

From: RegComments@pa.gov
Sent: Monday, March 03, 2014 12:12 PM
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:

Arlene Mercurio
(songbird538@gmail.com)
538 Esther Ave
New Kensington, PA 15068 US



Comments entered:

EQB:

I'm writing to comment on the proposed Oil & Gas regulations currently under review, and thank you for extending the deadline for comments.

First I will make some general comments. My study of HVSWHF in Pennsylvania convinces me that the pace of oil & gas development far exceeds the necessary regulatory framework to protect the natural environment or public health. More resources need to be provided for on-site DEP inspections at all phases of the extraction process, including the related infrastructure. Better data management is sorely needed as are quicker, more professional responses to citizen complaints of contamination. Industry workers - including a gas company owner !!! - have told me that they consider the paying of fines to be part of 'the cost of doing business.' That tells me that the fines are so low and so infrequently imposed that they provide little incentive to follow the rules.

Specifically

DEP should:

Establish standards for pre-drill water testing.

Prohibit storage of wastewater in open pits.

Require the testing of drill cuttings for radioactivity.

Prohibit the burial of drill cuttings or wastewater pit liners.

Prohibit residual waste disposal on roads.

Require companies who have been found to have contaminated water supplies to replace the water to PA Drinking Water standards.

On-site inspections must be made part of the pre-fracking survey in order to investigate potential orphaned or abandoned wells rather than a paper review. Record keeping has been totally inadequate in locating these wells - most of which are undocumented.

Thank you

Arlene Mercurio
538 Esther Ave.
New Kensington, PA 15068
724-335-2980

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

Hoffman, Stephen F.

From: RegComments@pa.gov
Sent: Monday, March 03, 2014 12:11 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRRC;
RegComments@pa.gov; eregop@pahousegop.com;
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Subject: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

3042

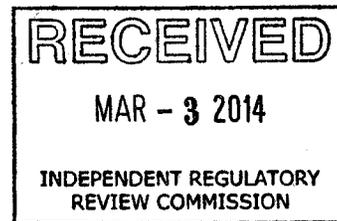


Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

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

Commentor Information:

Joseph T. Mercurio
(songbird538@gmail.com)
538 Esther Ave
New Kensington, PA 15068 US



Comments entered:

Environmental Quality Board:

I am a fisherman who worries that Pennsylvania's water resources are being depleted and contaminated by the Oil & Gas industry. I believe that DEP needs more resources to protect our natural resources, health and way of life. The rapidity with which shale gas is being extracted seems to be an industry strategy to out pace regulations and protections. We ask that you quickly create a stronger response in order that citizens don't feel exploited and powerless. I suggest that you look to Colorado which seems to be doing a better job of tightening up protections, while working cooperatively with the industry.

RE: the regulations under consideration

Pre-fracking surveys must include on-site inspections for abandoned wells. Paper research is inadequate. The inadequacy of bonding requirements will exacerbate these legacy costs far into the future.

Residual waste must NOT be disposed of on roadways.

No burial of waste pit liners nor drill cuttings.

Test drill cuttings for radioactivity.

No storage on site of drill cuttings nor of waste water in open pits.

Companies must be required to restore water to drinking water standards, if their operations contaminate water supplies. Fines must be increased and imposed more readily.

Pre-drill water testing standards must be set.

Sincerely,
Joseph T. Mercurio
538 Esther Ave.
New Kensington, PA 15068

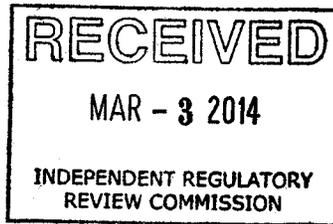
No attachments were included as part of this comment.

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Hayley Book

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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
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RegComments@pa.gov

Ed and Vickie Oles
220 Mosshaven Way
Ligonier, PA 15658



3042

vao2@comcast.net

February 28, 2014

RE: Proposed Environmental Protection Performance Standards at Oil and Gas Well Sites (25 Pa Code, Chapter 78)

We are deeply concerned about the impact on water supplies from drilling, the lack of safety from open pits and wastewater impoundments, and radioactivity from oil and gas operations. Regulations that protect water, health, and the environment may increase costs, but that is the REAL cost we **must** pay if we want the product. There is no free ride.

