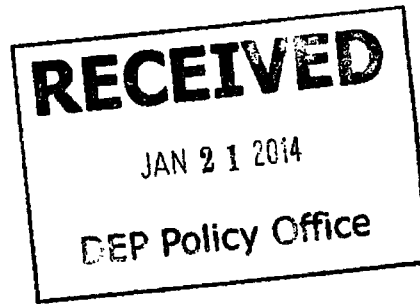


3042

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



500 South Ave.
Bradford, PA 16701
Jan. 19, 2014

Dear Board Members:

I am writing to you regarding the new and modified regulations proposed by the Dept. of Environmental Protection, particularly the ones outlined in Chapter 78. I am writing to you from 2 points of view. The first is that of a person who receives royalties for the production from conventional oil wells. I am 63 years old and will soon be retired. I had planned on receiving these royalties in the future to give me income besides my social security. However in the area where I live, Bradford, in McKean County, I personally know producers who will be unable to continue in business if the new regulations go into effect. I am not alone in this situation. Bradford has been an oil producing community during my whole lifetime. I have seen the industry rise and fall over the years but I feel these new regulations present the most serious threat to the oil industry in my lifetime. I fear that the industry that has supported our area during all these years will be gone. Considering the economic times I worry that the town's economic base will disappear. This is a serious matter and I urge you to consider it when making your decision.

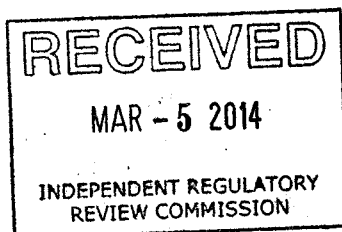
The second viewpoint that I am writing from is that of Bradford Township Supervisor in McKean County. I am now serving my second 6 year term in that position. I assume that you realize the financial condition of small townships such as ours is stretched to the limit now with state mandates, pension contributions, and infrastructure needs. Oil production and related industries such as our local refinery contribute a great deal to our income. Earned income tax, property taxes and local services taxes are just a few that we use to provide Township services to our residents.

What I hope to convey in this letter is the serious impact your decisions will have on much more than just the oil and gas drilling business. Your decision will have a ripple effect all the way to the wellbeing and economic future of the Commonwealth of Pennsylvania. I urge you to vote no to these regulations.

Sincerely

A handwritten signature in cursive script that reads "Gayle E. Bauer".

Gayle E. Bauer



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MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

DEPARTMENT OF ENVIRONMENTAL PROTECTION
JAN 11 2014
HARRISBURG, PA

Date:

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

Dear Board Members:

I am a concerned citizen, not directly affiliated with the oil or gas industry, and am writing to voice my **opposition** to the proposed changes to the Chapter 78 regulations currently being considered by your board.

Shallow oil and gas wells have operated in my area for over 150 years and their footprint on the environment has been minimal. As I understand the proposed regulatory changes, they would be very detrimental and too costly for the operators of shallow wells to comply with.

If we lose our local oil and gas producers, it would cause an increase in unemployment, loss of production vital to our local refinery, and take millions of dollars out of our already suffering local economy.

Please vote "NO" on the proposed changes to regulations, as they apply to conventional oil and gas wells. Allow the shallow wells to operate under the regulations in place before passage of Act 13 of 2012 and instruct the DEP to apply changes to nonconventional, deep wells **ONLY**.

Sincerely,

Robert D. Longrecker
Bradford, PA

The passage of new regulations as they apply to conventional oil and gas wells will likely create another impediment for the small independent producer. This one size fits all approach to regulation will further

hurt the fragile local economy by
hampering production, driving up costs,
and increasing unemployment. Our nation
has a chance to become energy
independent and the implementation
of new regulations will create
another bureaucratic barrier in
preventing our nation from realizing
that independence.

Robert D. Longnecker
69 Gregory Ave.
Bradford, PA 16701

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

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. I am a property owner who earns royalty revenue from conventional oil and gas activity on my land, and I am concerned that the added burden of increased regulation and associated costs could significantly harm the industry while providing little or no added benefit to the environment.

From what I see, Pennsylvania's environment is in good hands with the oil and gas industry. Those who work on my property and others I encounter in this industry live, work and play in the same areas where the oil and gas industry operates, and they all share a passion for protecting the Commonwealth's natural resources. It is obvious that they - like me - 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. It is obvious to me that the onset of Marcellus shale drilling has sparked these proposed changes, so why not concentrate on regulating that portion of the industry and leave the conventional industry as it currently is? 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 could mean smaller royalty payments for me and my neighbors. For many of us, royalty revenue has breathed new life into family farms and small businesses all across Pennsylvania. Decreased oil and gas activity will also mean fewer jobs in the 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.

I now support 4-5 environmental rescue groups

Family well has operated for 4 generations w/ no harm noticed by neighbors. You must avoid PENALIZING groups in a knee jerk reaction!

Sincerely, (We have supported anti-fracking. If you wish our support in PA let me know)

Dawn P. Ramage
Signature

P.O. Box 193
Street Address

STILL RIVER, MA P.O. BOX 193
City, State & Zip Code

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MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION



OCEAN CONSERVANCY

Ms. Dawn P. Ramage
PO Box 193
Still River MA 01467-0193

Cooper, Kathy

From: RegComments@pa.gov
Sent: Wednesday, March 05, 2014 9:38 AM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRRC;
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

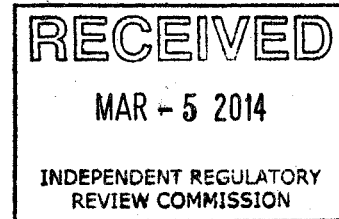


Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

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

Commentor Information:

Pat Pieto-Dooley
(dooleyjb@hotmail.com)
Not Provided
Not Provided, PA 00000 US



Comments entered:

Dear Board Members,

I applaud your decision to update Chapter 78 of the PA Code issued under the Oil and Gas Act, but urge you to strengthen some of these critical protections. Now is the time to make serious changes to these policies:

prohibit the use of open-air frack pits/impoundments, and require a closed-loop system that utilizes above ground tanks for storage of wastewater;

mandate standardized baseline testing and make that information available to the public;

require drilling companies to remediate contaminated water supplies to Safe Drinking Water Act standards;

Compel companies to identify existing wells before new well construction in order to prevent negative impacts on water supplies and the environment;

make companies plug and seal (or otherwise appropriately address) abandoned and orphaned wells according to state safety standards prior to new well site construction.

I appreciate your consideration of these rule changes, and your dedicated efforts to keep my family and all Pennsylvanians safe and healthy.

Sincerely, Pat Pieto-Dooley

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

March 5, 2014

Jeffrey P. Walentosky
5001 Julia Lane
McKees Rocks, PA 15136



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

RE: Comments to Proposed Regulation 25 PA Code Chapter 78

Environmental Quality Board Members:

Please accept this comment letter regarding the proposed rulemaking of Chapter 78, Subpart C – Environmental Protection Performance Standards. I am a lifelong resident of the Commonwealth and western Pennsylvania. I've been employed as a licensed professional geologist for over 23 years for a groundwater and environmental consulting firm located in western Pennsylvania, which acts as an unbiased third party consultant to industry representatives.

Our company maintains membership with the Marcellus Shale Coalition (MSC) and the Pennsylvania Independent Oil and Gas Association (PIOGA). As a member of PIOGA, I currently serve as the Well Construction Subcommittee Chair, which is part of the Environmental Committee. As part of my chairperson responsibilities, I had the privilege of attending and participating in the Oil and Gas Technical Advisory Board (TAB) workgroup public hearings on the proposed Chapter 78 revisions this past summer on behalf of PIOGA.

The Marcellus and Utica shales, along with other unconventional gas plays offer a tremendous opportunity to strengthen the economy of Pennsylvania and the United States. By developing a "clean" fossil fuel coming from conventional and unconventional sources, Pennsylvania can

compete again as an industrial manufacturing power. Employment through directly related and indirectly related industry is very significant and has allowed Pennsylvania to fare much better than most states during the recent economic recession. However, overregulation of this industry has the potential to steer industry outside of Pennsylvania to similar oil/gas plays that has reasonable, yet environmentally friendly standards.

I would like to commend the Pennsylvania Department of Environmental Protection (PA DEP) and the industry representatives for all of the hard work and long hours expended to get these draft proposed regulations to this point. However, it is apparent that there are significant improvements and modifications that need to be made to various portions of the proposed rulemaking. Here are a few of my comments:

General Comments

There is a significant difference between the conventional and unconventional well drilling and stimulation operations. The land disturbance footprint, waste management activities and water usage on conventional well sites is significantly different (much less) and entails a small percentage of activity in comparison to unconventional operations. Industry representatives met with PA DEP officials on numerous occasions to discuss the fundamental differences in these operations and the impact the proposed regulations would have on the conventional oil/gas operator, yet the Department has not adequately addressed this issue.

The proposed Chapter 78 revisions pose a significant financial impact to conventional and unconventional well operators without a justified environmental benefit. The review of the initial cost benefit analysis regarding these draft revisions indicates that the cost calculations are very much understated and would create far reaching impacts, especially to the traditional, small conventional operator with limited available staff.

During the TAB workgroup meetings in 2013, there were four issues of concern that were discussed – public resource protection, protection of water supplies, abandoned and orphaned well identification and waste management on well sites. Although there were significant

discussions between the work groups, there were no meaningful changes made to the draft regulations as a result of those meetings. In addition, there was no follow up meeting between PA DEP and the TAB in order to discuss any conclusions and recommendations developed from the work group meetings.

Specific Comments

- Application requirements (78.15) – PA DEP’s proposed revisions to Section 78.15 would create an expanded, confusing and unnecessary administrative determination process for its consideration of well permit conditions to protect public resources. At the same time, this would impose new legal obligations, applicable throughout the Commonwealth, on well operators to take actions to protect habitats of hundreds of what the PA DEP terms “special concern species,” which species are neither threatened nor endangered. These unjustified obligations to the operators could potentially have very significant economic impacts with no environmental benefit.
- Protection of water supplies (78.51) – as a professional geologist, I have conducted hundreds of investigations relating to the development and use of residential, industrial and community water supplies within the Commonwealth of Pennsylvania. This state is one of the few in the United States that has no drilling and construction standards for new and existing residential water supplies. Past proposed legislation in Pennsylvania has not been successful in affording the residents of the Commonwealth assurance that proper practices and guidelines are followed to minimize the risk of drinking water contaminants. Without this legislation in place, it is unreasonable for the Department to expect industry to be obligated to restore water supplies back to applicable safe drinking water standards if the supply did not previously meet these standards or possibly an improved water quality. The proposed restoration standards should be made to meet “pre-drilling” or “baseline” water quality.
- Abandoned and orphaned well identification (78.52a) - the identification procedure in this section of the proposed regulation outlines a very difficult process. It is my opinion

that the proposed distances from the wellhead and horizontal laterals are too stringent. I would recommend that the distances are considered from the standpoint of scientific reasoning, where the scale of well stimulation activities is very different between conventional and unconventional operations. In addition, a vertical component of zones to be produced by future wells and anticipated zones tapped by orphan and abandoned wells should be part of the consideration. Traditionally, the operator has completed its "due-diligence" in order to avoid potential environmental impacts and communication with abandoned wells. The introduction of a map finder identification tool will be helpful to the operators, as long as the system is without flaws, which is very unlikely. However, the use of a questionnaire with adjacent property owners will likely cause some issues from the standpoint of property access or lack of accurate knowledge regarding the existence of abandoned wells.

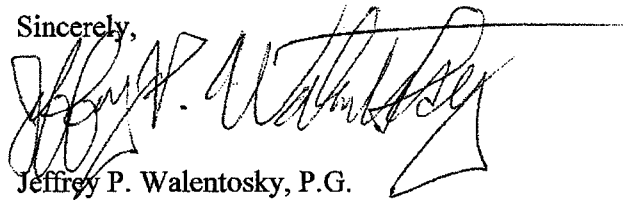
- Planning and emergency response (78.55) - operators should not be required to submit PPC plans to the PFBC or landowners. These are public documents that are available through the PA DEP Central Files Office. This is simply an administrative task that adds an unnecessary and unneeded burden to the operators.
- Reporting and remediating releases (78.66) – even though the Oil and Gas Spill Policy was established in 2013, there are still significant consistency issues. In addition, this section is very restrictive and does not focus on spill prevention and remediation. Some common oil/gas related contaminants do not have established standards that need to be met to ensure proper measures have been taken in accordance with the professional opinion of Department representatives. Without additional clear guidance and standards to follow, this section of the proposed regulations can create inconsistencies between regional office and unclear expectations of what remedial obligations an operator will have following an unexpected release, resulting often in a lengthy legal debate and an unresolved site remediation issue.
- Borrow pits (78.67) - Borrow pits need to remain active for the life of a project area, not just a single well pad. This appears to be another case where the regulations were drafted

for unconventional wells and then applied to conventional wells without due consideration in the differences in operation.

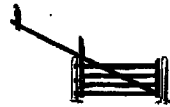
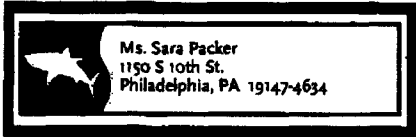
- Forms – there are numerous sections in the proposed regulations where forms are referenced. The proposed forms should be part of any regulation package. Without the benefit of reviewing these documents, the proposed regulations should remain “proposed” until ample opportunity has been given to interested parties to review the format and content of these documents.
- Notifications – there are greater than 20 separate notification requirements of the operator for the completion of a new well in the proposed regulations. This appears to be excessive.

This concludes my comment summary. I would like to thank the EQB for the opportunity to present my formal comments for consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey P. Walentosky", written over a horizontal line.

Jeffrey P. Walentosky, P.G.



RECEIVED

MAR - 5 2014

INDEPENDENT REGULATORY
REVIEW COMMISSION

FEB. 15, 2014

DEAR BOARD MEMBERS,

I APPLAUD YOUR DECISION TO UPDATE CHAPTER 78 OF THE PA CODE ISSUED UNDER THE OIL AND GAS ACT, BUT URGE YOU TO STRENGTHEN SOME OF THESE CRITICAL PROTECTIONS. NOW IS THE TIME TO MAKE SERIOUS CHANGES TO THESE POLICIES:

- PROHIBIT THE USE OF OPEN-AIR FRACK PITS/IMPOUNDMENTS, AND REQUIRE A CLOSED-LOOP SYSTEM THAT UTILIZES ABOVE-GROUND TANKS FOR STORAGE OF WASTEWATER.
- MANDATE STANDARDIZED BASELINE TESTING AND MAKE THAT INFORMATION AVAILABLE TO THE PUBLIC.
- REQUIRE DRILLING COMPANIES TO REMEDIATE CONTAMINATED WATER SUPPLIES TO SAFE DRINKING WATER ACT STANDARDS.
- COMPEL COMPANIES TO IDENTIFY EXISTING WELLS BEFORE NEW WELL CONSTRUCTION, IN ORDER TO PREVENT NEGATIVE IMPACTS ON WATER SUPPLIES AND THE ENVIRONMENT.
- MAKE COMPANIES PLUG AND SEAL (OR OTHERWISE APPROPRIATELY ADDRESS) ABANDONED AND ORPHANED WELLS, ACCORDING TO STATE SAFETY STANDARDS, PRIOR TO NEW WELL SITE CONSTRUCTION.

