non-profit organization dedicated to assessing states' regulations and assisting in strengthening them, reported that safe shale development in the commonwealth is overseen by some of the nation's toughest regulations.**

**i. STRONGER has reviewed Pennsylvania in 1992, 1997, 2004, 2010, and 2013.**

**ii. STRONGER determined that the Department of Environmental Protection's (DEP) Oil and Gas program which is already in place, without consideration of the currently proposed revisions, is "well-managed, professional and meeting its program objectives."**

**iii. This follows a September 2010 STRONGER report that called Pennsylvania's hydraulic fracturing regulations among the nation's most stringent.**

**iv. I have studied STRONGER credentials and read your recent reviews, you should be proud of your work. Congratulations!**

## 2. Wildlife and Natural Resources

- a. I still live in the country next to the family farm. I see the pipe lines that come through and the effort that is taken to properly put the surface (at least the slope & vegetation) back to its original state. The priority of this work is to establish vegetation and stabilize the soil and prevent erosion. Interestingly, when the snow falls in the winter, guess where the deer come to graze? The pipe lines!
- b. I do not feel that the wildlife numbers are declining due to being displaced from their habitat from pipe line work. If anything I believe we see more wildlife (deer & turkey) in the last 6-8 years. I don't think the wildlife is any more displaced then when a housing plan, shopping mall, or 4 lane highway is constructed.
- c. Take a look at the PA Insurance carrier's auto / wildlife claims. Each year there are more and more claims. Is the deer population really shrinking?
  - i. "In fact, AAA Mid-Atlantic spokeswoman Jenny M. Robinson said Tuesday, deer crash claims increased 10.6 percent between 2010 and 2012. The Insurance Information Institute estimates about 1.6 million deer-vehicle crashes occur annually nationwide. In those crashes, about 200 motorists die, tens of thousands are injured and damage claims exceed \$3.6 billion." By George Mattar, Posted: Wednesday, October 9, 2013, Bucks County Courier Times
  - ii. "The chance of a Pennsylvania driver striking a deer is 1 in 76, a new State Farm study shows. That is the fifth-highest rate in the nation. "In each of the top five states, the rate of deer-related collisions per driver rose from a year ago. The insurance company uses its claims data and state licensed driver counts from the Federal Highway Administration to monitor collision chances. In 2011, the odds of striking a deer with your vehicle in Pennsylvania were 1 in 82, making the state fourth in the nation." By Joseph Kohut, Published: October 29, 2012, *The Times Tribune, Scranton PA*

- d. The process and equipment that is used to transport fresh & production frack water has changed dramatically. Again the industry has heard the concerns and put Best Practices in place to protect the environment by implementing new procedures and equipment to reduce the chance of a failure which will protect both land and water ways. The industry has also developed a process to recycle their production water reducing the amount of fresh water that they use.
- e. The industry has raised the bar for shale development further with practices designed specifically to lessen the impact on surface disturbance and provide strategies to improve habitat and landscapes
- f. Partnerships with the conservation groups are examples of our industry's willingness and commitment to voluntarily protect and preserve our natural resources.
- g. Significant investments have been made across the Commonwealth to provide needed habitat and restore lands and watersheds.

### **3. The Economy**

- a. In general terms, the Shale Gas Industry has provided opportunity to Pennsylvania that many other states in the union could only wish for. We are lucky to have the jobs both in the gas industry as well as construction, hospitality and support services. Our unemployment is below national averages.
- b. We now have opportunities for our young people to earn a family sustaining incomes without having to spend a life savings on a college education. And for those that do attend higher education, they have opportunities to find careers here in their home state of Pennsylvania.
- c. The Gas Industry has paid \$1.8 billion in taxes to Pennsylvania since 2008.

