

Cooper, Kathy

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From: RegComments@pa.gov
Sent: Monday, February 24, 2014 2:17 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

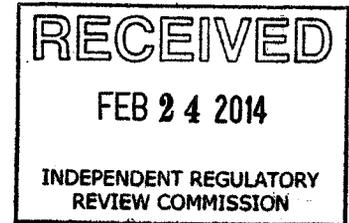


Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

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

Commentor Information:

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Comments entered:

On behalf of the Crawford County Oil & Gas Task Force's Economic Development Committee, these comments are being submitted concerning the proposed changes to Chapter 78. Crawford County is not a county experiencing the benefits of Marcellus Shale gas. However, there are several ancillary businesses such as Universal Well Services, Moody & Associates, Fluid Delivery Solutions, and Steptoe & Johnson PLLC, to name a few that are either headquartered or have a branch office located in our County that are heavily involved in the Shale play. Crawford County has several unconventional wells, has several permitted wells, and will see interest as it relates to the Utica Shale. However, the proposed changes to permitting, waste management, identification of abandoned wells, groundwater production and public health are not only unreasonable to smaller producers, these regulations will cause several of the 7,000 independent well drillers in Pennsylvania to go out of business. Pennsylvania is already recognized as having some of the strongest regulations on oil & gas development in the nation and our hydraulic fracturing regulations are among the most stringent in the United States. While many larger unconventional well drillers can absorb the cost of the proposed heightened regulations, these smaller producers cannot. As an example, expecting a smaller producer to restore a private water supply to better standards than existed prior to drilling and be administratively bogged down by filling out 23 separate notification requirements for the completion of a new well and 19 separate and new forms referenced in the regulation package are unfair, unrealistic, and merely not necessary. Simply put, one size cannot fit all when it comes to regulating oil and gas wells. Pennsylvania's tax and regulatory climate are already a major deterrent when it comes to business attraction. Therefore, we strongly encourage the DEP to amend the regulations to separate conventional

from unconventional operators. The benefits of more jobs, increased revenue, and cleaner air we have already experienced in Crawford County and Pennsylvania are all due in part to the increased use of natural gas. Going forward the benefits we will receive in lower manufacturing costs, power generation, heating costs and transportation are immeasurable. The Commonwealth cannot and must not miss this opportunity to become a leader in energy development while affording both large and small producers to be an integral part of this phenomenon moving forward.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

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