1. DEP must require pre-fracking on-site inspections and assessments to identify abandoned wells, in addition to the paper/map review, prior to drilling to eliminate potential pathways for fluid movement into groundwater.

2. DEP must stipulate that pre-drill testing be comprehensive and that the standards for pre-drill testing include dissolved methane, Barium, bromide, strontium, chloride, and BTEX. Water is our most precious resource. When we contaminate it, it is lost for decades. Results must be available to the owner and public.

It happens every time. When a resident is pictured and quoted in a newspaper story with a brown glass of water insisting they had not been having/using this kind of water prior to drilling, we have come to know the next line from the company, "There is no certainty that this is from drilling."

3. DEP must stipulate that water supplies be restored to PA Safe Drinking Water standards or higher if the water quality was higher prior to drilling - as established in ACT 13. In the interim, residents whose water supplies have been affected by drilling must receive water they can drink and use for household tasks, **safely**.

4. DEP must NOT allow the storage of wastewater in open pits or impoundments but require the use of closed loop systems based on tank storage, with a backup system to contain leaks, the current best practice standard.

5. DEP must require that drill cuttings be tested for radioactivity before selecting a disposal sight since Marcellus shale often has high levels of naturally occurring radioactive material. There must be no burial at the drilling sight of radioactive material.

6. DEP must require that disposal of brine, drill cuttings, and residual waste meet the standards of the US Resource Recovery and Conservation Act. Those standards must be applied to all aspects of the storage, transport, and use of hazardous materials. **The fracking industry must not be exempt from the regulation of hazardous substances that other industries must abide by.**

Hoffman, Stephen F.

3042

From: RegComments@pa.gov
Sent: Monday, March 03, 2014 11:44 AM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRRC;
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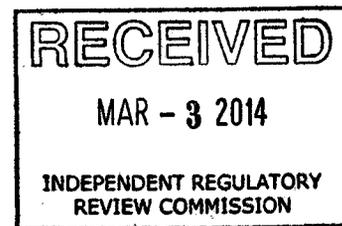


Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

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

Commentor Information:

Herb Gundy
(nhgccc1@windstream.net)
199 Pumpstation
New Alexandria, PA 15670 US



Comments entered:

After reading the proposed regulations I realize that there is no mention of a strategy for minimizing or eliminating methane leaking into the atmosphere from existing/operational wells. The sources are numerous; pipes, brine tanks etc.

Is this correct?

If so, why does this source of greenhouse gas continue to be unaddressed?

Thank You

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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Testimony of John T. Williams

3042

Environmental Quality Board Hearing

Warren, PA

February 12, 2014

My name is John T. Williams. I live at 3674 Geiger Hollow Rd., Allegany, NY. I am an Army veteran having served in the Vietnam War.

My family has been involved in the production of crude oil for four generations and I am very concerned about the over-regulation of shallow conventional oil wells. Although I live in New York State, I am still in the Pennsylvania oil field. I run a small trucking company by myself and I do oilfield hauling and work for oil and gas producers. If the local oil industry is destroyed by these regulations, I lose my livelihood.

I am also concerned as a royalty owner. As a land and minerals owner, I receive a royalty from oil production on my 250 acres. The royalty I receive helps to pay my property taxes and maintain my property as forestland. If oil production in the region is ended or significantly hurt because of draconian regulations, operation of the refineries will cease to be viable and I would lose my royalty because of the lack of an oil market.

I, along with my late brother, operated an oil producing operation for 40 years ending in 2000. We ceased operation because we could not contend with the ever increasing regulations. Because of this experience, I am very familiar with the tight economics of oil production in the Pennsylvania oil region.

I grew up in the oilfield and always enjoyed the unique culture and history of the oil patch. This is an industry that is over 150 years old and has affected thousands of lives directly, and many more indirectly in a positive way.

Please take all of this into consideration when you make your decisions.

Thank you,

John T. Williams
John T. Williams
jtwilliams64@yahoo.com

JOHN T. WILLIAMS TRUCKING, INC.
3674 Geiger Hollow Road
Allegany, NY 14706