- d. Act 13 Impact revenues of \$406 million paid to local communities both impacted & not impacted (Philadelphia & Pittsburgh) by the industry. As the chair of our local Mt. Pleasant Twp. Municipality Authority, I like the idea that these funds are paid directly to the communities that have been impacted without going through Harrisburg. These funds are being used to improve our local environment with the construction of a community sewage system. This will provide safety & peace of mind to our citizen who own property and receive a royalty check as well as those who live in small mining villages with no financial connection to the industry.
- e. I can go on and on about how the Gas Industry has helped our economy, both locally & at the state level. But let me just restate my opening points about our family business. We were surviving as a business in 2007, the economy was bleak and we did not see any opportunities to grow our business. Since the Gas Industry has come to town we now see a future in our business. Sure there will be peaks and valleys with activity as the play develops, but that is a challenge any business person must evaluate. There are no guarantees in life, only opportunities!
- f. Lower natural gas prices are driving a manufacturing renewal across the region. Moreover, natural gas liquids are the building blocks for a variety of products, including plastics, tires, pharmaceuticals, and other. Consider the employment impact of a manufacturing renaissance in our state!
- g. I have heard people say that the gas industry can't leave, the shale is here in PA. Wrong! If you look at the number of shale plays that have become active in the last 4 years it is amazing. There are other places that have shale and the equipment and technology is mobile. The industry operates as a business, they have stockholders to answer to. If a play is not profitable they will find another place to drill. I suggest that the economic impact of your regulations, has to be considerate of the Oil & Gas Industry, to keep the economy strong here in Pennsylvania.

#### **4. Closing Remarks**

I hope you take a minute to read the articles that I have attached which supports scientific findings that say that Natural Gas has helped to improve our air quality. The industry is not perfect, however it is important to continue to embrace the industry which helps our environment, wildlife and economy. I urge you to not undermine our current strong, consistent regulatory framework. **Instead, I urge you** to continue to work in a cooperative manner with the Oil & Gas Industry to maintain a balance between strong environmental protections and a strong economically competitive Pennsylvania!

**Pennsylvania Shale Gas is Clean, Abundant, Affordable and  
Red White & Blue Energy!!!**

Respectfully submitted,

Paul Battista

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SunnySide Supply, Inc.  
1830 Route 18  
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Corporate Vice President,  
Manager of Business Development

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**April 19, 2013 | [@MarcellusGas](#)**

## **Rise in U.S. Gas Production Fuels Unexpected Plunge in Emissions**

The Wall Street Journal

By Russell Gold

U.S. carbon-dioxide emissions have fallen dramatically in recent years, in large part because the country is making more electricity with natural gas instead of coal.

Energy-related emissions of carbon dioxide, the greenhouse gas that is widely believed to contribute to global warming, have fallen 12% between 2005 and 2012 and are at their lowest level since 1994, according to a recent estimate by the Energy Information Administration, the statistical arm of the U.S. Energy Department.

While other factors, including a sluggish U.S. economy and increasing energy efficiency, have contributed to the decline in carbon emissions from factories, automobiles and power plants, many experts believe the switch from coal to natural gas for electricity generation has been the biggest factor. Carbon-dioxide emissions account for nearly 84% of greenhouse-gas emissions, while methane—the main ingredient in natural gas—makes up 8.8%, according to a recent Environmental Protection Agency report.

Natural gas emits half as much carbon dioxide as coal when used to make electricity, though the calculation fails to take into account the release of methane from natural-gas wells and pipelines, which also contributes to climate change.

Few people predicted this drop in carbon emissions. "Everybody just figured that emissions were just going to continue to increase rapidly," says Ted Nordhaus, chairman of the Breakthrough Institute, an energy and climate think tank based in Oakland, Calif. "Nobody was expecting the worst recession since the Great Depression, but also no one was really expecting this remarkable shift from coal to gas either."

Last year, 30% of power in the U.S. came from burning natural gas, up from 19% in 2005, driven by drilling technologies that have unlocked large and inexpensive new supplies of the fuel.

The U.S. trend hasn't led to a global decline in carbon emissions, which increased 15% from 2005 through 2011, according to federal statistics. An International Energy Agency report this week concluded that China's rising reliance on coal to fuel economic growth jeopardizes progress toward what the IEA calls "a low-carbon future." But the U.S., which has decreased its carbon-dioxide output tonnage more than any other nation, demonstrates that market forces can have an impact on greenhouse gases even as politicians continue to disagree over what, if any, federal regulations are needed to force industries to reduce their emissions.