I APPRECIATE YOUR CONSIDERATION OF THESE RULE CHANGES, AND YOUR DEDICATED EFFORTS TO KEEP MY FAMILY AND ALL PENNSYLVANIA US SAFE & HEALTHY.

SINCERELY,
Sara S. Packer

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MAR - 5 2014

INDEPENDENT REGULATORY
REVIEW COMMISSION

TO: Environmental Quality Board.

Subject: Please (allow) pass the revisions to
PADEP's oil and Gas rules be finalized in their
current form.

We are not supporters of the gas and oil industry
in pennsylvania and believe they should have more
regulations. Without regulations we believe they will
run wild. In short the only thing between
them and the environment isn't a conscience
its you!!! Please continue your excellent work
and advance regulations to protect the environment
we share in pennsylvania. Due to your hard
work and committent we can maintain the
standards of pennsylvania for many generation
to come.

The environment we leave for future generations will be here
long after the "quick" money is gone.

Regards,

William M. Weiers

~~William M. Weiers~~

This form and Cover letter attached was sent
to my family by Kribel Companies we do not
agree with them. (my mother and I)

William Weiers
118 Garfield Rd.
Mt. Pleasant, Pa.
15666

February 5, 2014

Important -- Please Join with Us to Help Protect Our Energy Future:

Over the last couple of years, the Pennsylvania Department of Environmental Protection has been developing and revising laws and regulations that govern the oil and gas industry. We, along with many other individual members and groups, have been working hard to stop the Department from over-regulating our industry, especially the independent conventional well operators like the Kriebel Organization. If enacted, these new regulations will likely have a lasting negative impact on the oil and gas industry, the many businesses that support our industry, and also our energy future.

The process of revising these regulations includes a public comment period for anyone who wants to share comments directly with Pennsylvania's Environmental Quality Board. To join us in trying to protect our energy future, please sign the attached comment letter and use the label provided below to mail it to:

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

If you would prefer to write your own letter instead of using the attached letter, please feel free to do so. The volume of comments received by the Board matters, therefore your comments are very important. We anticipate that the environmental groups and those who oppose oil and natural gas development will be flooding the Board with comments as well. **We must make our voice heard!**

If you have any questions about the proposed regulations, please call Dave Ochs, Senior Geologist, at 1-800-821-4911. Thank you in advance for your help.

The deadline for submitting comments is March 14, 2014

Mailing Label:

Instructions: Bend the attached label slightly to make it easier to remove the center label which is the mailing label.

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

February ____, 2014

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

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. I am a property owner who earns royalty revenue from conventional oil and gas activity on my land, and I am concerned that the added burden of increased regulation and associated costs could significantly harm the industry while providing little or no added benefit to the environment.

From what I see, Pennsylvania's environment is in good hands with the oil and gas industry. Those who work on my property and others I encounter in this industry live, work and play in the same areas where the oil and gas industry operates, and they all share a passion for protecting the Commonwealth's natural resources. It is obvious that they – like me – 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. It is obvious to me that the onset of Marcellus shale drilling has sparked these proposed changes, so why not concentrate on regulating that portion of the industry and leave the conventional industry as it currently is? 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 could mean smaller royalty payments for me and my neighbors. For many of us, royalty revenue has breathed new life into family farms and small businesses all across Pennsylvania. Decreased oil and gas activity will also mean fewer jobs in the 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.

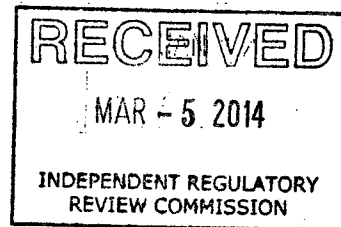
Sincerely,

Signature

Street Address

City, State & Zip Code

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



Dear Boardmembers,

I am the operator of shallow, conventional wells in NY and have been made aware of the regulations currently being considered for approval by your board. I am writing to express my opposition to the passage to those regulations.

Shallow oil and gas wells have operated in this area for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment while allowing producers to operate ~~profitability~~ profitably through most of those years.


I can assure you that legacy wells that produce gallons of oil per day, or a small amount of MCF's of gas, will not be able to tolerate the cost of these additional regulations. This will result in more unemployment, loss of production vital to our local refinery (where I am also employed), the reduction of our local tax base and cause harm to all the local businesses that depend on the millions of dollars our production puts into the local economy. Also, forcing small producers out of

business may add thousands of wells to the abandoned well list the state will be burdened with plugging.

Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. The regulation package as it now stands is overly broad, burdensome and time consuming without adding meaningful protection the environment.

I urge you to vote "NO" to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

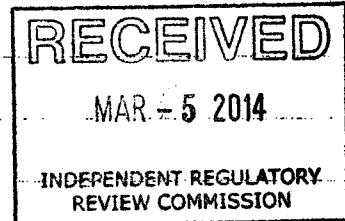
Sincerely


Nathan Frederico

N. Frederico
706 S. Kendall Ave.
Bradford, PA 16701

1713 Oakwood Drive
Hanover, PA 17331
December 17, 2013

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




Board:

There would never be enough oil and gas regulations in PA to protect the people and the environment. Put people and nature above money and greed.

Ban hydrofracturing and invest in renewable energy sources, not fossil fuels.

Anne F. Quashnoc

Anne F. Quashnoc


John J. Quashnoc

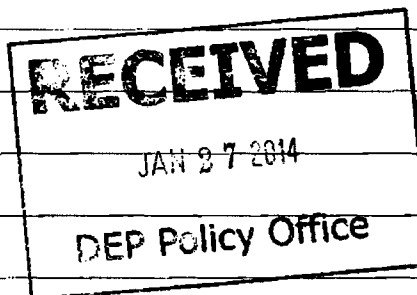
1713 Oakwood Dr.
Hanover, PA 17331

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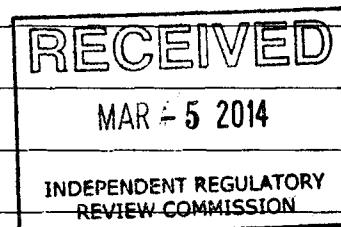
ENVIRONMENTAL QUALITY BOARD

Brian Best
2660 Nickleville Rd
Emlenton PA 16323



1/22/2014

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



Dear Board Members,

I am an operator of shallow, conventional wells in Western Pennsylvania and am aware of the regulations currently being considered for approval by your board. I am writing to express my opposition to the passage of these regulations.

Shallow, conventional oil and gas wells have operated in this industry born state for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment, which is our main goal, while allowing producers to operate profitably through most of these years.

I can assure you that legacy wells that produce gallons of oil per day will not be able to support the cost of these additional regulations. This will result in more unemployment to an already struggling area, loss of production vital to our local refinery, the reduction of our local tax base, and cause harm to all local business that depends on millions of dollars our production puts into our dependable and life sustaining

local economy. Also, forcing small producers out of business that would add thousands of wells to the abandoned well list that the state will be burdened with plugging.

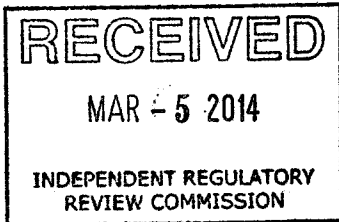
Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. Unconventional wells are drilled, stimulated, and produced in a vastly different operation than conventional wells, thus resulting in a different set of regulations that should govern them. The regulation package as it stands now is overly broad, burdensome and time consuming without adding meaning to protecting the environment, as we all should hold to our numbers. One priority.

I urge you to vote NO to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

I appreciate you taking the time to take all of our opinions and production procedures into account when you make decisions that can and will affect the lives of thousands of people that strive to make a living in state the oil industry was born in.

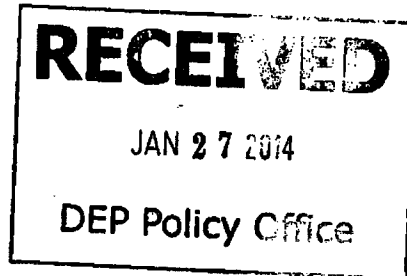
Sincerely

Brian Burt



Rosa J. Jack
114 Grandview Avenue
Chicon, PA 16025-4302

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



Dear Board Members:

I lease my land for oil and gas development; I receive royalty payments for production from conventional oil and gas wells. It has come to my attention that the Department of Environmental Protection (DEP) has proposed changes in regulations affecting the oil and gas business.

I understand that these new and modified regulations will unnecessarily increase costs for oil and gas companies, and will be particularly costly for companies operating conventional gas wells. While the regulations will significantly increase costs, the regulations will not result in significant environmental benefits in conventional oil and gas wells in the industry.

The oil and gas industry is vital as an economic engine as well as a job supplier. As a taxpayer, I rely on the money I receive from the oil and gas development on my property, especially during these -

- Difficult economic times. The increase in costs for the oil and gas industry directly affects my financial situation and will ultimately lessen my income.

Ironically, under existing regulations the conventional oil and gas industry has had a minimal impact on our environmental resources. Why do the new regulations make such significant changes to the conventional oil and gas industry?

I strongly oppose these new regulations. In addition to causing severe economic harm to the oil and gas industry, they will have detrimental effects to the community as a whole. More regulations, at a time when the economy is so unstable, is reckless and will only damage our economy further, and all of these negative consequences will result from new regulations that will bring insignificant environmental benefits.

For these reasons it is important that these new regulations not be passed in their current form. Please vote "NO" to the current regulations until they are altered to account for the economic well-being of the Commonwealth of Pennsylvania.

Sincerely,
Rose D. Jack

This letter is written in direct response to Oil City Engineer, Chris Sporer's public comments regarding Act 13 generally and the protection of the Oil City water supply in particular. I write this letter from the perspective of a lifetime resident of Venango County, a landowner with in excess of 100 acres, a landowner within Zone III of the Oil City water wells, and an experienced employee in the oil & gas industry as a retired Senior Gas Measurement and Regulator Specialist for National Fuel Gas.

Let me begin by saying that I believe state regulation of the oil & gas industry, as well as protection of our water resources is a good thing. However, overregulation of oil & gas exploration is almost as detrimental as proper regulation is beneficial. To that end, the greatest scientific mind in the history of our country, Albert Einstein, had it exactly right whenever he said, "Make everything as simple as possible, but not simpler."

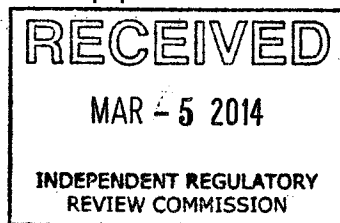
As such, the Department of Environmental Protection already has proper and sufficient regulations in place to accomplish the dual purpose of regulating the oil & gas industry and protecting our natural resources, in particular our water.

A few ways that our water is already protected are as follows: First, the drilling of deep or unconventional oil & gas wells is thousands of feet below the aquifers, which means any fracking done will not communicate with the aquifer. Second, any bore hole that penetrates the aquifer is already protected pursuant to DEP regulations and industry best practices by multiple layers of casing and cement. Third, all of the landowners within a 3,000 foot radius of the well are notified so that they can object if they see fit in order to protect their water supply or for some other reason.

Further, in relation to the Oil City water wells in particular, they already have more than enough protection given the above regulations, as well as for a number of other reasons. Namely, the water wells are located on 300 acres of land owned by the city, which means they already have a protective buffer zone of almost one-half of a square mile (a square mile being approximately 27.9 million square feet and the 300 acres being approximately 13.2 million square feet). This protective zone is well in excess of the 105 acres (4.6 million square feet) required for Zone II protection.

Moreover, in the event that a Zone III classification is imposed on the Oil City water wells my farm and most of my neighbors' and friends' properties would fall within this Zone. This would essentially result in a *de facto* taking of our oil & gas rights due to the restrictions and liabilities that would be imposed upon us and any oil & gas exploration company that may otherwise be interested in developing our properties. On that subject, development of our properties is not just a fleeting, unrealistic possibility given that our properties were recently leased by Halcon Resources, which spent millions of dollars in order to obtain the right to develop the oil & gas rights under our properties.

To head off such diligent and environmentally responsible development would not only be a financial blow to us as local property owners, but would also be a financial stumbling block for all of our fellow Venangonians who are waiting for an economic resurrection of our county. The DEP should also remember not just to worry about greasing the squeaky wheel (of the 200 people at the meeting 37 spoke according to the Meadville newspaper some for more regulation some for less regulation), but



should maintain focus on the vast majority of Venangonians who have relied on the economics of oil & gas for more than 150 years.

In conclusion, my hope is that the already-in-place responsible regulations and the existing 300-acre buffer zone be determined to be significant, substantial, and suitable protection. Additionally, I would argue that the strong standing regulations already in existence be used to regulate the oil & gas industry rather than imposing greater, unnecessary regulations that would unduly restrict Venango County's – and Pennsylvania's – economic resurrection. Some may think that the current regulations are simple, however, these regulations are perfect in their simplicity.

Matthew H. McSparren

271 Oakwood Rd.

Oil City, PA. 16301

January 14, 2014

Environmental Quality Board Members
Re: Environmental Protection Performance
Standards at Oil & Gas Well Sites

P.O. Box 8477

Harrisburg, PA 17105


Gentlemen,

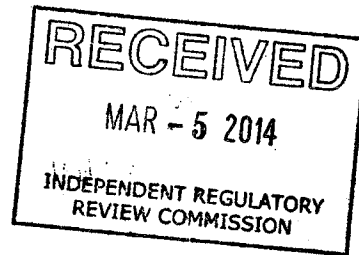
Please require operators to restore any contaminated water supplies to Safe Drinking Water Act standards.

Also, please extend the comment period to 120 days.

Kindly acknowledge receipt of this correspondence.

Thank you.


Raymond R. Stankiewicz
2124 Horace Avenue
Abington, PA 19001



To: Board Members

From: David and Janet Ellis

Re: Proposed changes in regulations

Date: 1-13-14

Currently we lease our land for oil and lease development and are concerned about the proposed DEP regulation changes. It is our understanding that such changes may prove expensive for those companies operating conventional oil and gas wells.

Our particular concerns address the significant changes to the conventional oil and gas industry. These changes surely will result in damage to the economy and will have detrimental effects to the community as a whole.

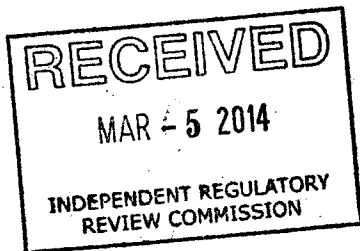
Please consider a change in the current form of the proposed regulations. A "NO" vote to these changes would reflect your concern about the economic well-being of the citizens of Pennsylvania.

