

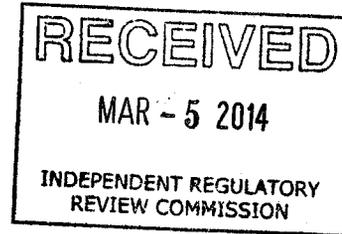
From: Shirley, Jessica <jessshirley@pa.gov>
Sent: Wednesday, March 05, 2014 1:21 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRRC; EP, RegComments; eregop@pahousegop.com; environmentalcommittee@pahouse.net
Cc: EP, MS Development
Subject: Proposed Rulemaking - Chapter 78 Form Letter #2(c)
Attachments: Form Letter #2c.pdf

1-2

Good Afternoon,

Attached is a form letter DEP has received regarding the Proposed Chapter 78 Environmental Protection and Performance Standards at Oil and Gas Well Sites. We have labeled this one "Form Letter #2(c)". It is slightly different than Form Letter #2(a) and Form Letter #2(b). To date, we have received 2 copies of this letter.

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February 18, 2014

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

3042



Dear Board Members:

I am writing to ask that the proposed revisions to PADEP's oil and gas rules not be finalized in their current form. My job in the conventional oil and gas sector relies on Pennsylvania having a healthy, robust oil and gas industry, and I am concerned that the added burden of increased regulation and associated costs of as much as \$100 million per year could significantly harm the industry while providing little or no added benefit to the environment.

Shallow oil and gas have been produced in our area of western Pennsylvania for over 150 years without lasting detrimental environmental effects. Through my job, I see that Pennsylvania's environment is in good hands with the oil and gas industry. Those within my company and others I encounter in our industry live, work and play in the same areas where the oil and gas industry operates, and we all share a passion for protecting the Commonwealth's natural resources. We want to pass on the legacy of a clean, healthy environment to our children and grandchildren.

I understand that regulations are necessary and must be updated periodically to match current laws and industry best practices. At the same time, however, the costs of regulations cannot outweigh their benefits. The driving force behind these new regulations has been the arrival of large scale unconventional drilling in the Marcellus, Utica, and other unconventional reservoirs. To that point, adequate distinction between conventional and unconventional operations is not reflected in the proposed regulations. Just like codes and regulations applicable to building residential homes differs greatly from codes and regulations for commercial building construction, proper and equitable distinction must be made when regulating the two very different conventional and unconventional oil and gas operations. When applied to conventional operators, many parts of these proposed rules go beyond what is called for under existing laws and impose requirements that go further than what is needed to effectively protect our environment.

I am concerned that the result will be fewer oil and gas wells drilled, which will mean fewer jobs in our industry and in the communities that support it, at a time when we desperately need more jobs. It will also mean less tax revenue for all levels of government, placing even greater burdens on already-stressed government services. Fewer oil and gas wells will also mean less oil and gas supply which will once again increase our dependence on other countries for our energy needs.

Please vote "no" to adopting this rule unless it is substantially revised to reflect full consideration of the costs and benefits of the regulation. Show us that the wellbeing of our people, the prosperity of our communities, and our energy future are every bit as important as Pennsylvania's natural resources.

Sincerely,


Signature

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