

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Wednesday, January 22, 2014 5:46 PM
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:

Livingston Alexander
 University of Pittsburgh Bradford and Titusville (lalexand@pitt.edu)
 300 Campus Drive
 Bradford, PA 16701 US

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 IRRC
 JAN 23 11 5 14

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: [Environmental Quality Board.docx](#)

Please contact me if you have any questions.

Sincerely,
 Hayley Book

Hayley Book
 Director, Office of Policy
 PA Department of Environmental Protection
 Rachel Carson State Office Building
 P.O. Box 2063
 Harrisburg, PA 17105-2063

Office: 717-783-8727
Fax: 717-783-8926
RegComments@pa.gov

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2014 JAN 23 AM 9:14

January 20, 2014

Environmental Quality Board
Pennsylvania Department of Environmental Protection
P.O. Box 8477, Harrisburg, PA 17105-8477

Dear Members of the Environmental Quality Board:

As a resident of Bradford, PA (McKean County), I am writing to provide feedback regarding the proposed Chapter 78 regulations on the production of oil and gas in the Commonwealth. The rules are written to regulate production from both shallow (or conventional) wells and the newer shale-gas (unconventional) wells found across the state. The proposed rules outlined in Chapter 78 take a one-size-fits-all approach to DEP regulations that would result in regulatory burdens that are both expensive and unreasonable for conventional producers.

Examples of the new regulations that will have a negative and burdensome impact on conventional oil and gas production are production-water disposal, small quantities of oil discharges, installation of monitoring wells, soil removal, and design requirements for well pads and pits. The list is long, and when the new requirements are added to the recently enacted changes in casing and well-reporting requirements, the cost associated with complying to mandates more aligned with the shale-gas industry threatens the sustainability of current conventional oil and gas production.

New conventional well completions are down from more than 4,500 in 2007 to fewer than 1,000 this year. This decline has resulted in lower investment in our industry, fewer job opportunities and significant declines in revenues. These declines have impacted the overall economy at state and local levels, and have certainly had a negative impact on the generations of dedicated employees that have supported this industry for more than 150 years.

There are already appropriate and adequate regulations for conventional oil and gas wells that provide effective protection for the environment. As the leader of two institutions of higher education and community member in McKean County, I urge the Environmental Quality Board and the PA DEP to work with the industry to achieve a reasonable and common sense approach to protecting the Commonwealth's natural resources by maintaining the existing regulations in place for conventional oil and gas wells.

Sincerely,

Livingston Alexander
President