Sincerely,

David and Janet Ellis

211 Orchard Lane
Butler, PA 16001

tinniecoco@zoominternet.net



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

RECEIVED

FEB 24 2014

DEP Policy Office

Dear Board Members:

I am the operator of shallow, conventional wells in PA and have been made aware of the regulations currently being considered for approval by your board. I am writing to express my opposition to the passage of those regulations.

Shallow oil and gas wells have operated in this state for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment while allowing producers to operate profitably through most of those years.

I can assure you that legacy wells that produce gallons of oil per day, or a small amount of MCFs of gas, will not be able to tolerate the cost of these additional regulations. This will result in more unemployment, loss of production vital to our local refinery, the reduction of our local tax base and cause harm to all the local businesses that depend on the millions of dollars our production puts into the local economy. Also, forcing small producers out of business may add thousands of wells to the abandoned well list the state will be burdened with plugging.

Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale or unconventional wells. The regulation package as it stands now is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

I urge you to vote NO to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

Gary & Kathleen Ward
459 Sartwell Rd, Eldred, PA 16731

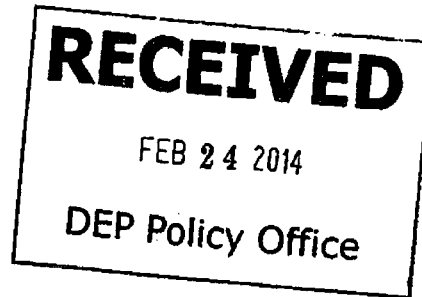
RECEIVED

MAR - 5 2014

INDEPENDENT REGULATORY
REVIEW COMMISSION

Sincerely, Kathleen Ward
Gary S. Ward

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



Dear Board Members:

I am the operator of shallow, conventional wells in PA and have been made aware of the regulations currently being considered for approval by your board. I am writing to express my opposition to the passage of these regulations.

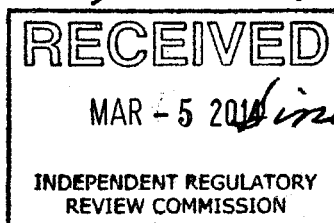
Shallow oil and gas wells have operated in this state for over 150 years and regulations currently governing these wells have been more than adequate to protect the environment while allowing producers to operate profitably through most of those years.

I can assure you that legacy wells that produce gallons of oil per day, or a small amount of MCF's of gas, will not be able to tolerate the cost of these additional regulations. This will result in more unemployment, loss of production vital to our local refinery, the reduction of our local tax base and cause harm to all the local businesses that depend on the millions of dollars our production puts into the local economy. Also, forcing small producers out of business may add thousands of wells to the abandoned well list the state will be burdened with plugging.

Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. The regulation package as it stands now is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

I urge you to vote NO to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

Gary L. Ward
459 Sartwell Rd.
Eldred, PA 16731-2623



Sincerely,
Gary L. Ward

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

11 Jan 2014

Dear Sir:

For many years I have been leasing my lands for oil and gas development. I have been receiving royalty payments from conventional oil and gas wells. Now the DEP has proposed changes in the regulations affecting the oil and gas business.

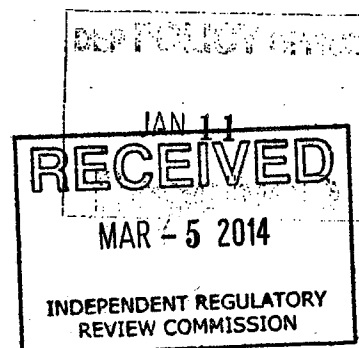
These new regulations will unnecessarily increase costs for oil and gas companies, and will be particularly costly for companies operating conventional shallow oil and gas wells. Whilst these regulations will not result in significant environmental benefits, they will greatly increase cost for shallow drillers.

The new regulations will make my oil and gas properties less valuable and may cause most of my royalty income to vanish. The 11 wells I have near my house have never had any deleterious affect on the environment and they were drilled many years ago.

As a voter and high tax payer I oppose the proposed new regulations and urge you to vote **NO** to them until they are altered to keep the old regulations in force for the drilling of shallow oil and gas wells.

Sincerely

Frederick J. Young, Ph. D.
Emeritus Professor of Energy
Pennsylvania State University



F. J. Young
300 Minarco Run Road
BRADFORD, PENNSYLVANIA 16701-3718



3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Tuesday, March 04, 2014 7:51 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:

francis x daley jr
(fxdaleyjr@gmail.com)
666 summit ave
phila, PA 19128 US



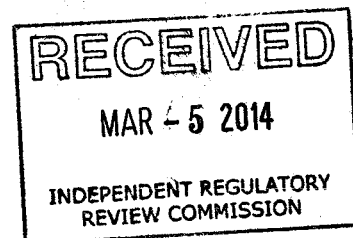
Comments entered:

Thank you for updating C78 of the Gas and Oil act. Please: prohibit the use of open-air impoundments and mandate closed-loop systems with above ground storage; Mandate standardized baseline testing; require drillers to remediate contaminated water supplies to SDWA standards; compel companies to identify existing wells before new drilling; require companies to plug and seal abandoned and orphaned wells according to state safety standards. Thank you for your consideration.

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

Environmental Quality Board
P.O. BOX 8477
HARRISBURG, PA 17105-8477

RECEIVED
FEB 19 2014
DEP Policy Office

Dear Board Members:

I am a concerned citizen of Pennsylvania and have been made aware of the regulations currently being considered for approval by your board. I am writing to express my opposition to the passage of those regulations. Shallow oil and gas wells have operated in this state for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment while allowing producers to operate profitably through most of those years.

I can assure you that legacy wells that produce *gallons* of oil per day, or a small amount of MCF's of gas, will not be able to tolerate the cost of these additional regulations. This will result in more unemployment, loss of production vital to our local refinery, the reduction of our local tax base and cause harm to all the local businesses that depend on the millions of dollars our production puts into the local economy. Also, forcing small producers out of business may add thousands of wells to the abandoned well list the state will be burdened with plugging.

Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. The regulation package as it now stands is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

I urge you to vote "NO" to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

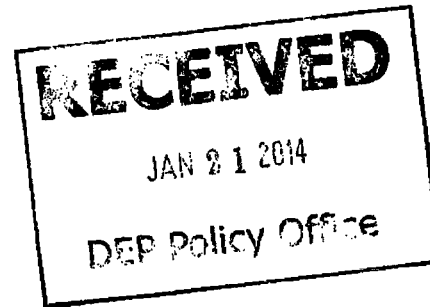
Sincerely,



RECEIVED
MAR 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

 Mr. Gregory Jandrew
409 Blauvelt Hollow Rd.
Shinglehouse, PA 16748

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



Dear Board Members:

I understand that the Board Members are contemplating making changes to the current Act 13 oil and gas regulations governing oil and gas productions of both shallow and deep drilling operations.

After hearing and reading about some of the changes that are to be made, I feel that they will be detrimental and of great financial harm to our local shallow well driller/producers. I feel that shallow well and deep well businesses should be dealt with separately.

You must know that the shallow well driller/producer has been in the business for over one hundred fifty (150) years in this area. Most of these owners operate wells that produce one (1) barrel or less of oil per day, so the operating profit margin is very small. If they are to be burdened with more regulations, then they will be forced to cease all production and lay off what few employees they may have.

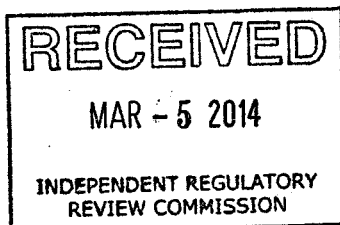
With oil production very low in this area to go along with high unemployment, it would be devastating to this area to have our driller/producer burdened with more regulations that increase their cost of production of American produced oil and gas.

As a retired person of this area I would like to see our local oil and gas producers stay in business. When I was still working, I spent all my working life (45 years) working either in the field or for a manufacturing company that produced oil and gas production equipment.

With that said, I would urge your board to vote NO on changes to Act 13 concerning shallow well drilling/production.

Sincerely,

Wade E. Confer
Wade E. Confer
25 Schoolhouse Road
Bradford PA 16701



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

January 10, 2014

JAN 10 2014

Dear Board Members

I own and operate 20 shallow oil and gas wells in Warren County, Pennsylvania.

I am considering if I can drill more wells.

I am aware of new regulations being considered by your board. I oppose passage of these regulations.

Shallow gas and oil wells have operated in our state for more than 140 years. The regulations currently governing these wells are more than adequate to protect the environment.


My existing old wells produce only a few gallons of oil per day. These wells will not be able to cover the cost of these additional regulations. The proposed new regulations will force me to terminate these old wells and reconsider drilling any additional wells.

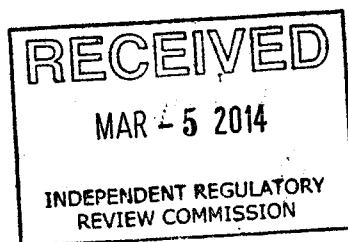
Drilling and operating conventional wells must not be regulated by the same rules as deep wells. The regulation package as it stands is overly board and burdensome without adding meaningful protection to the environment.


Please vote "NO" to the proposed new regulations. Please allow conventional wells to operate under the same regulations in place before passage of Act 13 of 2012.

Thank you for your consideration.

Sincerely yours,


James A Cripe
3800 Zimmerly Road
Erie PA 16506



 Mr. James Cripe
3800 Zimmerly Rd.
Erie, PA-16506-4834

February 3, 2014

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



Please ask the scientists about the research that has, and is, being done by researchers from universities including Carnegie Mellon, Cornell, Duke and Yale regarding air quality, human and animal health, effects on water treatment plants and local government response to shale gas development.

Why has gas drilling and fracking been exempted from following the restraints of the underground injection control program of the Safe Drinking Water Act?

Please refer to the Duquesne University Fracking Conference held on November 25, 2013.

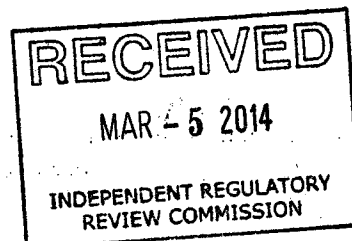
Please consider that fracking contributes to increased mercury and bromides in our watersheds. Please consider the acute toxicity in the emissions from well pads in the Marcellus Shale. People are being exposed BY EPISODE. Gas drilling health findings show the acute toxicity in episodes to be respiratory, neurologic, dermal, vascular bleeding, abdominal pain, nausea, vomiting and stress!

Please EQB, hold big oil and gas accountable for its actions. Please save Pennsylvania and put a moratorium on Hydraulic Fracturing until Chesapeake Energy, Range Resources and all of the other big oil and gas companies PROVE (by scientific testing and disclosure of the toxic chemicals being poured into and coming out of the earth) that it is safe. Demand that environmental impact studies be done by independent scientists (not the oil companies).

Sincerely for clean air and water (our true life sustainers),

A handwritten signature in cursive script, appearing to read "Lani Fritz".

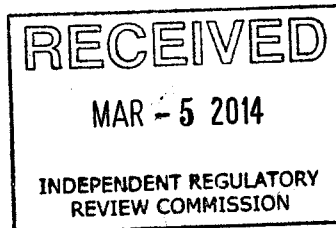
Mrs. Lani Fritz
106 Magnolia Drive
Beaver PA 15009



JAN 16

January 15, 2014

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



Thank you EQB for giving me a voice on oil and gas development in Pennsylvania. I am writing for the protection of our streams and waterways from oil and gas drilling operations. Act 13 is unconstitutional as a "Special Law". My right to live in a residential area free of industrial sites has been violated. My Township Supervisors were forced to change our Township Ordinances to comply with Act 13 and the demands of Chesapeake Energy to frack and run oil and gas pipelines here. I am quoting from my Brighton Township Newsletter in December, 2011: "However, to a large extent, the Pennsylvania Oil and Gas Act **preempts local regulation and puts regulatory authority into the hands of the PA Department of Environmental Protection.** The Act preempts local regulations of any kind where it regulates the same features of oil and gas well operations regulated by the Oil and Gas Act. This includes most of what are the technical and **environmental** aspects of the operations."

I am opposed to Hydraulic Fracturing for oil and natural gas and have requested that the DEP send me a complete list of the toxic chemicals being poured into the earth near my home at the Chesapeake Energy Jenkins Well Pad in Brighton Township, PA, and also all of the chemicals coming from the well including radiation levels! I have not received this information and want to know why!

Regarding the specifics of the new regulations, following is a list of recommendations:

All fluids related to oil and gas development should be contained in engineered facilities not "natural depressions".

The permit applicant and the PA Fish, Boat and Game Commission (not the DEP) should be responsible for determining whether proposed oil and gas operations would affect threatened or endangered species.

The DEP should respond to comments received about permits that may affect an important public resource.

Page 2.

Please vote to maintain "seasonal high groundwater table" for clarity and consistent enforcement.

DEP's investigation should extend to all oil and gas activities. I am deeply concerned about the proposed Shell Cracker Plant in Potter Township, Beaver, Pennsylvania! It will be built directly on the Ohio River and I demand to see an environmental impact study before it is built!

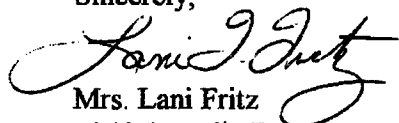
The construction of fluid storage areas within 100 feet of certain water bodies should be extended to all water bodies.

The DEP should stop promoting the disposal of residual waste at well sites.

The DEP's proposed regulation for the road spreading of brine poses unacceptable threats to the Commonwealth's water resources.

I close as a very concerned citizen who will continue the fight for our clean air and water, for our forests and wildlife. This is what will sustain us... not oil and gas!

Sincerely,



Mrs. Lani Fritz
106 Magnolia Drive
Beaver PA 15009

Matthew Boswak
209 Kathleen Drive
New Castle, PA 16001

Tuesday, January 28th, 2014

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

RECEIVED

FEB 21 2014

DEP Policy Office

Dear Board Members:

I am a concerned citizen that believes that the enforcement of regulation of production water from PRE-1985 wells is emphatically wrong from a historical standpoint.

Wells drilled after Act 223 were drilled knowing the regulations and knowing water had to be collected and disposed of in some manner. Pre-1985 stripper wells have had production water disposed of on the ground for more than 25 years and this has never presented a major problem.

A DEP official on a PBS special stated that brine water from stripper wells was not a problem. On the other hand, many Marcellus gas wells are drilled near housing developments very close to water wells.

The fact that many of these historical wells are still being drilled is a miracle unto itself- whether it's Mother Nature or human initiative or both, it's impressive.

Does Pennsylvania want to protect historical pre-1985 stripper wells or let them get shuffled under the pretense of modern life?

Please vote "NO" on the proposed changes to regulations, as they apply to conventional oil and gas wells. Allow the shallow wells to operate under the regulations in place before passage of Act 13 of 2012, and instruct the DEP to apply changes to nonconventional, deep wells ONLY.

For your consideration.

