

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Friday, February 07, 2014 11:33 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:

Hugh Rich
Richgas, Inc (richgas@verizon.net)
725 Tionesta Ave
Kane, PA 16735 US

Comments entered:

Richgas, Inc.
725 Tionesta Ave
Kane, PA 16735

Environmental Quality Board
PO box 8477
Harrisburg, PA 17150-8477

Dear Board Members:

I am writing to express my concern about the proposed changes in regulations affecting the oil and gas business. Much of my business comes from the conventional oil and gas industry. The proposed regulations will result in increased costs for oil and gas companies. The conventional oil and gas companies will suffer significantly from these added costs. The profit margins in conventional oil and gas wells are low. The difficult economics are reflected in shrinking conventional oil and gas production; new conventional well completions have dropped from nearly 5000 wells six years ago to less than 1000 this past year. The conventional oil and gas industry is already in difficulty

My company name is Richgas, Inc., a propane marketer in Kane, McKean County, PA. Our predecessor company was Sloan & Zook Co. of Bradford, PA. Sloan & Zook was an oil and gas producer who started business in 1914 by building the liquids extraction plant in Kane which

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evolved into our Propane & Butane business.

I witnessed Sloan & Zook's care of drilling, producing and water flooding practices from the early 1940's until they sold their properties in 1948 and they were always conscientious producers. I'm aware of the old time lazy pumper who didn't care if he drained produced water down a hill and didn't clean up around a well head but I'm certain these practices stopped many years ago.

Shallow well producers have known for years how to operate their leases and have kept up with the ever changing DEP rules. Present day practices have evolved using common sense and care for a fragile environment. A very large segment of the oil & gas industry depends on this proper treatment of conventional practices.

The new unconventional wells area a totally different industry and should be regulated by a different set of rules. The cost of adhering to these rules represent only a tiny fraction of total expense of a well. Expecting a small producer with conventional wells to follow the same rules will lead to the abandonment of countless leases, a large segment of the industry becoming unemployed and a huge volume of recoverable oil still remaining in reservoirs.

A large number of old, marginal oil and gas leases have been abandoned in the last forty years. Many of these have been redrilled and returned to production using modern procedures. DEP, who governs this activity, has to be aware that the current regulations are adequate to protect the environment and still be affordable to the producer.

Furnishing propane to these drilling and producing operations, since the 1950's, has always been a welcome part of our business. To think that rigid regulations could jeopardize this is very hard to take, especially when it is not necessary.

Please vote "NO" to the current regulations until their harmful economic impact is properly analyzed and until the regulations are altered to support the economic well-being of the Commonwealth of Pennsylvania.

Sincerely,

Hugh Rich Jr

No attachments were included as part of this comment.

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

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Cooper, Kathy

From: RegComments@pa.gov
Sent: Friday, February 07, 2014 8:29 AM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC; RegComments@pa.gov; eregop@pahousegop.com; environmentalcommittee@pahouse.net
Cc: ra-epmsdevelopment@pa.gov
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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:

Paul Heckbert
(ph@cs.cmu.edu)
104 Washington St
Swissvale, PA 15218-1352 US

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Comments entered:

I favor a moratorium on all gas drilling in Pennsylvania, because the gas industry and the DEP have, in recent years, been reckless about conserving our clean air and water, and the risks to public health and the environment are high.

Short of a moratorium, the changes to gas drilling surface practices that I recommend:

Survey for all other nearby (within 1 mile of a planned well, say) wells (oil, gas, water, or other), map them, test their casing and cement for leaks, and put all well information on the web.

Forbid new drilling or fracking if there are any wells nearby with faulty casing or cement.

No surface impoundments, as open ponds could expose birds and land animals to toxic chemicals, and leaks through faulty liners, floods and overflows could pollute streams, soil, and aquifers for decades or centuries.

All tanks and pipelines should be designed and built to last at least 100 years.

No burial of fracking waste on-site. All fracking waste should be removed to another location and chemically neutralized before dumping. When transported it should be treated as a toxic chemical.

