

PENNSYLVANIA MUNICIPAL AUTHORITIES ASSOCIATION

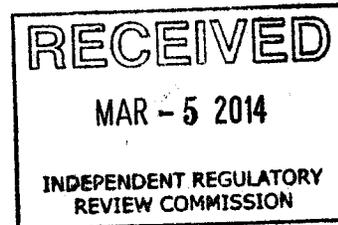
1000 North Front Street, Suite 401 Wormleysburg, PA 17043

717-737-7655 • 717-737-8431(Fax)

www.municipalauthorities.org • info@municipalauthorities.org

March 4, 2014

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



Re: Proposed Changes to Chapter 78 Regulations

Dear Members of the Environmental Quality Board:

The Pennsylvania Municipal Authorities Association (PMAA) supports the changes proposed to Chapter 78 regulations dealing with issues related to Marcellus Shale gas extraction activities.

PMAA represents over 700 authorities statewide, with nearly half of them providing drinking water service to several million Pennsylvania citizens. A critical concern of these water authorities is that both surface water and groundwater sources for public water supplies be protected from any impacts to water quality and water quantity due to Marcellus Shale drilling activities.

At the annual PMAA conference held in August, 2013 two resolutions were unanimously adopted by our members for the third consecutive year to encourage protection of our water resources from adverse gas drilling events:

Resolution 11-2013: *RESOLVED, that PMAA support the protection of the environment, public health, and the water resources of the Commonwealth as a top priority for state and federal regulators overseeing Marcellus Shale natural gas extraction.*

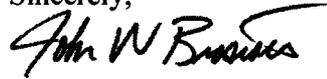
Resolution 12-2013: *that PMAA support legislation that requires public notification to drinking water authorities of Marcellus Shale gas drilling activities within or adjacent to their watersheds.*

PMAA Resolution 12-2013 addresses a particular water supply notification issue that would reach beyond the 1,000 feet requirement found in the regulations. It calls for notification to a water provider if drilling activities are **within or adjacent to a public water supply watershed**. The regulation currently dictates notification from an unconventional well “*within 1,000 feet of a water well, surface water intake, reservoir, or other water supply extraction point.*” Many of our members feel that drilling notification should extend to any public water supply watershed and also to any established Source Water Protection Zones that are within a proximity of 2500 feet to drilling activities. This would help to provide a greater water information base for the drilling industry while alerting local water agencies to drilling activity in the vicinity. Language to this effect could be placed in *Section 78.15(f)(vi)* in the currently proposed revisions of Chapter 78.

Additionally, we would ask for a longer comment period for public water suppliers under *Section 78.15 (2)*. In that section the *public resource agency* has 15 days to provide comments to the Department. We feel this should be extended to at least 30 days.

Thank you for the opportunity to comment on the proposed regulatory changes. Please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Brosious". The signature is fluid and cursive, with a prominent initial "J" and "B".

John W. Brosious

Deputy Director, PMAA