Sincerely,


Mr. Matthew Boswak

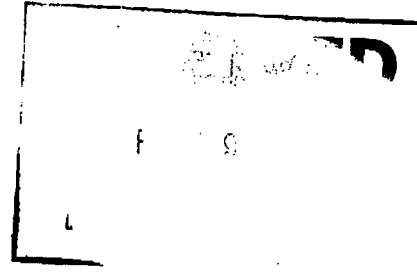
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MAR -5 2014

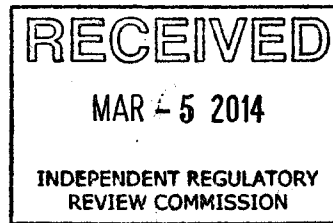
INDEPENDENT REGULATORY
REVIEW COMMISSION

John G. Cochran, II
203 Edgevale Road
Baltimore, MD 21210



February 3, 2014

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



Dear Board Members,

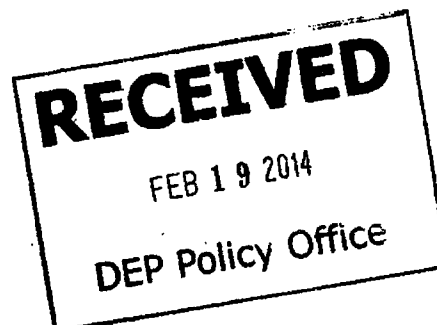
My late father's family has been in the oil business in northwestern Pennsylvania since the late eighteen hundreds. My daughter, 11, and son, 9, are the 5th generation to be involved in the family business. Both of them have been to our properties several times over the years and enjoy learning about the family business and its history. We no longer drill our own wells but lease our properties to local operators who love the oil business, appreciate the beauty of the forest, and adhere to environmental regulations. These operators have made me aware of the negative impact of the regulations being considered by the Board.

All of our wells are drilled to a depth no deeper than 3,000 feet, averaging around 2,000 feet, and should not be regulated by standards set for deep drilling. Strict regulations are already in place and monitored by the U. S. Forest Service

Please vote **AGAINST** the proposed regulations and allow shallow wells to operate under the regulations that are currently in place. The regulations before the Board are too broad, overly burdensome, and time consuming without adding meaningful protection to the environment. Additionally, I ask that the Board vote **AGAINST** the proposed legislation so that future generations can grow up and enjoy the oil business as much as I do.

Sincerely,


John G. Cochran, II



11 30
13 March

DEAR BOARD MEMBERS: FEB 1, 2014

I AM A SMALL OIL PRODUCER OF SHALLOW OIL WELLS. I HAVE 24 WELLS. I HAVE OPERATED THESE WELLS SINCE 1984. THESE ARE OLD WELLS. THESE NEW LAWS + REGULATIONS WOULD CAUSE HARDSHIP ON MY SELF AS THE OWNER. I DONT PUMP THAT MUCH OIL. HOW DO I PAY FOR THIS? ACT 13, 2012

PLEASE USE YOUR UNDIVIDED DISCRETION FOR THE LITTLE GUYS AND REPRESENT US.

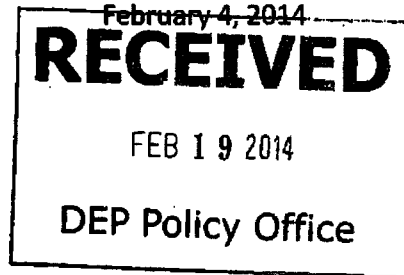
THANK YOU, John A. Savko

RECEIVED
MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

RECEIVED
FEB 19 2014
DEP Policy Office

JOHN A. SAVKO
96 OLD PITTSFIELD ROAD
YOUNGSVILLE, PA. 16371

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



Dear Board Members:

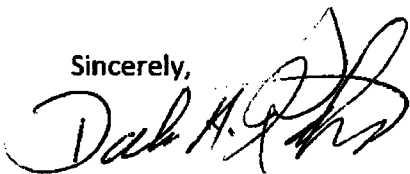
I am writing this letter because I am concerned about the addition of new regulations to conventional wells under Act 13. It will bring additional costs that cannot be sustained by the small quantities of oil and gas produced by these wells.

I am over 70 years old and my wells supplement my retirement - \$893.00 a month Social Security is impossible to live on. The new regulations will put many small producers like me out of business, eventually causing refineries to close - greatly affect the economy of north western PA.

Shallow oil and gas wells have operated in this state for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment while allowing producers to operate profitably through most of those years.

Please vote "NO" to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012

Sincerely,

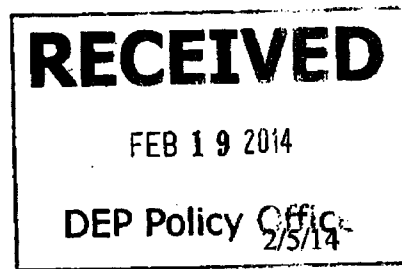
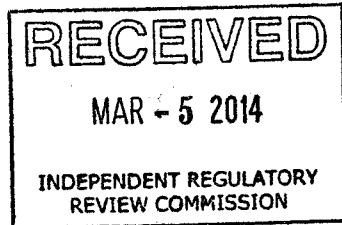


Dale A. Kaber

Independent Producer



Dale A. Kaber
505 Kohler Dr.
Shippensburg PA
17254



Members of the Environmental Quality Board,

I was in attendance at the hearing held in Indiana, PA on 1/23/14 regarding the proposed regulations for gas and oil activities. I want to thank you for coming to Indiana on this very important issue.

I am 77 years old and it was a pleasure to see so many young people testifying on behalf of the environment. I am pro energy, all types including coal, gas, oil, wind, solar, nuclear, hydro, and any that I might have missed. But above all I am for clean water.

It has been 40 plus years since the clean water act was passed, and we have somewhere in the neighborhood of 50 AMD sites that are not being treated. This is not the fault of this administration because over the last 40 plus years both parties have been in power.

One of the issues that was not addressed at the hearing in Indiana was the presence of bromides in oil and gas wastewater. Wastewater is being discharged on isolated dirt roads on state game lands for the purpose of dust control. This water contains bromides and is entering PA's source water streams which feed all of PA's major rivers including the Susq. which provides water for Harrisburg.

For your information bromo seltzer was reformulated in 1975 to remove all of the bromides. Therefore, better regulation of bromides and other harmful matter entering our water supply are in order.

We must remember the water contamination in Charleston, WV and the present drought in CA. It is important that we take care of our water for our children, grandchildren and for future generations. We must remember the young people that testified at the meeting in Indiana County. They are aware of these problems, and want to keep our water clean.

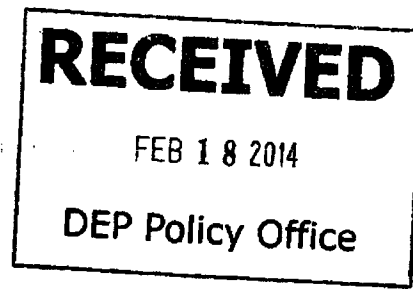
In conclusion, we must look beyond the mineral extraction era for economic development. I believe that in the long run that a clean environment creates a better economy. Look at Germany. Germany has some of the most strict water quality standards in the world and still has the best economy in Europe!
Thank you for all the work you do in protecting our greatest resource.....WATER.

Sincerely, 

John T. Dudash
224 Jacksonville Road
Homer City, PA
724/479/8919

February 7, 2014

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



Dear Board Members:

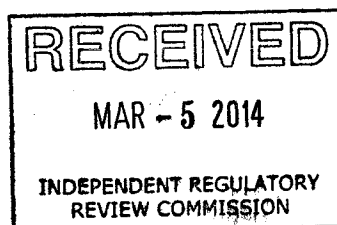
I am writing because I am worried about the harmful effect that the DEP's proposed oil and gas regulations will have on the conventional oil and gas industry and, in turn, on our local economy.

I understand the proposed regulations will impose unnecessary costs for the conventional oil and gas companies and that the content of these regulations was drafted in response to the large footprint of the unconventional Marcellus Shale type wells, both above and below the surface.

The proposed new regulations will be a hardship on many conventional oil and gas companies that have operated successfully and safely for many years under the former DEP regulations. The residents of Pennsylvania have lived and worked in the presence of conventional drilling and production activities without incident for many years. In making regulatory changes that include large unconventional wells with small conventional wells, the DEP has not considered the differences between these types of wells and properly analyzed the costs to the small conventional oil and gas companies as well as the impact on local economies. I believe that separate regulations should have been and should be considered for the conventional oil and gas companies.

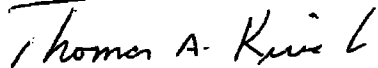
The conventional oil and gas companies are **PENNSYLVANIA SMALL BUSINESSES** that have always employed local workers and vendors. I am deeply worried about how these **PENNSYLVANIA SMALL BUSINESSES** will be able to pay for compliance with the proposed new regulations.

The increase in costs to the conventional oil and gas companies will burden an already tight market for the conventional companies and their employees. The influx of the Unconventional drilling activity has saturated the gas prices to their lowest levels in years due to the large quantities of gas being brought to the marketplace. These unconventional drilling companies can and should absorb the additional costs being proposed by these new DEP regulations due to the type of drilling activities being used which are dissimilar in many ways to the conventional drilling activities and more likely to negatively impact our environment. A one size fits all approach to regulating drillers does not work.



The conventional oil and gas industry is vital to our community as a job supplier and as a patron of many businesses. It is important that these proposed regulations not be passed in their current form. **Please vote "NO" to these changes until they are altered to support the economic well being of the Commonwealth of Pennsylvania. Do not allow another regulatory change to be implemented without considering the harmful effects on the small business community of Pennsylvania.**

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Kirsch".

Thomas A. Kirsch
1205 Airedale Drive, Bethel Park, PA 15102
412-292-9858

Dec. 19, 2013

DEP POLICY OFFICE
DEC 17 2013
RECEIVED

Environmental Quality Board

I am a fourth generation oil producer. We have supported our families for over a hundred years working in the oil fields. If these chapter 78 regulations get adopted into law we will be forced to go out of business.

These regulations were written for the Marcellus wells but they now include the conventional wells. We are two completely different industries. The Marcellus should have their own regulations and inspectors. The conventional wells should go back to the Oil and Gas Act of 1984 and have our own inspectors and have regulations enforced with reasonable and knowledgeable enforcement.

Please do not pass these regulations until they excluded us small producers. If you change the regulations it will save many jobs and our refinery.

Thank you for your time and consideration on this very important matter.

Sincerely,

Mark L Cline

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MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

Mark L Cline
1577 Prentissvale Rd
Eldred, AA. 16731

January 16, 2014

Matthew H. McSparren
271 Oakwood RD.
Oil City Pa. 16301



RE: Oil & Gas Industry Qualifications

To Whom It May Concern:

I have been in the natural gas industry since 1976. I was employed with National Fuel Gas from April 1976 until I retired on February 1, 2012. After retirement, I have been involved in the industry doing royalty verifications and consulting work in the natural gas industry.

From April 1976 through November 1982 I worked at several roustabout type jobs, working on wells, well tender, equipment operator, and pipeline inspector. From November 1982 to July 1992 I was a pipeline welder/fabricator. My duties included welding pipeline, building and installing meter and regulator stations, and welding taps on high pressure gas lines while the line was in service. Almost all of this welding included 100% x-ray of the welds and hydrostatic testing to 90% yield of the pipe and fittings.

From July 1992 through January 1999 I was a Gas Measurement Technician. After three years of training and completion of two college semesters (35 credits) toward an associate degree in electronics, I was promoted to Senior Gas Measurement Specialist covering 9 counties in Northwestern Pennsylvania.

I have been D.O.T. qualified (through National Fuel) in several operation systems including odorization systems orifice meter measurement, positive displacement measurement, ultrasonic measurement, chromatographs, and several different types of regulators and relief valves. My D.O.T. qualifications are good through February of this year.

If necessary, I would be more than happy to provide references or certificates from schools upon request.

Matthew H. McSparren



Karen McSparren
271 Oakwood Rd
Oil City, PA 16301-4006

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

January 16, 2014

JAN 16

Dear Board Members:

I am writing to ask the proposed revisions to PADEP's oil and gas rules not be finalized in their current form. I earn royalty revenue from oil and gas activity and I am concerned that the added burden of as much as \$100 million per year could significantly harm the industry while providing little or no added benefit to the environment.

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 me that the wellbeing of the people and the prosperity of our communities are every bit as important as Pennsylvania's natural resources.



Phillip G. Hillen
195 Riley Ln
Heathsville, VA 22473

RECEIVED
MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

462 Bailey Avenue
Pittsburgh PA 15211
January 21, 2014

Environmental Quality board
P O Box 8477
Harrisburg PA 17105-8477

Dear Board Members,

The proposed revisions to PADEP's oil and gas rules must not be finalized in their current form! As a property owner who receives royalties from gas activity on my land, on which I rely for the upkeep of the property, I will be severely disadvantaged by the proposed added burden of millions of dollars which would significantly harm the industry and not benefit the environment.

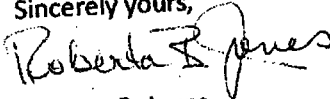
As I see the operators of the oil and gas business in Pennsylvania working on my property and others I can see that we are presently in good hands. They are interested in the prosperity of their business, but at the same time are living and working in the area and know the environment, and strive to protect the Commonwealth's natural resources and our health, and that of our children and grandchildren,

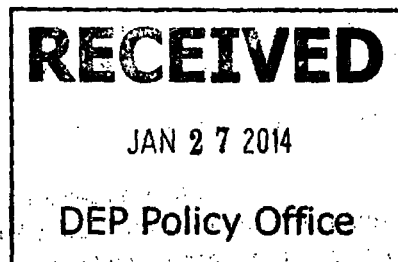
As a former government employee I am all too aware that regulations are necessary and at times need to be updated, but they must not be updated to the disadvantage of those they serve. Creating new regulations for the sake of change, when they do nothing more to enhance the environment, and would reduce the incomes of the businesses and us landowners makes no sense.

To continue and increase the level of oil and gas activity in Pennsylvania, not increase the number of government (or contracted out) jobs to install and enforce the additional regulation, maintain and increase the number of wells drilled and the income of the businesses and landowners (thus increasing the already in existence tax revenues from these incomes), keep the job growth in the industries and communities supporting it, you must vote "NO" to the current proposal.

Please consider only changes that are necessary and reflect the full consideration of costs and benefits of the regulation. You have the opportunity here to let the people of Pennsylvania know they are as important and our natural resources. I will applaud your doing the right thing!

Sincerely yours,


Roberta B. Jones



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

RECEIVED

FEB 19 2014

DEP Policy Office

I have a royalty interest for production from oil and gas lease. It has come to my attention that the Dept of Environmental Protection (DEP) has proposed changes in regulations affecting the oil and gas business.

I understand that these new and modified regulations will unnecessarily increase costs for oil and gas companies, and will be particularly costly for companies operating conventional oil and gas wells. These regulations will significantly increase costs, and the regulations will not result in significant environmental benefits in the conventional oil and gas industry.