All wellheads and pipelines should be monitored closely with an array of sensors, with information summarizing current and past leaks summarized for the public (analogous to a weather report).

Wells in production should be tested yearly for integrity of casing and cement, and any that are leaking should be repaired, or sealed and abandoned.

DEP should do surprise inspections of every well once a month during drilling and fracking, then once a year while in production, and once every 5 years afterward. Generous rewards should be publicized and given out to motivate the public and private firms to find and geolocate all abandoned wells in the state.

As much as possible, gas, liquid, and solid leaks of any sort should be eliminated unless they are proven safe. E.g. release of N₂ or O₂ is fine, but release of CH₄ (methane) is not, as its potency as a greenhouse gas is 105 times that of CO₂.

The chemicals in use for any gas or oil operation (e.g. fracking fluids) should be detailed by chemical composition, health risks, quantity, and date, as drilling, fracking, and extraction operations proceed. This information should be easily accessible on the web.

Each well should inject an inert tracer chemical unique to that well into the well so that any leaks (gas, liquid, or solid) will have a fingerprint identifying which well it came from (analogous to dye tests used in residential stormwater testing). Methods for detecting and distinguishing these tracer chemicals should be shared publicly, of course.

Eliminate gag orders that ban landowners, workers, doctors, EMS, etc from discussing drilling operations, health effects, etc.

Create a public online zoomable map of all wells (plugged, abandoned, in production, being fracked, being drilled, and planned) showing depth, and all laterals, with information about underground strata, and a history of drilling, fracking, and extraction activities, with statistics about the production history, and ownership information.

Create a public online zoomable map of all pipelines and condensation stations, and related facilities.

Create a public online zoomable map showing all truck and barge routes used for the transport of fracking chemicals and fracking waste, and their daily traffic.

Why am I so concerned about environmental risks of gas drilling? Because Pennsylvania has great natural resources, which sadly got spoiled by extractive industries in the 19th and 20th centuries (timber, coal, and gas), and which have been making a slow comeback since about 1960. But more recently, that progress has been replaced by a reckless gold rush mentality facilitated by Corbett and the DEP as they have become too cozy with the fossil fuel industries. This shift of priorities from restoration and conservation to hasty extraction is causing Pennsylvania to again spoil our land, air, and water yet again. This endangers our future and makes Pennsylvania less attractive as a place to live. On top of that, we have the problem of global warming, and the folly of investing heavily in continued fossil fuel industries, particularly considering that gas extraction causes more overall global warming than coal extraction (see note above about methane potency).

I want to live a long, healthy life, and I want the same for my kids, and those goals appear to be at risk due to reckless pursuit of quick gas industry profits in recent years. By instituting strong

regulation of the industry, however, public safety and public trust can be secured.

Paul Heckbert
104 Washington St
Swissvale, PA 15218-1352
ph@cs.cmu.edu

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

Hayley Book
Director, Office of Policy
PA Department of Environmental Protection
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Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

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Commentor Information:

Alan Summerhill
 (zsummerhill@yahoo.com)
 Not provided
 Not provided, PA 00000 US

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 IRRRC
 2014 FEB -7 AM 0:15

Comments entered:

To whom it may concern ; The regulations you are considering will further hamstring the shallow gas industry , which has operated safely and has been responsible to environmental concerns . The shallow gas industry is Providing the fuel to dry the majority of the grain that is produced in Pennsylvania .

Agriculture is the number one economic force in Pennsylvania . It depends heavily on the shallow gas industry to provide energy for the production of many commodities.

The focus of new regulations should be limited to the deep gas industry . Their footprint on the environment is much larger and much of their technology is new . Close scrutiny is warranted . However , the industry that has served this state for over one hundred years , should not be further punished for the amusement of fear mongering environmentalists . The many decades of safe clean energy production should not be compromised .

Thank You for your time and consideration .

Sincerely ; Alan Summerhill [Armstrong County Farmer]

No attachments were included as part of this comment.

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
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Harrisburg, PA 17105-2063
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