

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Thursday, March 13, 2014 2:35 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRRC; 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:

Duane Nichols
 Mon Valley Clean Air Coalition (duane330@aol.com)
 330 Dream Catcher Circle
 Morgantown, WV 26508 US



Comments entered:

THE DISTANCES BELOW, AND ALL DISTANCES FOR NOTIFICATION OR SET BACK DISTANCES NEED TO BE ONE HALF MILE TO TWO MILES, GIVEN THE EXPERIENCE FROM THE EXPLOSION AND FIRE AT THE CHEVRON WELL PAD IN GREENE COUNTY THIS YEAR. ALSO, THE HEAT, LIGHT, AND FUMES COVER THESE GREATER DISTANCES FROM FLARES. THE DIESEL TRUCKS HAVE NOW BEEN SHOWN TO BE THE PRIMARY SOURCE OF AIR POLLUTION PROBLEMS FROM DRILLING AND HYDRO-FRACKING.

FUMES FROM HOLDING PONDS ALSO POLLUTE THE NEIGHBORHOOD. SO, NO PONDS SHOULD BE ALLOWED. OR, THIS SHOULD BE COVERED WITH A FUME CONTROL SYSTEM.

"An applicant for a well permit will be required to notify the appropriate public resource agency (such as the Department of Conservation and Natural Resources or Pennsylvania Game Commission) if a well site is within:

- • 200 feet of a publicly owned park, forest, game land or wild life area;
- • In or within the corridor of a state or national scenic river;
- • Within 200 feet of a national natural landmark;
- • In a location that will impact other critical communities (species of special concern);
- • Within 200 feet of a historical or archaeological site listed on the Federal or State list of historic places;

or

- • Within 1,000 feet of a water well, surface water intake, reservoir or other water supply extraction point used by a water purveyor (unconventional wells only)."

NOTE: THE DISTANCES ABOVE ARE NOT ADEQUATE TO SERVE THE PUBLIC INTEREST.

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Cooper, Kathy

From: RegComments@pa.gov
Sent: Thursday, March 13, 2014 1:32 PM
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:

David Mahan
 (dmahan@dallas-morris.com)
 660 Minard Run Rd
 Bradford, PA 16701 US



Comments entered:

Mar 13, 2014
 660 Minard Run Rd
 Bradford, PA 16701

My name is David G. Mahan. I reside in Bradford, PA, and I employed by Dallas Energy and related companies, who produce oil and gas in PA and NY, and also provide contract drilling and well completion services in PA and throughout the Appalachian Basin.

I have approximately 33 years experience in the oil and gas industry. However, despite that background, I comment here as a concerned citizen, rather than as a representative of the oil and gas industry. This is because I own no interests in conventional oil and gas properties or wells, I have no direct investments in the conventional oil and gas industry, none of my children or near relatives are employed in the industry, and please note that I am near retirement age, so my personal financial situation does not depend on the health of the conventional industry. (In the interest of full disclosure, I do own a fractional OGM interest in a small, unleased recreational property in Crawford County, PA, that is marginally prospective for Utica Shale development, not likely to occur in my lifetime.)

It is my hope that the proposed regulations that are the topic of this comment will be withdrawn with respect to the conventional industry for two simple, yet vital reasons:

1. In order protect the economic interests of the hard-working owners, management, and employees of the industry.
2. To uphold the rule of law that is under assault in this country by progressive elements that are hostile to the concept of individual freedom and self-determination.

With respect to the economic interests: Raising the costs of developing and operating

conventional oil and gas wells will cause many wells to not be drilled and will lead to the premature plugging and abandonment of many existing wells, this at a time when it is ever more apparent that every barrel of oil and cubic foot of natural gas is vital to our national security and to our economic prosperity. The seismic-scale ripple effect of crippling this industry will be felt in the homes, shops, offices and other businesses throughout the small communities of the conventional industry.

A case could be made that this would, nevertheless, be necessary if there was abundant evidence that the modern conventional industry was wreaking environmental havoc on these very communities. But there is no such evidence; indeed, many operators voluntarily plug the abandoned wells of previous generations at their own cost (and liability, I suspect) in order to re-develop an area.

The DEP has the resources, the data, and the man-power to determine that there is no need for the proposed regulatory over-kill, but apparently has not brought these resource to bear to arrive at an efficacious solution to avoid applying a one-size-fits-all solution, to a problem that does not exist.

With respect to the rule of law: The vast majority of the businesses operating in the conventional industry are by definition small businesses. It is enough to simply state that the Regulatory Reform Act, requiring such regulations to be reviewed in the light of their effect on small business, has been ignored. This is not acceptable to a populace whose elected officials have passed that Regulatory Reform Act into law, with the expectation that it will protect our vital economic interests from the regulatory excess evident in these regulations before us. To ignore the Regulatory Reform Act is to dis-enfranchise those who provide the resources to fund state agencies and other state government entities.

Thank you for the opportunity to comment.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

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