As a taxpayer, I rely on the income from this oil and gas lease. Why do the new regulations need to make such significant changes to the conventional oil and gas industry? I oppose these new regulations, which I believe will harm the oil and gas industry, and have negative consequences, which will bring insignificant environmental benefits.

Please vote NO so these new regulations are not passed in their current form.

Thank You

Helen A. Cole

Helen A. Cole
17168 Rt 6
Smethport, PA 16749-4028

cc Martin Causer

RECEIVED
MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

Environmental Quality Board
P.O. BOX 8477
HARRISBURG, PA 17105-8477

RECEIVED

JAN 27 2014

DEP Policy Office

Dear Board Members:

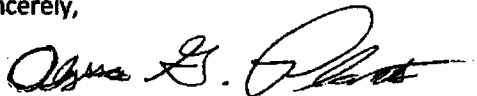
I am a concerned citizen of Pennsylvania and have been made aware of the regulations currently being considered for approval by your board. I am writing to express my opposition to the passage of those regulations. Shallow oil and gas wells have operated in this state for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment while allowing producers to operate profitably through most of those years.

I can assure you that legacy wells that produce *gallons* of oil per day, or a small amount of MCF's of gas, will not be able to tolerate the cost of these additional regulations. This will result in more unemployment, loss of production vital to our local refinery, the reduction of our local tax base and cause harm to all the local businesses that depend on the millions of dollars our production puts into the local economy. Also, forcing small producers out of business may add thousands of wells to the abandoned well list the state will be burdened with plugging.

Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. The regulation package as it now stands is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

I urge you to vote "NO" to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

Sincerely,

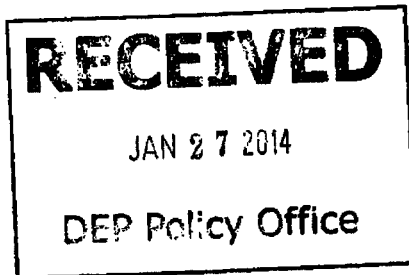


Alysia Plantis
219 Jordan Hall
University Park, PA 16802

Brian M. Stiglitz
45 Dead End Lane
Punxsutawney, PA 15767

1-21-2014

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



Dear Board Members:

The oil and gas business has not always been labeled as a "clean and green" industry. Opponents of the business use this as their number one reason for trying to shut us down time and time again. When the environmental terrorists get their way new regulation is passed making my job as an independent producer and service company employee much more difficult. Needless regulation dealing with small insignificant spills, air quality, chemical contamination, water consumption and many others are all put in place to keep certain people happy.

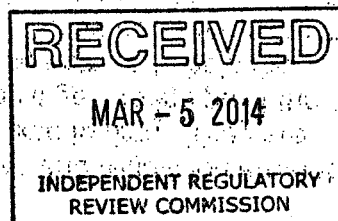
What do these regulations really accomplish? Laws and regulation are not a cure all to accidents that can and do happen from time to time. They are guidelines that we follow the best we can, but when it gets to the point the "rule" book is no longer understandable, and the "rules" do nothing to help the environment we all love and enjoy why should we be held accountable for them? The new updated regulations for Act 13 and Chapter 78 are a prime example of the laws being written by people that know very little about the oil and gas business. Have officials in Harrisburg ever put in a pipe line, drilled a new well or pumped cement on a plug job? Why can't the voices of independent producers as well as industry leaders be heard when laws are proposed? Listening to people that actually work in the field will benefit all the parties involved.

I ask you members of the Board, to please consider that the industry that has provided me a good living thus far in my life is under attack. I urge you to please vote no, to any and all propositions that may adversely affect the oil and gas industry in Pennsylvania. If these laws are passed many people employed in the oil and gas business may loose everything they have ever worked for and be unable to feed their families.

Sincerely,

A handwritten signature in black ink that reads "Brian M. Stiglitz". The signature is written in a cursive style.

Brian M. Stiglitz

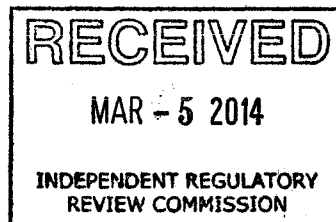


John Allen
288 Dobson Road
Sugar Grove, PA 16350
814 489 7830



January 28, 2014

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



RE: Proposed new rules

Dear Board Members;

I am the operator of shallow, conventional wells in Pennsylvania. In recent years it has become my primary source of income. Also, my wife and I have owned a small excavating contracting business in our area for over forty years. That business grew rapidly during the 1970s through the 1990s primarily because of contracts we had with small, conventional oil well operators. We have worked hand in hand with those operators and for thirty-five years we have had several small leases of our own. **I am writing to ask you to vote "NO" to the proposed new regulations as they pertain to shallow, conventional oil wells in Pennsylvania.**

We own a home in Warren County where we live and work. Over the years our work with other operators and our small operation itself have afforded us the opportunity to employ up to twenty people during the peak years and currently, although we have slowed because of my age, we employ four full time and three part time people. Our small conventional wells pay the payroll. This is a rural area and any kind of employment is highly valued to our economy. The two related businesses have not only supported employees, they have allowed us to be generous contributors to our community, church, local libraries, schools, local and national causes and needy individuals. We pay a lot of taxes in this county.

For the last ten years, the shallow, conventional wells have provided revenue to pay not only our vendors but continue to pay the employees. My plan has been to retire from the excavating business and continue working by operating the oil business until full retirement in approximately ten years. Our oldest son's work has taken him out of state but he plans to return to the area at that time and continue the oil business. This would not only be pleasant for our family, it brings bright, educated minds and young families back to our area. Recently he bought and refurbished a home here which he currently rents out with that plan in mind. Our business plan includes continuity for decades. I recently counted over 115 vendors with whom we have some type of purchasing arrangement to support our well activity. Our full time employees have homes in the area and families here. The part time people are also dependent upon the jobs we offer. In many cases over the years we have trained and mentored numerous young people

who have gone on to college and technical level jobs, some returning to Pennsylvania after school. I explain all of this to show you that while I am a small operator and own a small business, we have always been a vital part of our local economy and have plans to continue to do so.

However, after reading the proposed regulations with the accompanying costs, I can assure you that all for which we have worked and planned will be in serious jeopardy if the proposed regulations go into effect for conventional well operations. The modest return on small leases such as mine would be wiped out. By crushing small operators with unnecessary regulations you will be eliminating jobs, causing hardships and in general killing small business in Western Pennsylvania. The ripple effect from these regulations will be felt all over the state. One of our largest employers in Warren County is United Refinery. Without product, that business faces jeopardy and more people will be out of work.

We have always been law abiding operators. We have operated all these years without causing environmental problems. We are good stewards of the land and conservative producers. We can sustain longevity only if we are not placed in an impossible stranglehold. Many of the proposed regulations simply have nothing to do with shallow, conventional oil wells. They are meaningful when working with deep, unconventional well projects but serve only to put the cost for the small operator to such a level that work will have to cease. The regulations as written now are overly broad, burdensome and time consuming but I cannot see they protect the environment one iota more than current regulations to which we already adhere.

My wife and I are Pennsylvania residents and have always worked here. Please allow us to continue to contribute to our state and community. I should not have to remind you that small business has always been the backbone of our nation. Over-regulation is not productive. I urge you to vote NO to the proposed regulations when applying to shallow, conventional wells. Please put common sense back into Pennsylvania!

Sincerely,

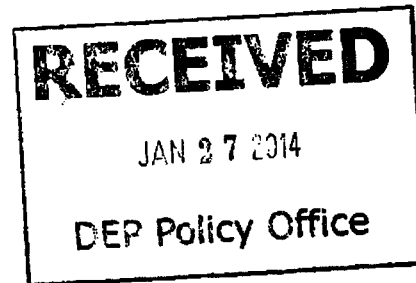
A handwritten signature in cursive script that reads "John Allen". The signature is written in black ink and is positioned above the printed name.

John Allen

Brian M. Stiglitz
45 Dead End Lane
Punxsutawney, PA 15767

1-20-2014

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



Dear Board Members:

I write to you today to express strong opposition to the current new regulations up for vote concerning traditional oil and gas wells in the state. My father and I are independent producers of oil wells in Venango County PA and have produced these wells for nearly 20 years. The passage of any additional regulation will inevitably cause us to shut down and abandon these wells.

Our wells along with countless others in the state do not even make a barrel of oil in a days time, very low production, and thus can not support the money needed to comply with all the new regulations. Even though these wells are marginal we continue to produce them and will continue as long as we are able to. The current regulations, if passed, will be the death of our wells and hundreds just like them. Our local refinery in Bradford, PA currently operating on crude oil from marginal wells just like ours will also be in jeopardy if, independent producers, like ourselves are forced to shut down our small operations.

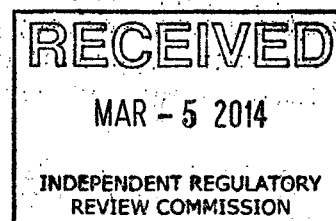
The local economies of Northwestern PA will also feel the effects if traditional wells are forced to shut down. Every operator purchases tools, supplies, fuel, and vehicles from local businesses. Not to mention the various service companies that provide drilling and completion services for new wells. Thousands of people each day continue to work for and do business with independent producers of shallow oil and gas wells. If Act 13 and the changes in place for Act 78 are passed these people will lose their income and be without work.

I urge you, to please consider the effects of your up and coming vote. Shallow oil and gas wells have populated the state for many of years, and they are the life blood of thousands of people in the state. Keep shallow traditional wells separate from the non-conventional wells; this is the only way we can continue to keep producing Pennsylvania Grade Crude Oil.

Sincerely,

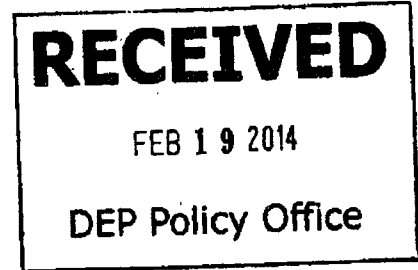
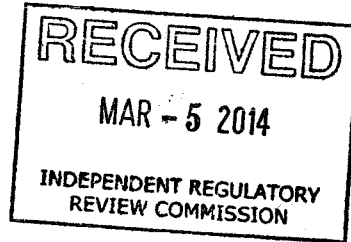
A handwritten signature in black ink, appearing to read "Brian M. Stiglitz".

Brian M. Stiglitz



526 First Street
DuBois PA 15801
January 21, 2014

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



Dear Board Member:

I am writing commentary on the proposed legislation regarding for environmental protection performance standards associated with oil and gas activities in Pennsylvania known as Chapter 78 of the Pennsylvania Code. Act 13.

I am concerned as this legislation affects the rural areas the most, leaving those of us who live in these locations most vulnerable to the degradation of our land, water, and air quality. This legislation *and its enforcement* is critical to healthful living and sustained livability.

In order to ensure safety and viability I would recommend pre-drill testing and the restoration and replacement of contaminated water. With over 161 complaints about water contamination from 2008 to mid-year 2013, it is obvious that DEP's approach to letting the driller decide when, where, and how to conduct water quality tests is *not* working. The pre-drill data should be made public, protecting the homeowner rights. The DEP has been maligned for its stonewalling techniques, giving the appearance of protecting the drilling operators and their companies, especially when it comes to making violations public and the lack of fines enforced. The extent of the problem can be seen by accessing the Pennsylvania Alliance for Clean Water and Air's website and clicking on "List of the Harmed." Print that list off and you have 67 pages (!) of real life cases of people and animals who have suffered unnatural conditions as a result of fracking across the state. Further, operators need to restore contaminated drinking water to a quality that the Safe Drinking Water Act standards.

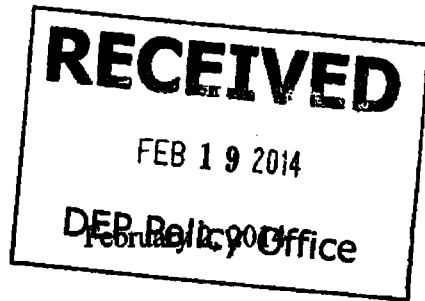
With laws that benefit both parties, i.e. the homeowner and the drillers, there can be positive economic gain without ecological consequences or health issues. I trust that testimony such as mine will be given serious consideration.

Thank you for your time and attention to a most important concern.

Respectfully,

A handwritten signature in black ink, appearing to read "Barb Emmer".

Barb Emmer



Dear Board Members,

My late husband's family has been in the oil business in northwestern Pennsylvania since the late eighteen hundreds. We no longer drill our own wells but lease our properties to local operators who love the oil business, appreciate the beauty of the forest, and adhere to environmental regulations. These operators have made me aware of the negative impact of the regulations being considered by the Board.

All of our wells are the shallow type and should not be regulated by standards set for deep drilling. Strict regulations are already in place and monitored by the U. S. Forest Service.

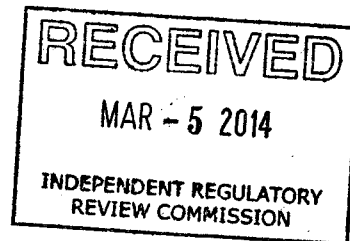
As a senior citizen, I depend on the income from the royalties I receive for everyday living expenses.

Please vote against these proposed regulations and allow shallow wells to operate under the regulations in place before the passage of Act 13 of 2012.

Sincerely,

A handwritten signature in cursive script that reads "Elaine B. Cochran".

Elaine B. Cochran



A handwritten address in cursive script: "Elaine B. Cochran", "111 Hamlet Hill Rd. #812", "Baltimore, MD 21210".

2855 Windmill Road
Fairmount City, PA 16224
February 7, 2014

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

Dear Board Members:

We have shallow, conventional wells in our area of Clarion County, Pennsylvania. We are writing to express our opposition to the passage of these regulations.

Farmers living in this area depend on these wells to help maintain their farms. We heat our homes, our tenant houses and our workshops. The gas is used to dry our grains, heat buildings for our poultry business, sheep and lambs and dairy business. It is our survival.

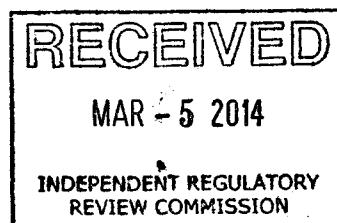
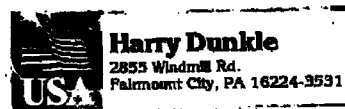
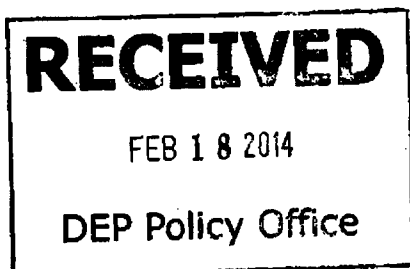
In regards to water, there has never been any problems in this area.

