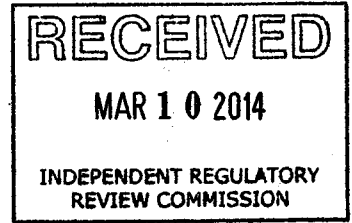


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**League of Women Voters of Pennsylvania
Public Comment to the
Environmental Quality Board
Regarding the
Proposed Oil and Gas Regulations
Troy, PA
February 10, 2014**

I am Barbara Clifford of 48 Prospect Street, Montrose, PA. I am speaking on behalf of the League of Women Voters of Susquehanna County and also the League of Women Voters of Pennsylvania.

We join with citizens throughout the Commonwealth who value our Constitutional rights to clean air, pure water, and the preservation of natural resources.¹ Based on our position, League members advocate for the use of best practices, comprehensive regulation, and adequate staffing across government agencies to provide the maximum protection of public health and the environment in all aspects of natural gas operations.²

In addressing the use of safety devices (78.72), we advocate that all phases of gas operations – not just those entitled control and disposal 78.55(b) use optimal protection to prevent blowouts. Safety devices should be consistent with best practices and be site-specific given the terrain and risks inherent in sensitive ecosystems [78.72 (i)]. Blowouts, such as those in Clearfield County (2010), the Tioga State Forest (2011), here in Bradford County (2011), and Wyoming County (2013),³ must not be repeated.

In regard to general provisions for well construction and operation (78.73), we applaud inclusion of the monitoring of orphaned wells during stimulation activities [78.73 (c)]. We recommend

¹ See Article 1, Section 27 of the Constitution of the Commonwealth of Pennsylvania.

² For details and resources see <http://www.palwv.org/Issues/Natural-Resources/Marcellus-Shale.asp> and <http://www.palwv.org/Issues/Natural-Resources/Pipelines.asp>

³ See http://triblive.com/x/pittsburghtrib/news/regional/s_684495.html - axzz2sPwPw9bJ and http://articles.philly.com/2011-01-26/business/27049596_1_talisman-energy-blowout-marcellus-shale and <http://online.wsj.com/news/articles/SB10001424052748704570704576275353686652670> and <http://thetimes-tribune.com/news/wyoming-county-well-malfunction-causes-spill-evacuation-1.1458575>

that on-going prevention mechanisms be in place to prevent pollution and to monitor operations throughout gas production given the high and often fluctuating pressures of flow [78.73 (c)]. Because of the contamination risks, notification of any changes to an orphaned or abandoned well to the Department should be reinforced by on-site inspection prior and during the plugging of an altered well. Further, any excess gas encountered during drilling should not be flared but captured to prevent degradation of air quality and unnecessary contributions to climate change exacerbated by methane.⁴

Section 78.75 speaks to alternative methods and materials for casing, plugging or equipping a well. Such requests should be approved on a case-by-case basis, employ only best practices, and include language that hold the operator legally and financially accountable for damages in perpetuity.

Clarifications regarding notification and inclusions of cited sections and acts are most helpful to encourage compliance both in the gas storage section (78.87), general provisions (78.91)(78.101), annual monitoring (78.103), and revocation of inactive status (78.105).

Specificity in reporting well production is very significant and should be posted for public review (78.121). Strict enforcement of these provisions is required given their implications for all stakeholders and revenue.

Although listing specific information to be included in a well-completion report and stimulation record is useful, we recommend the following:

- define “altering” a well [78.122 (a)];
- revert to the original language of “submit” a completion report not “arrange for the submission of” since this extends the timeline indefinitely. [78.122 (b)]
- include
 - “volume and/or mass” of each chemical additive [78.122(6)(ii)]
 - chemical formulas for each chemical intentionally added to the stimulation fluid [78.122(6)(iii)]
 - the mandatory addition of site-specific tracers with each stimulation record to establish liability in the event of unanticipated consequences.
 - test results of the specific chemical composition of all “base fluids” be they recycled, freshwater, or other water and their source(s) [78.122(6)(vii)] and
 - pressure readings measured 24 hours, 48 hours and 72 hours after completion (78.122(8)).

Finally, test results of the base fluid and a list of all chemical constituents of the chemical additives used to hydraulically fracture a well must be submitted to the Department and available to the public without regard to “protections afforded by trade secrets and confidential proprietary information.” [78.122 (d)]

Thank you for this opportunity to add input in this important process.

⁴ See “green completion” in <http://stateimpact.npr.org/texas/2013/09/16/how-much-methane-is-leaking-from-gas-drilling-new-study-aims-to-answer/>