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INDEPENDENT REGULATORY
REVIEW COMMISSION

TLC Oil Operations, Inc.

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FEB 21 2014

DEP Policy Office

January 28, 2014

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

Dear Board Members:

I am the President and CEO of TLC Oil Operations, Inc., an operator of shallow, conventional wells in Pennsylvania. I 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 Commonwealth 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 shall producers out of business may add thousands of wells to the abandoned well list the Commonwealth will be burdened with plugging.

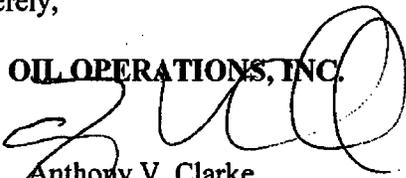
Drilling and producing conventional wells must not be regulated by the same set of rules as deep, shale unconventional wells. The regulation package as it now stands is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

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,

TLC OIL OPERATIONS, INC.

By


Anthony V. Clarke
President/CEO

AVC/pkb

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