White House spokesman Clark Stevens said important progress had been made reducing emissions and the federal government was committed to implementing standards that "help ensure that we remain on a path to reduce these emissions."

U.S. carbon-dioxide output rose steadily in the 1990s and 2000s, peaking in 2007. In 2008, the economy weakened and power generation from natural gas and renewables began to increase, a combination that led to a sharp reduction in emissions. The Energy Department, which had been expecting increasing emissions, began lowering its forecasts in 2009. It now says carbon-dioxide emissions will begin rising year-on-year in 2015 but won't return to 2005 levels through 2040.

These rapid U.S. declines may be short-lived, as natural-gas prices rise and utilities increase coal consumption. "Our coal-fired generation has certainly picked up" in recent months, says Nick Akins, chief executive of Ohio-based American Electric Power Co. AEP +0.91% Natural-gas prices have risen for eight straight weeks, recently closing at \$4.40 per million British thermal units, more than twice its price a year ago.

Mr. Akins also says that stronger economic growth in the U.S. would reverse some of the recent changes. "If the economy were to pick back up considerably before you are able to put new natural-gas capacity in place," he said, "you would expect carbon emissions to increase because coal is going to pick up as well."

As the U.S. has reduced its coal consumption, it has increased its coal exports to Europe, which rose 23% in 2012 from a year earlier, according to federal statistics. Gérard Mestrallet, chief executive of French power group GDF Suez SA, GSZ.FR +1.34% says that European utilities imported and burned that coal, raising carbon-dioxide emissions from power plants in Europe. He said as-yet unpublished figures for GDF will show an increase in emissions last year.

Other European utilities used more coal also, likely reversing a recent trend of carbon reductions. European carbon emissions fell 8% between 2005 and 2011, the latest year for which data are available. In February, the German environment ministry said it expected there was a 1.6% rise in greenhouse-gas emissions in Germany last year.

European officials have criticized both the U.S. and China at recent United Nations climate summits for a lack of political will to reduce greenhouse-gas emissions. The European Union instituted regulations requiring its member states to lower emissions. The EU has also reduced its overall greenhouse-gas emissions to meet requirements of the Kyoto Protocol, a U.N. compact adopted in 2005 which the U.S. hasn't signed. Late last year, the EU said its emissions have fallen 17.5% since 1990 and were "on track" to meet its 20% reduction target under the Kyoto agreement by 2020. Since 1990, U.S. greenhouse-gas emissions are up 8%. But since 2005, U.S. emissions have fallen faster than Europe's.

The rapid decline in U.S. emissions has taken some pressure off the White House after the 2010 failure of a cap-and-trade bill meant to put a price on carbon emissions. Instead, the Obama administration has embraced environmentally responsible production of natural gas as a relatively painless way to meet both energy and environmental goals.

The decline in U.S. emissions from 2005 to 2012—706 million metric tons of carbon dioxide—puts the U.S. a long way toward achieving the 17% reduction in greenhouse-gas emissions from 2005 the Obama administration set as its 2020 goal a few years ago.

Groups in favor of cutting greenhouse-gas emissions to reduce the threat posed by climate change say far deeper reductions than that 17% are needed. "The wildfires, storms and droughts we've seen over the past few years have shown us we need to make even steeper reductions in emissions that were proposed a few years ago," says Michael Brune, executive director of the Sierra Club.

