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

Re: Proposed rulemaking on 25 PA Code Ch. 78, Subpart C – Environmental Protection Performance Standards at Oil and Gas Well Sites

Dear Board Members:

I am writing in opposition to the Environmental Quality Board (EQB) adopting the revisions proposed by the Pennsylvania Department of Environmental Protection (PADEP) to 25 Pa Code Chapter 78 "Oil and Gas Wells." As the Production Manager for a conventional producer, myself, our company and its 26 Pennsylvania employees, have firsthand experience with the extraordinary efforts made by Pennsylvania's oil and gas industry to be good stewards to the environment and good neighbors to the communities where we live and work. Based upon those experiences and my 28 years of experience, I find the proposed revisions to lack sufficient justification, to have costs far in excess of any benefits and to provide very little in actual, real-world environmental protections. In fact, I believe the proposed rule will diminish the recent prosperity created by Pennsylvania's oil and gas industry and will cost our communities and employees revenue while increasing their social burdens. We urge you to stand with me by voting against finalization of this rulemaking in its current form.

Among my many concerns with this proposal, I would like to highlight several which pose a particular burden on our business.

- 1.) First and foremost, my main concern is that these revisions were written strictly for the unconventional industry as mentioned in the very first paragraph your own preamble. As a conventional producer with a smaller operating budget than many unconventional operators, I feel strongly that these revisions will directly impact all facets of our business. Escalating operating expenses will lead to reduced drilling, reduced investing, reduced production which in turn will affect royalty owners, landowners, employees and spin off businesses.
- 2.) 78.52a Abandoned and orphaned well identification.
This is a redundancy and has no relationship to public health, safety, and the environment. These are things that operators have already done and are doing as standard practice when surveyors are sent out to the proposed site. The only thing I can see that would change is, now PADEP would require the operator to identify, through several means, including a questionnaire to the surface owner. The added time in the field for surveying along with the added expense of searching for absent surface owners and all other related administration for this section would drive up the cost of each proposed well. * Only require the GPS shots of the orphaned wells.

3.) 78.59a Impoundment embankments.

My belief is that this section should only apply to unconventional well sites. In (4) of this section it states that the slopes should be no steeper than 3 horizontal to 1 vertical. This is impossible to achieve on a small conventional well site measuring 150'x150' total. The conventional operators, in the last 20 years have been trying to reduce the size of the well pads, which in turn have obviously reduced the drill/frac pit size on location. We've had a great deal of success drilling conventional wells on smaller pads, while pleasing everyone involved, including the PADEP, landowners as well as the investors and operators. A smaller pad means less money to build. Win, win for all parties. * This section would need rewritten to accommodate the conventional operator's needs.

4.) 78.59c. Centralized impoundments.

This section should only affect unconventional operators. I know of very few conventional operators that use one large, (2million gallon) central impoundment. Most of our work is done right on the conventional well pad, again about 150'x150'. It is not cost effective to build a large impoundment pit for smaller conventional well drilling. This relates back to my first point, which in an attempt to cover what the PADEP feels is "all the bases" they have overlooked the needs and work already done by the small conventional operators. *Remove this section for conventional operators.

5.) 78.67. Borrow pits.

This section does not pertain to conventional operators as well as it does not "provide increased protection of public health, safety and the environment. " Very rarely does a smaller conventional operator open a large borrow pit to use for roadways, well pads and such. The borrow pits on small conventional well sites typically become the drill/frac pit. Any rock quarried from these 60'x100' pits are used right on site as well as the roadway. This section really does not even pertain to the unconventional sites. I would think that almost 100% of the stone and rock for the pad and sites are quarried off site and trucked in. It also provides that the pit be reclaimed within 9 months after completion of drilling. Let me remind you, that current PADEP law requires the entire well site to be reclaimed 9 months after completion of drilling. We see simply more redundancy. *This section needs removed; it has absolutely no place in these revisions.

As you can clearly read in my letter, I am solid in my resolve that these revisions (as written) should be scrapped and rewritten to separate out the conventional operator from the unconventional. In closing, I urge the Environmental Quality Board to reject this rulemaking as proposed. Unless the proposal is substantially revised based on full consideration of the costs and benefits, it will cause harm to the prosperity of our communities, and will cause harm to the people who will lose their jobs. To the extent that portions of this rulemaking are mandated by state law, the EQB should insist that DEP propose revisions only to fulfill those obligations, with simple rules written in plain language.

Sincerely,

Drew Adamo
Production Manager
Texas Keystone Inc.