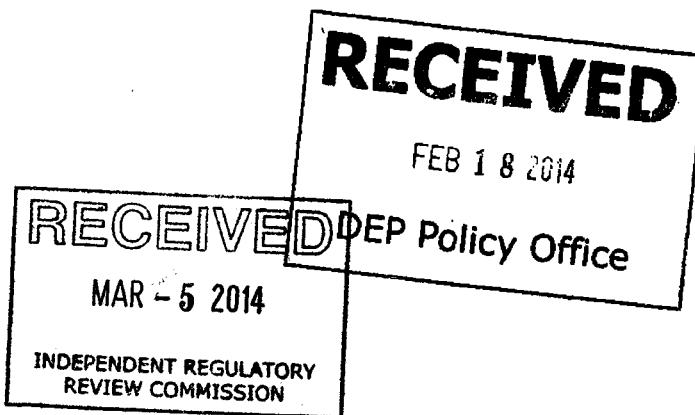


3042



Environmental Quality Board
Pennsylvania Department of Environmental Protection
PO Box 8477
Harrisburg, PA 17101-2301

Date: February 1, 2014

Re: Proposed amendments to 25 PA. CODE Chapter 78 (relating to oil and gas wells)

Dear Board Members:

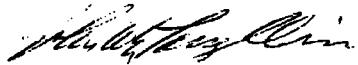
The Triple Divide Watershed Coalition (TDWC) is an alliance of public water suppliers, local governments, and residents within a watershed that encompasses Potter County and portions of Cameron and McKean counties. We are concerned that the current permitting process does not provide sufficient protection from potential adverse impacts from gas well drilling and associated activities on the recharge areas associated with our drinking water resources, due to the absence of mandatory notification of public water system operators.

Our members include public drinking water suppliers who have worked with DEP to develop Source Water Protection Areas. The intent of developing those Source Water Protection Areas is to prevent contamination of drinking water supplies by identifying these sources with scientific accuracy. The development of unconventional natural gas sources in Pennsylvania presents a significant and unique challenge. One of our member systems has already experienced significant damage from construction activities upstream from its surface water intake.

Some have observed that the new isolation distances proposed in the Chapter 78 regulations provide an increased degree of protection for our water supplies. However, we strongly urge you to consider utilizing specific recharge area delineations when they are available, rather than a generic setback distance, when requiring notification of public water system operators. The 3000 ft. setback, as proposed, should be utilized as a default in those cases when a specific delineation is not available. Enabling language could be included by inserting a new paragraph similar to Section 78.15 (d) or by adding the term "delineated source water protection areas" in Section 78.15 (e). All of our member systems, as well as many others, have delineations which were written by professional geologists and approved by DEP staff. These recharge areas are mapped in electronic format and could easily be included into the e-Facts system and referenced by DEP staff during the permit review process. If better science is available and accessible to assist in the protection of public drinking water sources through improved communications, why not use it?

On behalf of our members, the Triple Divide Watershed Coalition requests that the Department carefully consider Source Water Protection Areas during the permit review process for natural gas wells, pipelines, and appurtenant facilities.

Thank you for your consideration in this important issue.



John McLaughlin, Chairman, TDWC



Mr. John W. McLaughlin
286 A. Frame Rd.
Coudersport, PA 16915