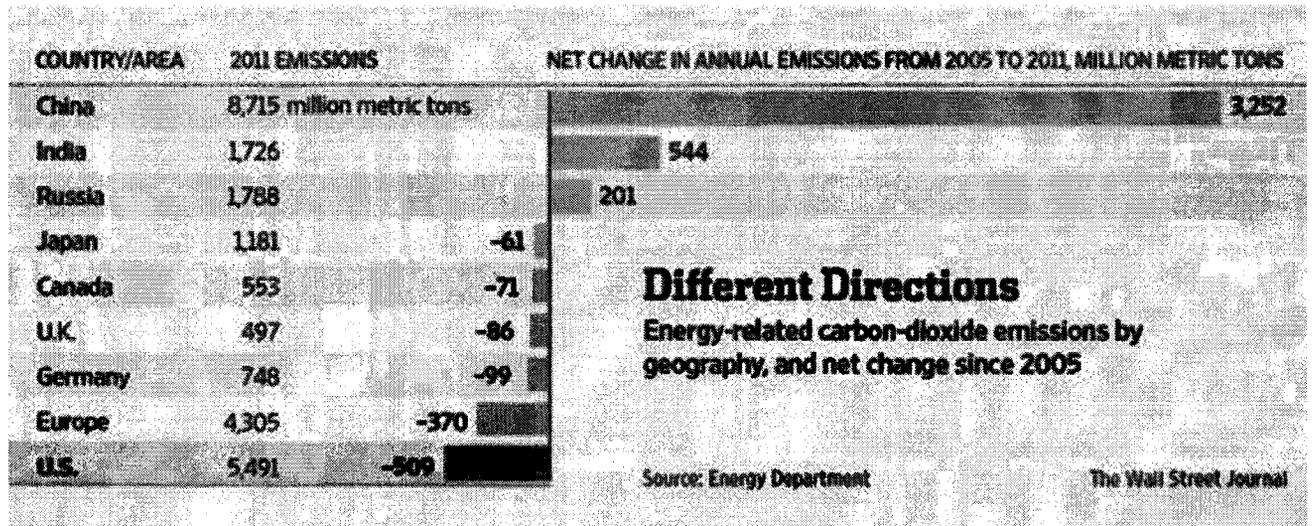
There is considerable worry by many observers of the gas industry that federal figures of overall greenhouse-gas-emissions reductions may be misleading because they fail to account for the impact of natural gas that leaks into the atmosphere from drilling and pipelines. A recent EPA report noted that U.S. greenhouse-gas emissions, including carbon dioxide, methane and other contributors, were 6.9% below 2005 levels, but this data didn't include 2012.

"The fundamental question is, are we making progress in reducing global warming—and that is a question of whether or not we are controlling methane leaks," says Mark Brownstein, head of the U.S. Climate and Energy Program at the Environmental Defense Fund, which is leading new studies to determine how much natural gas leaks from wells and pipelines.

"If you measure the extent of the problem, you can manage the problem," he says. "We just haven't been measuring and therefore we haven't been managing."

Some states require natural-gas companies use technology to capture gas during the construction and drilling of wells. While much of the energy industry has resisted such requirements as too expensive, some companies that use this technology report that it pays for itself. Houston-based Southwestern Energy Co., SWN -0.75% a large shale-well driller, said capturing gas is no more costly than burning it off, or flaring it.

Take a minute to really look at this chart. China is producing 3,252 Million Metric Tons of emissions while the USA has REDUCED its emission to -509 Million Metric Tons. The reduction is the result of using Natural Gas.



Wednesday, April 3, 2013

## Pennsylvania Leads Nation In Cutting Sulfur Dioxide Emissions by 600 Million Tons From 2007 to 2011

Unlike China, America's air is getting cleaner, and Pennsylvania is leading the way, where sulfur dioxide emissions were slashed by nearly 600 million tons from 2007 to 2011 or by about two-thirds. Georgia was second with a 400 million ton reduction. <http://www.eia.gov/electricity/monthly/update/>.

The Clean Air Act targets sulfur dioxide for reduction, because it is a precursor to particulate matter that causes sickness and early death and because it causes acid rain. The huge declines are nothing but good news.

The sharp declines in sulfur dioxide emissions are caused by large investments in scrubbers for coal-fired power plants, the shift to natural gas power plants, as they emit very little sulfur dioxide, and more renewable energy and energy efficiency.

Posted by John Hanger at 6:45 AM 

3042

Cooper, Kathy

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**Sent:** Wednesday, January 22, 2014 5:14 PM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC; RegComments@pa.gov; eregop@pahousegop.com; environmentalcommittee@pahouse.net  
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**Comments entered:**

The public comment period should be expanded to 120 days minimum and more hearings should be set in affected counties. This is an important and far-reaching rulemaking and more time is needed for people to participate in a meaningful way.