Drilling and producing wells must not be regulated by the same set rules as deep shale unconventional wells. The regulation package as it now stands is overly broad and burdensome, without adding meaningful protection to the environment.

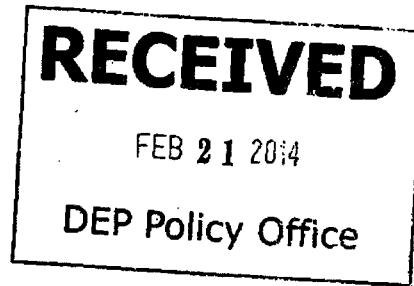
I urge you to vote NO to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

Sincerely,


Harry Dunkle



Lester C. Henry
1555 Route 208
Emlenton, Pa 16373
January 30, 2014



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

Dear Environmental Quality Board:

My name is Lester Henry and I own and have operated a small business for the past forty-five years. We have been providing sub-base for well sites and access roads for conventional oil and gas wells among other jobs.

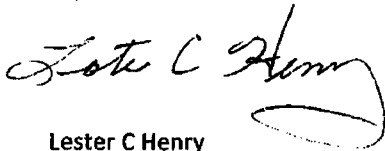
The profit margins in conventional oil and gas wells is low. As conventional oil and gas activity shrinks, our economy in our area is also hurt. I have been made aware of the proposal now before your committee that would change regulations affecting both conventional and unconventional wells.

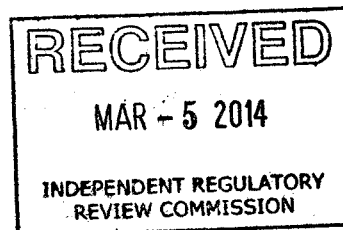
I am writing to urge you to vote "NO" on those regulations.

Shallow oil and gas has been produced in our area for over 150 years and has had no lasting detrimental effect on our environment. Putting these people out of business by imposing costly, unnecessary new regulations on them would also jeopardize my business and hurt our local economy. Before new regulations are imposed on a small business careful steps should be taken to make sure that the regulations are necessary.

Please vote "NO" to the proposed changes to Chapter 78 regulations so I can remain in business, thereby adding employment, as well as dollars, to the local economy.

Sincerely,


Lester C Henry



175 Marks Lane
Fairmount City, PA 16224
February 7, 2014

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

RECEIVED
MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Board Members:

I am writing concerning the proposed changes to the Oil and Gas Regulations, Chapter 78 - Sub Part C and the enactment of Act 13. We are located in Clarion County, Pennsylvania and have many shallow, conventional gas wells located in our area. I am writing to express our opposition to the passage of these regulations.

My understanding of the issue is that the new regulations were proposed to ensure the environmental safety of the Marcellus and Utica Shale "deep" well drilling process. In turn, these regulations are now also being applied to conventional "shallow" well drilling.

I own and operate a small farm on which there are two operating shallow gas wells. These wells provide gas to heat our home, shop and other buildings as well as give us a monthly royalty payment. The wells have helped made it possible for us to keep our farm operating in spite of rising costs of housing, equipment and other operating expenses.

The proposed regulations would severely impact any future drilling of shallow gas wells. The cost of the various requirements will not be recovered by potential return for the small companies drilling these wells. The potential return from the drilling of a "deep" unconventional well would easily cover the cost of the additional new regulations.

I urge you to vote NO to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

Sincerely,
Paul A. Stahlman
Paul A. Stahlman

RECEIVED
FEB 18 2014
DEP Policy Office

February 15, 2014

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



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. I am a consumer of natural gas at my residence, and I am concerned that the added burden of increased regulation and associated costs could significantly harm this industry while providing little or no added benefit to the environment.

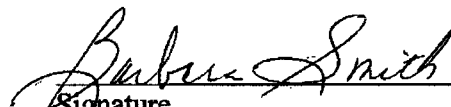
Shallow oil and gas wells have been drilled and operated around where we live for many years and their footprint on the environment has been minimal. From what I see, Pennsylvania's environment is in good hands with the oil and gas industry. Those employed in this industry live, work and play in the same areas where the oil and gas industry operates, and they all share a passion for protecting the Commonwealth's natural resources. It is obvious that they – like me – want to pass on the legacy of a clean, healthy environment to our children and grandchildren.

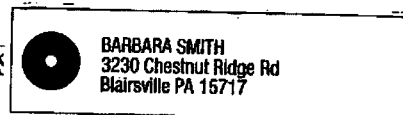
I understand that regulations are necessary and must be updated periodically to match current laws and industry best practices. At the same time, however, the costs of regulations cannot outweigh their benefits. It is obvious to me that the onset of Marcellus shale drilling has sparked these proposed changes, so why not concentrate on regulating that portion of the industry and leave the conventional industry as it currently is? 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 less oil and gas supply and will once again increase our dependence on other countries for our energy needs. Fewer oil and gas wells will also mean fewer jobs in the 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.

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



City, State & Zip Code

Ezra Wolfe

4621 Larchwood Ave Philadelphia PA 19148

RECEIVED

FEB 27 2014

DEP Policy Office

Date: 2/22/2014

Environmental Quality Board Members

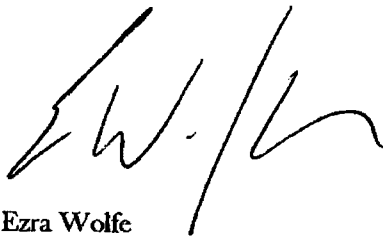
RE: Environmental Protection Performance
Standards at Oil and Gas Well Sites

P.O. Box 8477, Harrisburg, PA 17105-8477

Dear Members:

I am writing to ask that you prohibit open-air frack pits that could leak chemicals into groundwater and soil. Please require well operators to restore contaminated drinking water supplies to a safe standard and require comprehensive pre-drill testing of nearby water supplies.

Sincerely,



Ezra Wolfe

RECEIVED

MAR - 5 2014

INDEPENDENT REGULATORY
REVIEW COMMISSION

RECEIVED
FEB 21 2014
DEP Policy Office

David L. Palmerton Jr.
c/o GZA
7500 Brooktree Road
Wexford, PA 15090

January 27, 2014

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

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MAR - 5 2014
INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Board Members:

I work with many operators of shallow, conventional wells in Pennsylvania and have been made aware of the regulations currently being considered for approval by your board. I was personally one of those operators in the early 1980's. I am writing to express my opposition to the passage of those regulations as they now stand.

The current push by "anti-drilling" activists to advocate for stronger regulations that will stifle most if not all oil and gas production is just wrong. Little do these people realize the potential unintended consequences – higher costs for oil and gas and perhaps the loss of healthy supplies for their neighborhoods.

Shallow oil and gas wells have operated in this state for over 150 years and regulations currently governing those wells have been more than adequate to protect the environment while allowing producers to operate profitably through most of those years.

I can assure you that legacy wells that produce gallons of oil per day, or a small amount of MCF's of gas, will not be able to tolerate the cost of these additional regulations. This will result in more unemployment, loss of production vital to our local refinery, the reduction of our local tax base and

cause harm to all the local businesses that depend on the millions of dollars our production puts into the local economy. Also, forcing small producers out of business may add thousands of wells to the abandoned well list the state will be burdened with plugging.

Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. The regulation package as it now stands is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

I urge you to vote "NO" to these proposed regulations and allow conventional wells to operate under the effective regulations in place before the passage of Act 13 of 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "D. L. Palmerton Jr.", written in a cursive style.

David L. Palmerton Jr.

cc: Stephen Plants

Jason Kopanic

2 Kensington Court • West Newton, PA 15089
Phone: (724) 872-0192 • E-Mail: Jason.Kopanic@gmail.com

Date: February 24, 2014

Environmental Quality Board Members

Re: Environmental Protection Performance Standards at Oil & Gas Well Sites

P.O. Box 8477

Harrisburg, PA 17105-8477

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FEB 27 2014

DEP Policy Office

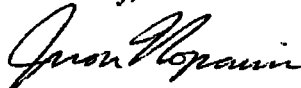
Dear Board Members:

I applaud your decision to update Chapter 78 of the PA Code issued under the Oil & Gas Act, but urge you to strengthen some of these critical protections. Now is the time to make serious changes to these policies:

- Prohibit the use of open-air frack pits/impoundments, and require a closed-loop system that utilizes above ground tanks for storage of wastewater;
- Mandate standardized baseline testing and make that information available to the public;
- Require drilling companies to identify existing wells before new well construction in order to prevent negative impacts on water supplies and the environment;
- Make companies plug and seal (or otherwise appropriately address) abandoned and orphaned wells according to state safety standards prior to new well site construction.

I appreciate your consideration of these rule changes, and your dedicated efforts to keep my family and all Pennsylvanians safe and healthy. I look forward to your response.

Sincerely,

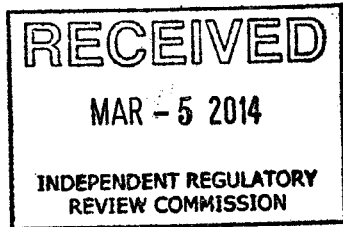


Jason Kopanic

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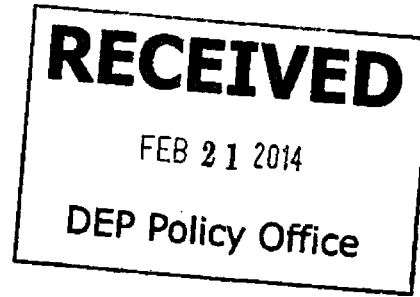
MAR - 5 2014

INDEPENDENT REGULATORY
REVIEW COMMISSION



1/25/2014

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



Hello, my name is Cheryl Thomas and I live in McKean County, PA. I submit the following as my testimony during the public comment period for the proposed revisions of Chapter 78 regulations.

I have pleaded with regulators and Jerry Brenan, the now deceased owner/operator for Norris Oil Co. to do something about the contaminants leaking out of the wells and related infrastructure as they fell further into disrepair over the past 24 years.

DER (now DEP) and EPA were informed numerous times over the years of how Mr. Brenan operated. His actions in conjunction with the lack of regulatory enforcement devalued my land. Mr. Brenan failed to use any management practices and operated out of regulatory guidelines on a regular basis over the past two decades.

Mr. Brenan regularly ignored and intentionally broke clean stream laws, dumping waste and other oil field associated fluids on my land and into Knapp Creek. In addition to the equipment that was in operation until Brenan's death, strewn across my land is over two decades of discarded Norris Oil Co. equipment, dismantled and tossed aside. As more of Norris Oil's equipment fell into disrepair, and the plumes of contamination grew, more acreage of our land became unusable because of the contamination.

The DER, DEP or EPA did nothing to prevent further damage.

I was told by several DER, DEP and EPA agents that "you will never see it in writing, but we were told to drop any further action against Mr. Brenan", allowing him to conduct his business of producing oil. "We can't put an old man out of business." Please check it out in the records from the 1989-1990 era of our reporting to DEP and EPA.

Now there is a form letter circulating in this area stating that "shallow oil producers leave a small footprint on the environment" is a load of CRAP!!

There are untold tons of contaminated soil on our land; contaminated with oil and brine. Many tons of equipment in various stages of disrepair including leaking oil storage tanks, power lines, pipelines and various equipment associated with oil production has been abandoned and also discarded over the past two decades. Equipment is strewn across many acres, in the creek and tangled in vegetation.

I contacted Susan Ghoweri from the DEP's orphan and abandoned well plugging program and I tried to describe the magnitude of the destruction and requested that she visit the site. I have yet to received a response to my invitation I sent **months** ago.

A spokesman for DEP, Kevin Sunday, released a statement to the local newspaper regarding the contamination of my property which downplayed the extent of the (ongoing) contamination, alleging the total amount spilled was merely "10 gallons" total. Not only was he (Kevin Sunday) unqualified because ha has not been to the site, no one from the DEP can make a qualified estimate of the amount of oil and contaminants entering the watershed yearly.....NO ONE has done a study. I find this blatant mischaracterization totally offensive! The release surpassed the 10 gallons in one day recently when the separator tank reported to both DEP and EPA leaked the

entire fluid contents into the Allegany watershed.

This is an atrocity and the agency charged with the responsibility to provide oversight regulations has proven to be negligent, derelict of it's duties to protect the environment, and unqualified. Oil continues to flow from this facility and into the watershed daily, and large areas of our land continue to be contaminated and devalued.

The regulations conventional, independent oil producers need to be strengthened. Judging from the damage to our land; the current regulations fail to protect surface owner's rights, property and the environment.

After conventional well regulations are strengthened, qualified inspectors who are willing to enforce the regulations need to be hired so surface owner's civil liberties are not trampled on by rogue conventional oil producers, while regulators look the other way for decades.

For over a century operators have been drilling wells, making money, raping the land and leaving unplugged, leaking wells in their wake.

Oil is contaminating our land and our well water contains potentially explosive levels of methane. There are days when we have inversions, the air is heavily laden with the smell of crude. It smells like if you lit a match, the air would catch fire. At those times, we have to stay indoors.

Please visit the following links to see photos of our property, yard and also information on our experience while we try to attain justice: http://www.cardcreek.com/Other/Duke-Center-Wells/28890531_sxPNqz#!1i=245649975&k=sQSFwXC

Spreadsheet with well location info, photo and map links:

<https://docs.google.com/spreadsheets/ccc?key=0AqV75wo6lhJPdE92VTE4a1daeU51NEkzUGpFTDh6ekE&usp=sharing>

<https://www.facebook.com/pages/Duke-Center-PA-Historic-Wells/148967731950176>,

<http://saveourstreamspa.blogspot.com/2013/12/life-on-wrong-side-of-oil-field-tracks.html>.

Now, DEP is striking a deal for the estate to plug 7 out of 19 wells that were in the original order to plug, with 32 identified and marked wells. There is a map in the McKean County courthouse showing at least 65 wells. The remaining 12 will go on the DEP abandoned wells list for the taxpaying citizens of PA to foot the bill. ARE YOU KIDDING ME????!! What happened to the enforcement of the law stating if the well hasn't been produced for 365 days, it will be plugged???? This producer did in fact produce at least 10 oil wells on my land at the time of our purchasing this land. He also operated a "water plant" and an unknown number of enhanced recovery wells well into the mid 1990's. I can't say what others he produced prior to our purchase of this parcel of land. If the producer/operator can't pay for clean-up, take the land and personal property holdings of the producer/operator. Don't let the responsible party get off with only a token clean-up and saddle the taxpaying populace to finish the job at some nebulous, undetermined time in the future.

This "negotiation" is one more example of why regulations for conventional operators need to be strengthened. We need to do better than this!

Tons of equipment including broken down wooden oil storage tanks are in need of proper disposal. These need to be hauled to a hazardous waste facility for proper disposal. The deal may relieve the estate of this expense also. And what about remediation of contaminated soil??

The DEP doesn't seem to have a department that addresses hazardous waste associated with abandoned oil facility removal. It appears the DEP isn't taking this into account; this is a very

legitimate grievance.

