



January 3, 2014

Pennsylvania Environmental Quality Board  
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**Subject: Proposed Changes to Chapter 78 Regulations**

Dear Board Members:

I direct the oil and gas services of our consulting firm, which has offices in Pennsylvania, West Virginia and Ohio, and provides services to the oil and gas industry in western Pennsylvania and the region. Not only do we provide high quality services to Pennsylvanian energy and financial firms, but we also provide our own employees in Pennsylvania with good paying jobs.

I have been made aware of the proposal now before your committee that would change regulations affecting both conventional and unconventional wells and strongly urge you to vote "NO" on those regulations.

Shallow oil and gas have been produced in western Pennsylvania for over 150 years without causing any lasting detrimental effect on the environment. Putting the small producers (largely family-run businesses) out of business by imposing costly, unnecessary new regulations on them would also jeopardize our business, the services we provide, the jobs we provide, and the local economy in the oil and gas producing region of Pennsylvania.

If you think it is necessary to impose new regulations on drillers and operators of deep, nonconventional wells, then please develop rules intended specifically for their types of wells. The large companies, such as XTO, Chevron, Talisman, Range, Cabot and EQT are drilling horizontal Marcellus Shale wells, which initially produce millions of cubic feet of gas per day, and can absorb the added cost. The small producers cannot absorb such costs. Their shallow oil wells produce only a fraction of a barrel of oil per day on average.

Let the shallow well producers continue to operate under the current regulations, which have done an effective job for nearly 30 years. **Please vote "NO" to the proposed changes to Chapter 78 regulations so the small producers can remain in business, support their families, and support their local economies.** This is especially important in counties outside of the main development area of the Marcellus Shale, counties such as McKean, Potter, Warren, Venango, Forest and Clarion. In our case, we would like to continue to expand our support services and provide more jobs

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in Pennsylvania. I encourage you to do the right thing.

Sincerely,

A handwritten signature in black ink, which appears to read "Michael J. Miller". The signature is fluid and cursive, with the first and last names being clearly legible.

Michael J. Miller, P.E.  
Senior Vice President  
Cardno MM&A