

Cooper, Kathy

Form Letter UU

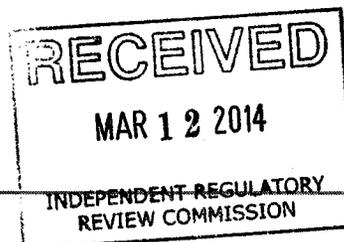
1-137

**From:** EP, RegComments <ra-epregcomments@pa.gov>  
**Sent:** Wednesday, March 12, 2014 3:05 PM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC; EP, RegComments; eregop@pahousegop.com; environmentalcommittee@pahouse.net  
**Cc:** EP, MS Development  
**Subject:** FW: Re: Comment on Proposed Regulations 25 Pa. Code Chapter 78 (Oil and Gas Wells)

Good Afternoon,

Below is an email form letter that DEP has received regarding the Proposed Rulemaking 7-484 - Chapter 78 Environmental Protection and Performance Standards at Oil and Gas Well Sites. **We have labeled this one "Focusing On a Few Key Areas"**. To date, we have received 137 emails of this form letter. Please note that the subject line of this email form letter and the "Sierra Club" email form letter are nearly identical but the email body is different.

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-----Original Message-----

**From:** Robert and Donna Janusko [mailto:b0ae49bf@opayq.com]  
**Sent:** Tuesday, March 11, 2014 2:29 PM  
**To:** EP, RegComments  
**Subject:** Re: Comment on Proposed Regulations 25 Pa. Code Chapter 78 (Oil and Gas Wells)

Dear Environmental Quality Board,

Thank you for the opportunity to submit comments to the Environmental Quality Board regarding revisions to Pennsylvania's oil and gas regulations.

I am very concerned because the proposed changes do not go far enough to control the damage our communities and environment are experiencing as the gas and oil industry develops its wells, frack pits, impoundments, pipelines, and other operations across the entire state. I support the tighter controls you are proposing in some areas, but they are too few and simply do not go far enough to stem the damage going forward.

I'm focusing on a few key areas for changes to the proposed revisions:

Sections 78.51 and .52: Pre-drilling water testing and the replacement and cleaning up of contaminated water supplies:

> Operators should be required to restore contaminated drinking water to a quality that meets Safe Drinking Water Act standards, no matter what the quality of the water prior to drilling. If the quality of a water supply prior to drilling was

above these standards, the operator must restore the water to that higher standard; otherwise, good water supplies will be degraded.

> All drillers should be required to use a consistent list of parameters for pre-drill water testing. The parameters should be as comprehensive as possible, but at a minimum match what DEP uses when it conducts full contamination investigations and to ensure that complete baseline data is available.

> All drillers must make pre-drill data available to the public, while protecting individual homeowners' privacy, through an online platform, which DEP must establish immediately.

Sections 78.56, .57, .58, .59: Open pits, impoundments and processing of drill cuttings:

> No open pits, or "frack pits" should be allowed on well sites; no hazardous substances should be allowed to be placed in pits.

> No onsite processing of drill cuttings; these cuttings can contain toxic and radioactive materials.

> No mixing and storage in open impoundments of "reused" or "recycled" water from fracking and drilling with clean water for use in additional operations; "freshwater" needs to be clearly defined so drillers can't avoid waste management requirements.

Sections 78.60, .61, .62, .63 and 78.70: Disposal of drill cuttings, brine, and residual waste:

> No burial in pits or land application of drill cuttings. Allowing waste to be left at well sites may be convenient for operators, but it risks water resources and creates a toxic legacy for the public to deal with. I don't want this hidden pollution buried in my community or on my land and near my drinking water.

> No spreading of brine or flowback for dust suppression, de-icing or road stabilization. Spreading these dangerous and often radioactive fluids on roads provides a pathway for pollution of our streams and groundwater and can harm wildlife and kill vegetation.

> No land application of tophole water, pit water, fill, or dredged

> material from drilling and

fracking. The chemicals and sediments in this material should not be allowed to pollute the air we breathe, the soil in which we grow food, and the water we drink.

Section 78.52(a): Orphaned and abandoned gas and oil wells:

> I agree with DEP that these wells should be identified. But they must be identified and plugged and sealed according to state safety standards before well site construction starts.

Operators must be required to avoid communication between new wells and old to prevent blowouts, accidents and well casing failure.

Please consider my input on these important regulatory changes. Thank you for your time and attention.

Sincerely,

Robert and Donna Janusko

1

Bethlehem, PA 18018