These operational practices may have been acceptable and the norm in the past 150 years, but we need to start protecting the environment, water resources, surface owner's rights and more importantly limited public resources. Citizens and state agencies should not be burdened with these expenses. This "negotiation" is an absolute regulatory failure the very fact the DEP will negotiate a deal allowing the estate to walk away may also undermine any claims for restitution we may be entitled to for the extensive damages to our property should we choose to pursue remediation through legal channels.

We thought the greatest harm was suffered during our two decade long ordeal of neglect from the owner/operator and the DEP and EPA, not if the producer/operator is let off cleaning up our land from the mess **he made**.

If the Commonwealth doesn't attempt to clean it up and recoup expenses from the estate holding the personal property of the producer/operator and they get away with only a token clean-up, why even bother revising regulations? The perception we have is that DEP doesn't enforce the regs, the agency sits back and allows operators to destroy others land, and then negotiate sweetheart deals with these operators.

My husband and I expected the regulations to be enforced, and when the operator passed away we had reasonable expectations the DEP would hold the estate responsible for the needed cleanup and remediation.

Thanks for your time, we would appreciate it if you contact us to follow up.

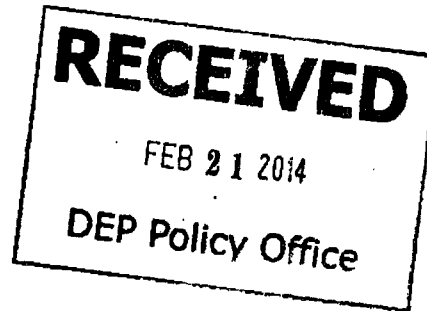
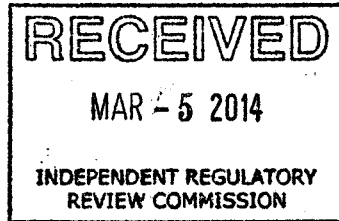
Cheryl Thomas



Joe Thomas



364 Oil Valley Rd.
Duke Center, PA 16729



January 20, 2014

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

RE: Environmental Protection Performance Standards for Oil & Gas Activities

Thank you for the opportunity to comment on making regulations stronger to protect our air, water & health. Updated regulations are vital to protect our Pennsylvania water resources, homes & our resources for future generations.

Please extend the public comment period for a minimum of 120 days & please hold more public comment hearings in affected counties. These regulations need updated because they are outdated & inadequate to protect our water resources.

Ensure regulations require "operators" test water supplies before, during & after drilling activities. Make sure "operators" restore contaminated drinking water to a quality that meets Safe Drinking Water standards no matter what the quality of the water prior to drilling. If the water quality was above Safe Drinking Water standards the "operator" should restore the water to that higher standard; otherwise, good water supplies will be degraded. Require drillers to use a consistent list of comprehensive parameters for pre-drill water testing & make all data available to the public. (Relates to Sections 78.51 & 78.52)

Prohibit "operators" from using open pits for storage of regulated substances & prohibit the onsite processing of shale drilling cuttings due to hazardous substances requiring analysis. Clearly define "freshwater" that is used in oil & gas operations, while being clear about use & disposal of polluted substances. (Relates to Sections 78.56, 78.57, 78.58 & 78.59)

Prohibit the burial or land application of drill cuttings. Prohibit the onsite burial of waste pits. Prohibit the use of brine for dust suppression, de-icing & road stabilization. Prohibit the land application of top hole, pit water, fill or dredged material. (Relates to Sections 78.60, 78.61, 78.62, 78.63 & 78.70)

Identify orphaned & abandoned gas & oil wells. Identify existing wells before site & well construction & drilling. Plug & seal or otherwise appropriately address abandoned & orphaned wells. Prohibit use of disposal injection wells in Pennsylvania due to the history of abandoned gas & oil wells. (Relates to Section 78.52a)

Sincerely,

Thomas C. Lewis

Public comment period on proposed oil and gas regulations opened

HARRISBURG, Pa. — The Department of Environmental Protection and the Environmental Quality Board has opened a public comment period for a proposed regulation for environmental protection performance standards associated with oil and gas activities.

The Environmental Quality Board is a 20-member independent board chaired by the secretary of DEP that adopts all of the department's regulations and considers petitions to change regulations.

During the public comment period, the EQB will be hosting seven public hearings across Pennsylvania and offer multiple ways to submit comments.

Along with the EQB hearings, DEP will hold two webinars — Dec. 19, from 2:30 p.m. to 3:30 p.m., and Jan. 3, from 9:30 to 10:30 a.m. — to present information and answer questions on the proposed regulation.

Details. The proposed regulation implements key provisions of Act 13 of 2012, including further consideration of impacts to public resources, such as parks and wildlife areas; the prevention of spills; the management of waste; and the restoration of well sites after drilling.

Additionally, the draft rulemaking also includes standards affecting the construction of gathering lines and temporary pipelines, and includes provisions for identifying and monitoring abandoned wells close to proposed well sites.

Public hearings. People wishing to present verbal testimony at a hearing are requested to contact the EQB at least one week in advance of the hearing to reserve a time. Those who wish to present testimony at the hearing may use the address below or call the EQB at 717-787-4526 to reserve time to testify.

Witnesses are limited to five minutes of testimony and are requested to submit three written copies of their testimony to the hearing chairperson at the hearing. Organizations are limited to designating one witness to present testimony on their behalf at each hearing.

Online comment. The public is being invited to submit comments to the EQB regarding the proposed rulemaking by Feb. 12. Along with their

Public hearings

The public hearings will be held at 6 p.m. Below are locations and dates.

- **Wyoming County**
Jan. 7, Tunkhannock High School Auditorium, 135 Tiger Drive, Tunkhannock.
- **Chester County**
Jan. 9, West Chester University of Pennsylvania's Sykes Student Union Theater, 110 W. Rosedale Ave., West Chester.
- **Lycoming County**
Jan. 13, Pennsylvania College of Technology's Klump Academic Center, One College Ave., Williamsport.
- **Crawford County**
Jan. 15, Meadville Area Senior High School Auditorium, 930 North St., Meadville.
- **Cumberland County**
Jan. 16, Good Hope Middle School Auditorium, 451 Skyport Road, Mechanicsburg.
- **Washington County**
Jan. 22, Washington and Jefferson College's Rossin Campus Center / Allen Ballroom, 60 S. Lincoln St., Washington.
- **Indiana County**
Jan. 23, Indiana University of Pennsylvania's Convention and Athletic Complex, 711 Pratt Drive, Indiana.

comments, people can submit a one-page summary of their comments to the EQB. Comments, including the one page summary, may be submitted to EQB by accessing the EQB's Online Public Comment System at www.ahs.dep.pa.gov/RegComments.

Written comments and summaries should be mailed to Environmental Quality Board, P.O. Box 8477, Harrisburg, PA 17105-8477.

The summaries and a formal comment and response document will be distributed to the EQB and available publicly prior to the meeting when the final rulemaking will be considered.

People can also submit comments to RegComments@pa.gov.

Deadline. Online and email com-

ments must also be received by the EQB on or before Feb. 12. If an acknowledgement of comments submitted online or by email is not received by the sender within two business days, the comments should be re-sent to the EQB to ensure receipt.

For more information or to register for DEP's informational webinars, visit www.dep.state.pa.us, keyword: "Webinars." After registration, an email will be sent containing a link to the webinar. The webinar will be recorded and posted on the oil and gas webinars webpage for future viewing.

To view materials for the proposed regulation, visit www.dep.state.pa.us and click the "Proposed Oil and Gas Regulations" button.

January 6, 2014

Berks Gas Truth * Clean Water Action * Delaware Riverkeeper Network * Earthworks * Clean Air Council *
Damascus Citizens for Sustainability, Inc * Sierra Club, Pennsylvania Chapter

Proposed changes to Pennsylvania's oil and gas regulations

Key concerns and talking points

In mid-December, the Department of Environmental Protection (DEP) issued proposed changes to the state's oil and gas regulations, known as Chapter 78 of the Pennsylvania Code. Act 13, the oil and gas law passed in 2012, requires DEP to make these changes. They are also necessary because regulations for conventional drilling are outdated and inadequate given the large amount of land and water used and waste and pollution produced in shale gas development.

Public participation is essential to making regulations stronger and more protective of air, water, and health! You have until February 12 to submit written comments or testify at hearings. You can use the analysis and talking points below (which cover key parts of the regulations) to prepare your comments. The regulations and public comment information are at:

www.portal.state.pa.us/portal/server.pt/community/public_resources/20303/surface_regulations/1587188

FIRST please state that the public comment period should be expanded to 120 days minimum and more hearings should be set in affected counties. This is an important and far-reaching rulemaking and more time is needed for people to participate in a meaningful way. 59 Pennsylvania organizations and thousands of people have signed a petition calling for more time.

1. Pre-drill water testing and the restoration and replacement of contaminated water supplies (Sections 78.51 and 78.52). We learned through DEP's determination letters that natural gas drilling operations have impacted at least 161 water supplies statewide. The natural gas industry has fought to have water restored to only pre-contamination conditions—even if it is not safe to drink. In addition, DEP leaves it up to the driller to decide when, where, and how to conduct water quality tests before drilling starts. DEP should require:

Operators to restore contaminated drinking water to a quality that meets Safe Drinking Water Act standards. no matter what the quality of the water prior to drilling. If the quality of a water supply prior to drilling was above these standards, the operator must restore the water to that higher standard; otherwise, good water supplies will be degraded.

All drillers to use a consistent list of parameters for pre-drill water testing, which DEP must establish before the proposed regulatory changes are adopted. The parameters should be as comprehensive as possible, but at a minimum match what DEP uses when it conducts full contamination investigations and to ensure that complete baseline data is available.

All drillers make pre-drill data available to the public, while protecting individual homeowners' privacy, through an online platform, which DEP must establish before the proposed regulatory changes are adopted.

2. Standards for frack pits and impoundments (Sections 78.56, 78.57, 78.58, and 78.59). Mounting violations and the potential for water and air pollution have already led some companies to transition away from pits and standardize the use of closed loop systems which utilize tanks to store wastewater. DEP should:

Prohibit operators from using open pits for storage of regulated substances, including wastewater, drill cuttings, and substances (like gels and cement) that return to the surface after fracking. Many spills, leaks, and other problems involving pits have occurred statewide that contaminate water, soil and air. Waste should be stored only in closed systems.

January 6, 2014

Prohibit the onsite processing of shale drill cuttings, which often contain hazardous substances and radioactive materials and require thorough analysis and special handling.

Define "freshwater" that is used in oil & gas operations. Water leftover from fracking and contaminated fluids being recycled for fracking (such as from mining or sewage) is often mixed with clean water for additional operations. The lack of a clear definition allows operators to avoid regulations on the use and disposal of polluted substances.

3. Disposal of brine, drill cuttings, and residual waste (Sections 78.60, 78.61, 78.62, and 78.63, and 78.70) Operators currently escape the strict federal regulation of hazardous substances that other industries have to follow. Yet drilling and fracking generate large amounts of solid and liquid waste that can harm water supplies, air quality, land, health, and wildlife. Pennsylvania should apply U.S. Resource Recovery and Conservation Act standards to regulate all aspects of the storage, transport, and use of hazardous materials contained in pits, centralized impoundments, and tanks. In addition, DEP's proposed Chapter 78 changes don't address the risks posed by hazardous waste and do little to improve current regulations or ensure safe disposal. DEP should:

Prohibit the burial or land application of drill cuttings, which can contain polluting and radioactive substances. DEP proposes different conditions for disposal of drill cuttings from above and below the well casing, but neither makes the practice safe. Cuttings from deep underground may contain more pollutants, but chemical additives and contaminated fluids are also found in drill cuttings from shallower areas.

Prohibit the onsite burial of waste pits. Buried pits can leak and pollute groundwater over time, yet burial allows operators to walk away from any responsibility after completing operations.

Prohibit the use of brine for dust suppression, de-icing, and road stabilization. Stormwater runoff carries brine into nearby waterways and wetlands. Not allowing the use of brine from shale gas wells is a positive step, but brine from conventional wells can also push salinity loads far above any naturally occurring conditions.

Prohibit the land application of topsoil water, pit water, fill, or dredged material. These substances can contain chemicals and sediments bound with pollutants that pose risks to water, air and soil.

4. Identification of orphaned and abandoned gas and oil wells (Section 78.52(a)). This is an important change and should be supported. About 200,000 abandoned wells exist statewide. As drilling spreads and intensifies, so does the chance of accidents, blowouts, and pollution from the intersection of new wells with old ones. DEP should expand these changes and require operators to:

Identify existing wells before site and well construction and drilling (not just fracking), so that the location of a new well can be changed if needed.

Plug and seal or otherwise appropriately address abandoned and orphaned wells according to state safety standards *prior* to well site construction. The state lacks funding to address the large number of old wells, so drillers should be responsible for preventing pollution of adjacent water wells and air pollution from accidents when they occur.

Mr. Thomas C. Lewis
1191 Keystone Rd.
Brockport, PA 15823-1317

Policy
Fyi

DEP

February 9, 2014

GOVERNOR CORBETT: THIS IS A COPY OF A LETTER I SENT THE EQB. HOWEVER, IT IS MORE APPROPRIATE FOR YOU:

To: Pennsylvania Environmental Quality Board,

Regarding your efforts to improve regulations, I have this to say. Pennsylvania is my home state. I was born and raised there, graduated from college there, hiked, took many photographs, swam, and canoed there. Both of my sons graduated from college there. Many family members continue to live in Pennsylvania.

You have allowed my beautiful home state to be destroyed. You have permitted a rogue industry to harm many human, animal, and plant lives. You have allowed the rape of Pennsylvania's forests, the contamination of its streams, the pollution of its air and crops. You have stood in allegiance with the oil and gas industry and turned a blind eye to those you swore to protect.

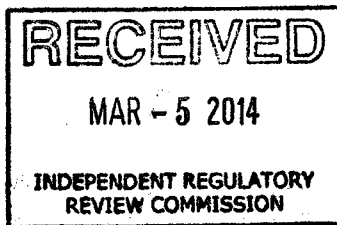
If the following ten parameters were met, I would say, drill on:

- 1) **If there were no other options.**
However you know that conservation, energy efficiency, and renewable await development.
- 2) **If the gas were not bound for foreign markets.**
However, you know it is. Realistic assessments say we have 12 years of natural gas supplies. These are needed for renewable infrastructure, not for shipping abroad.
- 3) **If it would not jeopardize our climate.**
Methane released from drilling and pipeline routes is 100 times more potent a greenhouse gas than CO₂ and threatens to engage feedback loops that end our ability to adjust to climate change. No regulations can stop the 6-8% initial well-casing leakage rate, increasing with age.
- 4) **If oil and gas industry tactics wouldn't require perpetual vigilance.**
Gag orders on those whose water is harmed, gag orders on doctors, midnight dumping, thousands of violations do not bode well for this industry.
- 5) **If Pennsylvania were not a beautiful state to visit.**
Travelers don't wish to share the roads with thousands of heavy trucks; nor do they want to refresh their spirits in an industrialized landscape.
- 6) **If there was a place to ditch its radioactive toxic waste.**
Ohio and New York are not proud to be Pennsylvania's dumping grounds for its frackwaste.
- 7) **If it would not come back economically to bite you.**
Already there are boarded-up restaurants and hotels in Pennsylvania and increased crime and there are no sustainable businesses rushing in to fill the gaps and pay the bills.
- 8) **If it would not harm air, water, or food.**
The "List of the Harmed" and increasing numbers of studies point to the life damage caused by toxic emissions from drill sites, compressor stations, and pipelines.
- 9) **If there were no residents or animals living there.**
Every square inch of the shale is required for unconventional drilling, accessed by thousands of drill sites and serviced by a web of pipelines and ancillary structures that do not serve life. Just as biocides are needed to kill life underground, people and animals are simply "in the way" of this extreme fossil fuel technology.
- 10) **If it did not undermine our democracy.**
Our elections have become a charade, as our representatives are paid to do the oil and gas industry's bidding.