Also, I am asking that the new standards should include the following:

1. Pre-drill water testing and the restoration and replacement of contaminated water supplies (Sections 78.51 and 78.52). We learned through DEP's determination letters that natural gas drilling operations have impacted at least 161 water supplies statewide. The natural gas industry has fought to have water restored to only pre-contamination conditions—even if it is not safe to drink. In addition, DEP leaves it up to the driller to decide when, where, and how to conduct water quality tests before drilling starts. DEP should require:
  - Operators to restore contaminated drinking water to a quality that meets Safe Drinking Water Act standards, no matter what the quality of the water prior to drilling. If the quality of a water supply prior to drilling was above these standards, the operator must restore the water to that higher standard; otherwise, good water supplies will be degraded.
  - All drillers to use a consistent list of parameters for pre-drill water testing, which DEP must establish before the proposed regulatory changes are adopted. The parameters should be as comprehensive as possible, but at a minimum match what DEP uses when it conducts full contamination investigations and to ensure that complete baseline data is available.
  - All drillers make pre-drill data available to the public, while protecting individual homeowners' privacy, through an online platform, which DEP must establish before the proposed regulatory

changes are adopted.

**2. Standards for frack pits and impoundments (Sections 78.56, 78.57, 78.58, and 78.59).**

Mounting violations and the potential for water and air pollution have already led some companies to transition away from pits and standardize the use of closed loop systems which utilize tanks to store wastewater. DEP should:

Prohibit operators from using open pits for storage of regulated substances, including wastewater, drill cuttings, and substances (like gels and cement) that return to the surface after fracking. Many spills, leaks, and other problems involving pits have occurred statewide that contaminate water, soil and air. Waste should be stored only in closed systems.

Prohibit the onsite processing of shale drill cuttings, which often contain hazardous substances and radioactive materials and require thorough analysis and special handling.

Define "freshwater" that is used in oil & gas operations. Water leftover from fracking and contaminated fluids being recycled for fracking (such as from mining or sewage) is often mixed with clean water for additional operations. The lack of a clear definition allows operators to avoid regulations on the use and disposal of polluted substances.

**3. Disposal of brine, drill cuttings, and residual waste (Sections 78.60, 78.61, 78.62, and 78.63, and 78.70)** Operators currently escape the strict federal regulation of hazardous substances that other industries have to follow. Yet drilling and fracking generate large amounts of solid and liquid waste that can harm water supplies, air quality, land, health, and wildlife. Pennsylvania should apply U.S. Resource Recovery and Conservation Act standards to regulate all aspects of the storage, transport, and use of hazardous materials contained in pits, centralized impoundments, and tanks. In addition, DEP's proposed Chapter 78 changes don't address the risks posed by hazardous waste and do little to improve current regulations or ensure safe disposal. DEP should:

Prohibit the burial or land application of drill cuttings, which can contain polluting and radioactive substances. DEP proposes different conditions for disposal of drill cuttings from above and below the well casing, but neither makes the practice safe. Cuttings from deep underground may contain more pollutants, but chemical additives and contaminated fluids are also found in drill cuttings from shallower areas.

Prohibit the onsite burial of waste pits. Buried pits can leak and pollute groundwater over time, yet burial allows operators to walk away from any responsibility after completing operations.

Prohibit the use of brine for dust suppression, de-icing, and road stabilization. Stormwater runoff carries brine into nearby waterways and wetlands. Not allowing the use of brine from shale gas wells is a positive step, but brine from conventional wells can also push salinity loads far above any naturally occurring conditions.

Prohibit the land application of tophole water, pit water, fill, or dredged material. These substances can contain chemicals and sediments bound with pollutants that pose risks to water, air and soil.

**4. Identification of orphaned and abandoned gas and oil wells (Section 78.52(a)).** This is an important change and should be supported. About 200,000 abandoned wells exist statewide. As drilling spreads and intensifies, so does the chance of accidents, blowouts, and pollution from the intersection of new wells with old ones. DEP should expand these changes and require operators to:

Identify existing wells before site and well construction and drilling (not just fracking), so that the location of a new well can be changed if needed.

Plug and seal or otherwise appropriately address abandoned and orphaned wells according to state safety standards prior to well site construction. The state lacks funding to address the large number of old wells, so drillers should be responsible for preventing pollution of adjacent water wells and air pollution from accidents when they occur.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Hayley Book

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