

3042

RECEIVED  
IRRC



LEAGUE OF WOMEN VOTERS 2014 MAR 12 AM 4: 07  
OF PENNSYLVANIA  
226 Forster Street, Harrisburg, PA  
17102-3220  
717.234.1576

*Making Democracy Work®  
Grassroots leadership since 1920*

League of Women Voters of Pennsylvania  
Public Comment to the Environmental Quality Board  
Regarding the Proposed Oil and Gas Regulations  
Washington County, PA  
January 22, 2014

I am Judy Hughes, 1515 Yorktown Drive, Lawrence, PA. Tonight I am speaking for the League of Women Voters of Pennsylvania, a grassroots organization that promotes political responsibility and acts on selected issues such as natural gas operations in our Commonwealth. We thank you for providing this opportunity for informed civic participation.

Our advocacy is based on our statewide positions on natural gas extraction from Marcellus Shale and pipelines.<sup>1</sup> The League supports requiring 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 natural gas operations. We also act based on the Pennsylvania Constitution that provides each of us the right to clean air, pure water, and the preservation of our natural resources.<sup>2</sup>

This evening we address a portion of Section C Environmental Protection and Performance Standards beginning with Temporary Pipelines for Oil and Gas Operations (78.68b). We commend the Department for including these pipelines based on the results of our study in Lycoming County.<sup>3</sup> We recognize that pipelines are the safest way to transport hazardous liquids and gases if they are appropriately installed and monitored with adequate precautions taken. Strict accountability standards as well as monitoring and enforcement are needed by outside agencies – not the operators - relative to their construction and on-going maintenance. [78.68b (i)] We suggest the following changes:

---

<sup>1</sup> 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>

<sup>2</sup> See Article 1, Section 27 of the Constitution of the Commonwealth of Pennsylvania.

<sup>3</sup> See Pipelines in Pennsylvania: A Case Study of Lycoming County and its Technical Appendix found at <http://www.palwv.org/Issues/Natural-Resources/Pipelines.asp>

- Eliminate the word “temporary” as these lines may be in place for decades before the well site is restored due to multiple wells and multiple refrackings on a given site. [See Definitions. (78.1.)]
- Replace the words “to the extent practicable” with “to comply with “best practice at the time of installation” so that joints and couplings are not incorporated in the crossing of watercourses or ponds into which toxic substances might escape [78.68b (d)].
- Shut off valves should not only be installed on both sides of temporary crossings but also every 50 feet along the line to limit contamination in the event of a rupture. These locations must be included in an emergency response plan and monitored on an on-going basis to assure working order. [78.68b (d and e)]
- Discharge limits of 1000 barrels of fluid needed for a shut-off valve are too high – particularly in areas of exceptional quality and high quality streams. Because of varying pressures and the potentially highly toxic content in the lines, 100 barrels would provide greater protection for our waters. [78.68b (e)].
- Highly visible flagging every 75 feet or less must be supplemented with motion sensitive devices with light and/or sound to prevent damage by wildlife, off-road vehicles, cross country skiers, hunters, and others [78.68 (f)].
- Records of pressure testing and daily use must be available to DEP as well as repairs [78.68 (g)(h)(i)(j)].
- Monitoring of the contents must be done to assure the public that flammable materials – even when mixed with other fluids - are not being transported through temporary pipelines [78.68(k)].
- Restoration must be completed to the highest standards to the original state to mitigate degradation and prevent changes in the hydrogeology over the long-term [78.68 (l)]. And finally,
- the location and contents of fluids transported through the pipelines as well as timelines for use must not only be provided to the Department on request, but automatically to all emergency responders in the area and County Conservation District personnel. [78.68(m)].

At this time, our studies indicate that pipelines will have a far greater impact on our environment than previously assumed. Thus, we urge your thoughtful consideration and thank you.