Because none of the ten guidelines above can be met, I implore you to stop high-volume, unconventional drilling in my beautiful home state of Pennsylvania! No "performance standards" will suffice to protect the residents of the state.

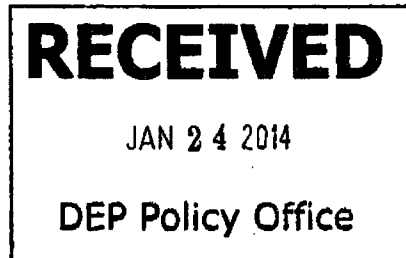
Gerri Wiley, RN, 19 Lake Street, Owego, NY 13827, gerriwiley@yahoo.com, 607-342-3159

RECEIVED
 MAR - 5 2014
 INDEPENDENT REGULATORY
 REVIEW COMMISSION



January 23, 2014

Dept. of Environmental Protection
Environmental Quality Board
Rachel Carson Office Bldg.
400 Market Street
Harrisburg, Pa 17101



Dear Board Members:

As a member of the Muncy Creek Watershed Association, I would like to comment here on some proposed changes to oil and gas regulations.

1) Please extend the comment period to 120 days to provide enough time for public review and input. More hearings are needed in many areas with extensive gas development.

2) You, DEP must set standards for pre-drill water testing, not the driller, and for restoration of any contaminated drinking water to the quality that at least meets Safe Drinking Water Act standards.

3) You must prohibit use of open pits to store waste water, drill cuttings and other regulated substances - all should be in closed systems. Do not allow burial of waste pits or use of brine on roads as all these actions can lead to contamination of water, soil and air.

4) You must strive to identify abandoned gas and oil wells and charge drillers with responsibility of preventing pollution of adjacent water wells.

Thank you for considering these and other rules that will protect the health and welfare of Pennsylvania residents. Marcellus shale development is needed to extend our energy supplies and I strongly support that, but it must be done with the utmost protection of our environment.

Sincerely yours,
Carol M. St. Clair
90 Main Street
Sonestown, PA 17758

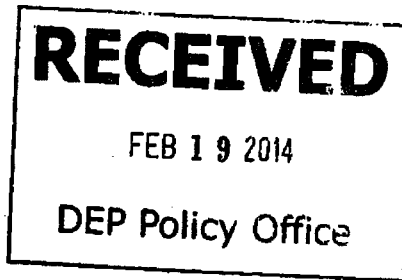
Carol M. St. Clair

February 7, 2014

Environmental Quality Board

P. O. Box 8477

Harrisburg, PA 17105-8477



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. I am a consumer of natural gas at my residence, and I am concerned that the added burden of increased regulation and associated costs could significantly harm this industry while providing little or no added benefit to the environment.

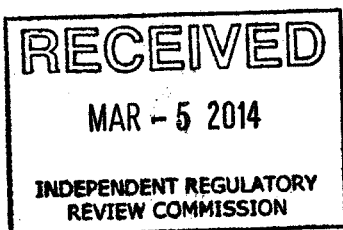
Shallow oil and gas wells have been drilled and operated around where we live for many years and their footprint on the environment has been minimal. From what I see, Pennsylvania's environment is in good hands with the oil and gas industry. Those employed in this industry live, work and play in the same areas where the oil and gas industry operates, and they all share a passion for protecting the Commonwealth's natural resources. It is obvious that they - like me - want to pass on the legacy of a clean, healthy environment to our children and grandchildren.

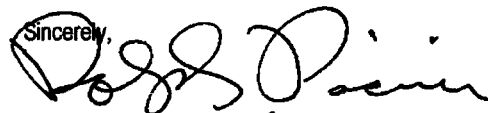
I understand that regulations are necessary and must be updated periodically to match current laws and industry best practices. At the same time, however, the costs of regulations cannot outweigh their benefits. It is obvious to me that onset of Marcellus shale drilling has sparked these proposed changes, so why not concentrate on regulating that portion of the industry and leave the conventional industry as it currently is? 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.

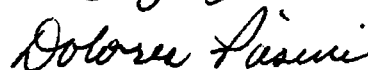
I am concerned that the result will be fewer oil and gas wells drilled which will mean less oil and gas supply and will once again increase our dependence on other countries for our energy needs. Fewer oil and gas wells will also mean fewer jobs in the industry and in the communities that support it, 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.

We have first-hand experience with the drilling and operation of shallow wells. The area drilled was left in pristine condition, much better than it was originally. We have had nothing but exemplary experience with the industry. Additionally, if you would like to visit our property for a tour of the site, we would be happy to accommodate you so that you can see for yourself the positive impact on the area drilled. Please feel free to call us at 412-384-6744 to schedule a tour.

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.



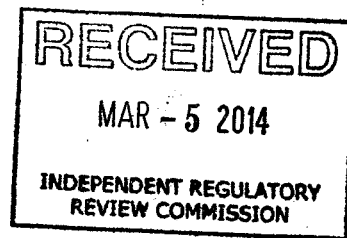
Sincerely,




Ralph Pasini and Dolores Pasini

2295 Sunnyside Hollow Road

Monongahela, Pennsylvania 15063



Lynn Allen
288 Dobson Road
Sugar Grove, PA 16350
814 489 7830

January 29, 2014

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



RE: Proposed new DEP regulations

Dear Board Members;

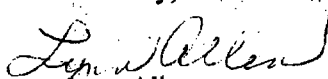
My husband and I are owners of two small businesses in Warren County. Our excavating contracting business, started in 1970, was built working with local conventional well operators. Now we rely more on our small shallow oil well business to provide our income and revenue to pay our employees through our excavating company which we contract to do the work on our small leases. **I am writing to ask you to vote "NO" to the proposed new regulations as they pertain to shallow, conventional oil wells in Pennsylvania.**

We own a home in Warren County where we live and work. This is a rural area and any kind of employment is highly valued to our economy. The two related businesses have not only supported employees, they have allowed us to be generous contributors to our community, church, local libraries, schools, local and national causes and needy individuals. We pay a lot of taxes in this county.

For the last ten years, the shallow, conventional wells have provided revenue to pay not only our vendors but continue to pay the employees. However, after reading the proposed regulations and looking into the accompanying costs, I can assure you that both businesses will be in serious jeopardy if the proposed regulations go into effect for conventional well operations.

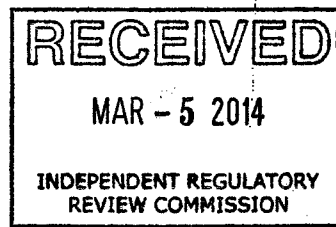
As a former teacher I can tell you that **one-size fits all does not work** with students or in the case of the conventional and non-conventional well operations. *If you brought your child to me for tutoring because he/she is falling behind in school and I diagnose that he/she requires remedial reading instruction, should I just teach him/her calculus, organic chemistry, the bassoon, literature and poetry during the same after school one hour session because that is what the senior curriculum includes? That child needs an individual approach? He/she may never need organic chemistry! The child simply needs to learn to read.* Much of the proposed regulations do not even apply to shallow, conventional wells. Certainly it is easy to see that placing the same regulations on a small, owner operator shallow oil production business will have a disastrous effect on small business in Pennsylvania. Small businesses located here and around the state, employ local people within Pennsylvania on a permanent basis, pay taxes, own property and generate prosperity here in our state. We have been the backbone of the American economy throughout our country's history. We simply cannot afford the overwhelming costs and time consuming regulations proposed. **PLEASE VOTE NO!!** It is disastrous for the State to treat small business owners like lower class citizens. Our contributions are as vital to local economies as the monied out of state companies.

Sincerely,


Lynn Allen

January 16, 2014

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



Dear Board Members:

I am a lifelong resident of western Pennsylvania, am a graduate of Norwin High School, and graduated with highest honors from California University of Pennsylvania. I have been working in the oil and gas industry for three years. I am writing because I want to see the delaying adoption of gas drilling regulations by companies and activist groups to *STOP*.

Natural gas is an efficient, effective and *CLEAN BURNING* energy - things that don't get spoken of very often. Natural gas is also allowing America to use more of their own resources instead of importing them from other countries.

I have personally seen lives *CHANGED* because of the oil and natural gas drilling in our region. I have seen third and fourth generation farmers who were in jeopardy of losing their family farm because they were not generating enough money, come back and flourish because of the signing bonuses and royalties they have received from natural gas leases and wells. Or a family who couldn't afford to heat their large old farm house because the gas bill was over \$800 per month in the winter, but because of the natural gas well they had and the free gas usage that was granted to them, because of that well, they were able to heat their home and keep their kids warm. You don't ever hear these types of stories in the media. The media blows everything out of proportion and uses scare tactics to make people, who

may not even have any interest or stake in the Marcellus drilling, scared to drink their tap water.

This career has changed my life, it's allowed me to meet many great people and help me get out of crippling debt I piled on while in college. I want more work in Pennsylvania and the way activists and lobbyists are acting, I don't know if that is going to happen! It is completely unfair to the residents of Pennsylvania who have the right to the oil and natural gas under their land, has anyone thought about the residents who actually want to lease their property and are unable to because of these activists' actions? Or about the leasehold owners in Wayne County, Pennsylvania who have had their leases revoked because of the moratorium put in place by the Delaware River Basin Commission?

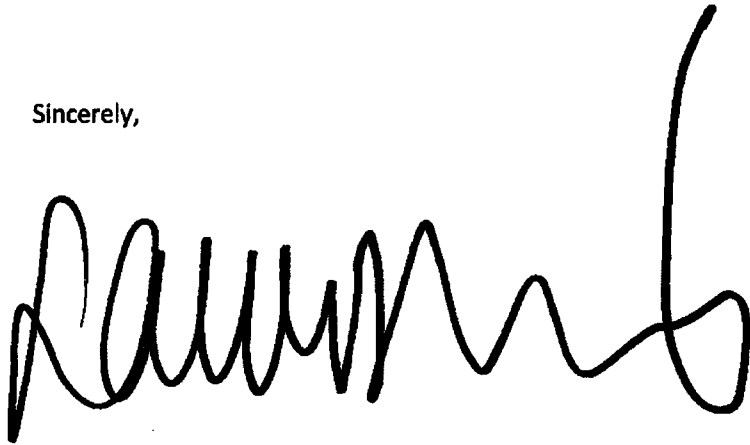
The safety of the land owner weighs very heavily on the minds of the oil and gas companies. For a lot of companies safety is *literally* their number one priority! Every safety precaution you can imagine is taken from the very beginning in seismic testing, the whole way to drilling and casing a well, and thereafter while the well is producing. I know water quality after hydraulic fracturing is a big topic of interest to residents and activists; extensive testing has been done and continues to be done to make sure the water is *SAFE*. The process of hydraulic fracturing takes place many many thousands of feet below the surface and the water supply.

The first commercial gas well in the nation was drilled in Murrysville in the 1870s-1880s. As I drive past a sign welcoming me to Murrysville, their sign says Murrysville - the location of the first commercial gas well - that seems like a town that is *PROUD*. Drilling in Pennsylvania has been going on for over 140

years; this isn't something that is going away. A lot of us in this field aren't just here for a week or two and then moving on to the next town. We live here; we put great amounts of money back into the local economy. I think that is a stigma of the business that I am in, people think 'oh you're just here to get my land, ruin it and then leave'. That couldn't be more *false*. I want to live in western PA for the rest of time, but if I don't get more work here, I will be forced to relocate and that goes for many people in this field. Think of all the money that will be taken from the local economy and spent elsewhere, if things don't change.

Please vote NO to adopting rules that would have consequences such as fewer oil and gas wells drilling – which in turn means fewer jobs and also less tax revenue for all levels of government.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Minnicks', with a large, stylized flourish extending upwards and to the right.

Lauren Minnicks

10210 Madison Ave.

North Huntingdon PA 15642

Joyce Naughton
150 Lafferty Hollow
Bradford Pa 16701

12/26/13

Re: Act 13 (2012)

To: Environmental Quality Board

Dear Sirs—

I am a Concerned Citizen (Not affiliated with the oil or gas industry).

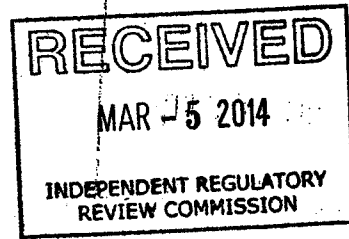
I am disgusted with the government regulation that comes "thick" and includes EVERYTHING.

I am opposed to the changes (Chapter 28 regulations) being considered by you.

Vote "No" on proposed changes to regulations as they apply to conventional oil & gas wells.

Instruct DEP to apply changes to deep wells only — Stop all this crap!

Joyce Naughton



Brian Best

2660 Nickleville Rd

Eminton PA 16373

1/24/14

RECEIVED

FEB 21 2014

DEP Policy Office

Environmental Quality Board

P.O. Box 8477

Harrisburg PA 17105-8477

RECEIVED

MAR - 5 2014

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Board Members,

I am an oil and gas producer of the shallow fields in Pennsylvania as well as an employee of a company that works in the unconventional fields of Pennsylvania, seeing first hand the variances between the 2 operations. I am writing to urge you to vote "NO" on the changes to the oil and gas regulations currently before your committee.

Shallow oil and gas has been produced in our area for over 150 years and has had no lasting detrimental effects on our environment. Putting these people out of business by imposing costly, unnecessary new regulations on us will jeopardize thousands of jobs, possibly my own, and hurt local economy.

IF you think it is necessary to impose new regulations on drillers and operators of deep, nonconventional wells, why weren't the new regulations written for just that purpose? Why were shallow producers and drillers included? Why can't they continue to operate under the current regulations, which have been very effective for years and years.

Please vote NO to the proposed change to Chapter 78 regulations so my job and thousands of other jobs that depend on these producers of shallow oil and gas, is not lost. If unconventional producers and drillers of shale plays in the region are in need of further regulations, please only adopt the new regulations for their operations and leave conventional operators to be as they have been for years and years.

Thank you for your time. Let our word be heard.

Sincerely,

Brian Busto