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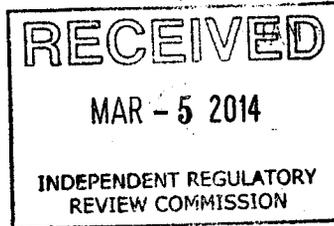
LHS Production, LLC

LHS Production, LLC  
231 Brinker Road  
Butler, PA 16002

Environmental Quality Board  
PO Box 8477  
Harrisburg, PA 17105-8477

December 18, 2013

Dear Board:



As a very small family run conventional oil and natural gas producer in Pennsylvania, we are asking that you keep the regulations separate from non-conventional wells. The differences between the two types of wells are night and day.

Our depths are nowhere as deep as non-conventional wells. The amount of water we have is a drop in comparison to Marcellus return water. Our shallow production water is lower in specific gravity and has less concentration of heavy metals in comparison to Marcellus return water making it easier to treat and having less of an environmental impact as opposed to Marcellus.

A blanket approach to oil and gas regulations will hurt conventional drilling. Ask any of the suppliers to conventional drillers, they will tell you how Marcellus has already hurt them. If we make it harder to drill conventional we will lose suppliers, conventional drillers, and conventional oil and gas producers. Our pockets are limited in comparison to the large companies that have very little connection to Pennsylvania.

Do not forget that we are the birth place of oil and natural gas. For 150 years we have drilled conventional wells safely. If a blanket approach of regulations goes into effect the conventional producers started by Edwin Drake will come to an end. In comparison, does the state put blanket regulations on small motor vehicles as they do for large?

Sincerely,

Dean Spahn  
3<sup>rd</sup> Generation

Keith Spahn  
3<sup>rd</sup> Generation

Derek Spahn  
4<sup>th</sup> Generation



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### Summary of Comments

- I. A very small family run conventional oil and natural gas producer in Pennsylvania
  - a. asking that you keep the regulations separate from non-conventional wells
  - b. depths are nowhere as deep as non-conventional wells
  - c. amount of water we have is a drop in comparison to Marcellus return water
    - i. shallow production water is lower in specific gravity and has less concentration of heavy metals in comparison to Marcellus return water making it easier to treat and having less of an environmental impact as opposed to Marcellus.
  - d. blanket approach to oil and gas regulations will hurt conventional drilling
    - i. suppliers to conventional drillers, they will tell you how Marcellus has already hurt them
    - ii. If you make it harder to drill conventional we will lose suppliers, conventional drillers, and conventional oil and gas producers
    - iii. pockets are limited in comparison to large companies that have very little connection to Pennsylvania
  - e. do not forget that we are the birth place of oil and natural gas
    - i. 150 years we have drilled conventional wells safely
    - ii. if a blanket approach of regulations goes into effect conventional producers started by Edwin Drake will come to an end