

3042

Cooper, Kathy

**From:** RegComments@pa.gov  
**Sent:** Tuesday, March 11, 2014 10:16 AM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC; 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

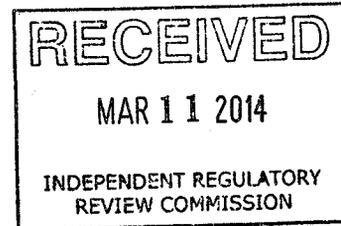


**Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites**

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

Commentor Information:

Christina Sporer  
 City of Oil City ([ocengr@oilcity.org](mailto:ocengr@oilcity.org))  
 Not Listed  
 Oil City, PA 16301 US



Comments entered:

EQB Hearing - Chapter 78 Oil and Gas Surface Activities - January 15 - Meadville PA - Testimony

These links provide access to the attachments provided as part of this comment. You are advised to save the attachments to your local computer or a network share when prompted by your browser.

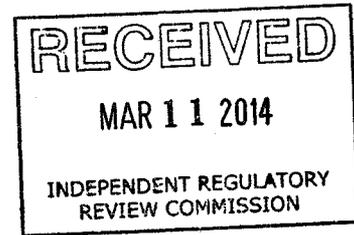
Comments Attachment: [Christina Sporer.pdf](#)

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

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Proposed Regulations for Oil and Gas Surface Activities  
Testimony at Public Hearing  
Meadville, PA  
January 15, 2014

My name is Christina Sporer. I am the City Engineer for the City of Oil City, Venango County. The City of Oil City owns and operates a public drinking water system which serves all residents of Oil City, as well as parts of neighboring Cranberry and Cornplanter Townships. The source of our drinking water is a well field, and the City is fortunate that it owns over 300 acres of the watershed, which at one time was thought to protect the source water from contamination. However, the area that actually needs protecting is now known to extend beyond the City's ownership onto privately owned land.

In 2010, the City participated in the Source Water Protection Technical Assistance Program sponsored by the Pennsylvania Department of Environmental Protection or DEP. DEP hired and paid a consultant, SSM Group of Reading, PA, to develop a Source Water Protection Plan for the City's well field. Part of that Plan was to determine the area from which the wells withdraw water; this is a challenging task since water flows through the ground in complex ways. SSM Group developed a computer model using the Groundwater Modeling System developed by the United States Department of Defense. This model is well-accepted among geologists and hydrogeologists, and is commonly used to help manage groundwater resources. The model required significant information about the study area – topography, geology, slopes, soils, infiltration rates, and water table elevations. SSM Group collected the necessary data for the model to estimate the recharge areas of the wells, and how long it takes water to travel through the subsurface to the wells. The model was then used to delineate protection Zones I, II, and III.

Zone I is the smallest of the three zones, encompassing a 400' radius around each well. Zone II is defined as the land that contributes groundwater to the wells in a ten-year time of travel, and is an area of 105 acres; it is irregular-shaped, not just a radius around each well, and it goes onto privately-owned land not under the City's control. Zone III is the remaining land that can contribute water to Zone II and ultimately reach the groundwater wells in more than ten years time of travel. Zone III for Oil City's wells occupies an area of 1.45 square miles, and is also irregular-shaped.

The State's oil and gas regulations **DO NOT** protect our drinking water sources. The regulations call for unconventional well developers to simply notify water purveyors when a proposed well is within 1,000 feet from a public water source – that's it! We can comment, and then DEP will make a decision. Why would the Commonwealth of Pennsylvania not use the information developed by source water protection plans throughout the State to **LIMIT** oil and gas well development? Allowing oil and gas wells within delineated drinking water protection zones doesn't make sense!

I have been told that private property owners have rights. Do they have the right to threaten contamination of a drinking water supply in existence since 1897 serving 15,000 people? How about setting up a State fund using impact fees for water suppliers to purchase mineral rights within our water protection zones?

I have been told that well drilling is very safe and the threat of contamination is very small. I say to you, is it worth the risk? According to DEP, **CLEAN, SAFE, and RELIABLE DRINKING WATER** is fundamental to the viability of any community, and as advanced as today's treatment technologies are, they are not perfect. Not all contaminants can be removed or treated – and it is often far more costly to treat contaminated water than prevent contamination from occurring in the first place. The oil and gas regulations completely contradict what DEP already knows.

Information from the State puts all the responsibility for source water protection on the water supplier. They tell us to perform baseline monitoring for contaminants, stay abreast of oil and gas development in the area, and have a collaborative dialogue with resource extraction companies. The regulations tell us what we can do after our water becomes polluted. All of this is a mockery to those of us who take the quality of our drinking water seriously – it is time for the Commonwealth of Pennsylvania to take a stand and be proactive in protecting our drinking water instead of passing the buck.

And finally, I want you all to know I am not against oil and gas development. Indeed, the new shale gas extraction methods offer a shining ray of hope in our dismal regional economy. Rather, I support the intelligent development of oil and gas resources while protecting existing resources that provide our citizens a good quality of life, and that includes our drinking water.

If the current drilling technology and methods are completely safe, is the Commonwealth of Pennsylvania willing to provide unlimited grant funding to cover the costs of clean-up and alternate supply of water associated with contamination of a municipal water supply resulting from oil or gas drilling? In other words, is the state willing to put its money where its mouth is?