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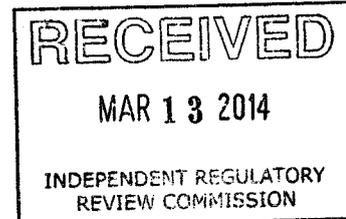
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March 10, 2014

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



RE: Proposed Amendments to 25 PA Code Chapter 78

Dear Members of the Board,

Catawissa Borough Council strongly believes in the protection of Pennsylvania's vital drinking water resources. The broadening development of the oil and gas industry may expose our water sources to multiple avenues for contamination if the proper safeguards are not put into place. While the proposed amendments enact source water risk-reduction regulations, there is room to further strengthen these amendments by utilizing the information collected in Source Water Protection Plans (SWPPs).

Many water systems in the Commonwealth, through a DEP Sponsored program, have had Source Water Protection Zones (SWPZs) determined during the development of their SWPZs. These Zones and Plans were developed by professional geologists and approved by DEP. The delineations of SWPZs has been instrumental in improving a water system's awareness to the extent of their source water's vulnerability to contamination. Now that these Zones have been established, water systems, Source Water Protection Committees and Coalitions, that have taken on the task of protecting source waters, know the actual sensitive, invaluable areas that need to be safeguarded from potential sources of contamination.

The next logical step would be for DEP to recognize the SWPZs, when they are available, instead of the blanket set-back distance, during the permit review process. Utilizing the SWPZs will save the Department time by identifying the water systems in the proposed permit area and to what extent the proposed activity would extend into, and thereby impact each system's vital recharge area. Additionally, proposed activity would extend into, and thereby impact each system's vital recharge area. Additionally, the Zones are readily available in electronic format and could easily be included in the e-Facts system.

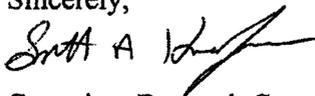
Another area the SWPZs should be utilized is in DEP's review of any plans for spreading brine on paved and unpaved roads. The proposed regulation already requires the applicant to include the roads to be treated, so again, it would be a simple process to cross-reference with the SWPZs. If any of the roads are in the SWPZ, the affiliated water system should be notified and provided

with a copy of the brine's chemical analysis. The water system should also be given the opportunity to submit a comment to DEP to be considered during the Department's review of the plan.

Whenever possible, DEP should be allowed to assist water systems, Source Water Protection Committees and Coalitions in their endeavors to protect these Zones that have been deemed vital, in essence by DEP, in preventing the contamination of drinking water sources. The proposed amendments to Chapter 78 presents an opportunity to formalize this assistance.

Therefore, Catawissa Borough Council respectfully requests that the Board considers these comments for DEP to recognize and utilize SWPZs during the review of oil and gas permits and brine application plans, in order to protect vital drinking water sources.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott A. Keefer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Catawissa Borough Council  
Scott A. Keefer, President