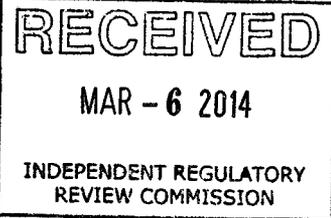


Catalyst Energy, Inc.

February 19, 2014

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

3047



To Whom It May Concern,

As an employee of Catalyst Energy, Inc., I am providing the following comments to the proposed revisions to Chapter 78 by the PA Department of Environmental Protection. Catalyst Energy, Inc. is an operator of conventional oil & gas wells in northwest Pennsylvania.

I am a supervisor of well construction and drilling activity and have specific insight into several proposed Chapter 78 changes.

The proposed 78.56 (10) states all pits must have a maximum side slope of 2:1. At my job, it is imperative that I work directly with land owners and their reasonable requests to minimize disturbance related to our activity. This proposed requirement is a slap in the face to any land owner who will have oil & gas activity on their property. It essentially takes away our ability to work with landowners to make sure they are satisfied with the disturbance they are faced with.

The proposed Section 78.57 (e) would require the removal of all underground or partially buried brine tanks. PADEP fails to realize that these underground tanks serve as a gravity drain from above ground oil tanks. If you force us to put these tanks at the same elevation as oil tanks, many more lines, fittings, and pumps would need to be in place to transfer brine. In the winter, these lines and pumps will freeze and pose a pollution hazard. Leaving tanks below ground is much less of a potential environmental hazard.

In general, the proposed Chapter 78 revisions appear to be geared towards unconventional development. I recommend separating Chapter 78 into two entities such that conventional and unconventional operations are governed separately. If this is not feasible, then I object to all proposed Chapter 78 changes. Please vote "no" to the proposed changes to Chapter 78.

As a side note, I also wish to point out the unfair attention oil & gas operators receive in terms of state road bonding. If we so much as cause a hairline crack in a state road we have bonded, we are issued a letter from PennDOT that demands the road is repaired to its original condition. On roads where there is no weight restriction, however, the state has no one to pay for its roads and they are left to deteriorate. If transportation funding mirrored the expectations PennDOT holds oil & gas companies to, our road quality would no longer be the joke of the nation.

Sincerely,

A handwritten signature in black ink that reads "michael CTZ".

Mike Taylor
Field Development Supervisor