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Cooper, Kathy

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MAR 14 2014

**From:** RegComments@pa.gov  
**Sent:** Friday, March 14, 2014 2:40 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

INDEPENDENT REGULATORY  
REVIEW COMMISSION



**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:**

Alison Rupert  
([amrupert@windstream.net](mailto:amrupert@windstream.net))  
568 South Frymire Hollow Road  
Hughesville, PA 17737 US

**Comments entered:**

1. All gas drilling activities in PA should be required to comply with U.S. Resource Recovery and Conservation Act standards (regulating hazardous materials).
2. All gas drilling activities in PA should be required to comply with the EPA's Natural Gas STAR Program (best practices for reducing methane emissions). See website: [www.epa.gov/gasstar](http://www.epa.gov/gasstar)
3. Permanent 24-hour air monitors should be required at all multiple-compressor stations, with real-time readings accessible online 24/7 to the public.
4. All drilling operations should be pitless, utilizing closed loop systems.
5. No residual waste of any kind should be allowed to be disposed of or buried at the drill site, including used pit liners, which should also be disposed of in certified landfills, or recycled.
6. Pipeline regulations and inspections should be applied universally, and so-called "high impact" or "low-impact area designations should be eliminated.

No attachments were included as part of this comment.

Please contact me if you have any questions.

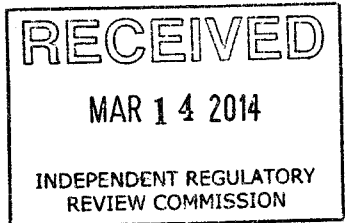
Sincerely,  
Hayley Book



3042

Comments at EQB Public Hearing on Proposed Changes to Chapter 78 Regulations  
Troy, PA  
February 10, 2014

Shellie Northrop  
124 Frances Street  
Sayre, PA 18840



Good Evening. My name is Shellie Northrop, and I'm from Sayre in Bradford County PA. I will make a few comments tonight on the proposed changes to Chapter 78 Regulations but intend to submit more complete comments before the March 14 deadline.

First, I would like to point out that regulations will not accomplish their protective goals unless there is good enforcement of the regulations. This must be done by levying fines high enough to act as a deterrent. Otherwise, there will be "bad actors" making the same mistakes and repeated violations over and over again. I would also like to point out the current proposed state budget will cut staffing at the DEP, not reassuring for an agency responsible for protecting the health of Pennsylvania citizens and preserving its environment.

It also cannot be stressed too much regarding Pennsylvania's dubious legacy of promoting resource extraction over the well being of current and future generations. It took a century for forests to re-establish after the clear cutting by the timber industry. And we are still dealing with the aftermath of coal mining with acid mine drainage polluting our waters. While job creation is repeatedly stressed, the numbers quoted by the industry are highly inflated compared to the Pennsylvania Department of Labor and Industry's own figures. A study by the Multi State Shale Research Collaborative shows this industry accounts for less than 0.5% of statewide employment. In heavily drilled Bradford County, it still accounts for just 6% of total employment. And these jobs are already going "bust." No industry should ever be given priority over the protection of health and environment for short term economic gains.

There should be changes and additions to the definitions used in this chapter. Specifically, there should be a definition of "fresh water" such that it is distinguished from fluids that are "other Department approved sources," such as mine water, that have been recycled and diluted with clean water (78.1(a)). There should be a definition for "seasonal high groundwater table," since this term is used in the regulations. The term of "oil and gas operations" should be used consistently throughout the regulations rather than "oil and gas activities," to be sure all the activities included in the definition for operations are covered.

Under 78.15(f) (1) and (2), Application Requirements, both the DEP and the applicant should be required to comment or respond to any comments received from public resource agencies if a permit may affect a public resource. The DEP should frame its response as conditions to mitigate the impacts rather than giving priority to the mineral rights owner's ability to "optimally" develop his rights. To not do so will be a failure of

the DEP to perform its duty to protect the public's constitutional right to a clean environment and protection of resources for future generations.

Under 78.51 Protection of Water Supplies, a "restored or replaced" water supply should meet PA Safe Drinking Water Act standards, despite industry lobbying for otherwise. And it should certainly match the quality of water prior if it exceeded those standards (78.51(2)).

The pre-drilling or pre-alteration survey (78.52) should have consistent parameters for testing, as defined by the DEP. In Bradford County, there has been variability in different operators' pre-drill testing parameters. As a result, some landowners' water has been impacted without satisfactory determination of liability due to lack of specific testing to establish a proper baseline. While protecting the privacy (name) of the landowner, these testing results should be made available to the public through a searchable online database. This could be especially useful data for researchers.

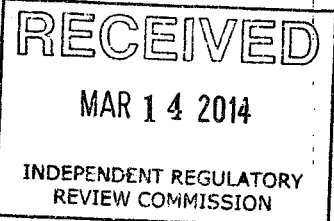
Abandoned and orphan well identification (78.52a) should be done by the operator prior to drilling, not just prior to fracking. After all, there have been instances in our Northern Tier Counties of methane migration prior to fracking, even without the presence of abandoned wells. Since the industry fully acknowledges that unplugged abandoned wells are a prime route for methane migration, it seems logical that there is an even greater risk of pre-fracking problems occurring in their presence. Ideally, these abandoned wells should be plugged prior to drilling rather than just monitoring them after fracking. It is much easier to prevent contamination than to try remediating it. There should be adequate fees imposed for the purpose of plugging more of these abandoned wells. Along the same area of concern, the bonding requirements for O&G activities are woefully inadequate. If these cannot be increased, there should be rigorous verification by DEP inspection that well sites are properly restored and plugged prior to releasing the operator from liability.

The disposal of various wastes through burying on site or spreading via land or road application should not be allowed. There is not adequate testing or oversight to keep hazardous chemicals, residual waste and radioactive material from contaminating our water. At the very least, the landowner should be notified and given the opportunity to stop these practices from being carried out.

Finally, given the availability of closed loop systems, the use of pits and open topped tanks should be banned for short term storage due to their history of spills and leaks and the potential for air pollution. Many operators are already using these systems. Other operators should be required to adopt these "best management practices."

Thank you for your time and efforts in strengthening these regulations.

3042



William Ferullo , 4834 Leraysville Rd. , Warren Center ,Pa 18851 February 10, 2014

After experiencing natural gas drilling and extraction in my area of NE Bradford County ,PA. for the last four years and seeing many issues related to this process go unregulated or just plain ignored by the state of Pennsylvania ,I have made it my main point of concern to propose the following mandatory regulations for the extraction of natural gas in this state .Although natural gas drilling will never be totally safe or predictable due to the drilling process itself , possibly these proposed mandatory regulations will help improve the conditions the public will have to endure in the future in Pennsylvania . I feel it has been very irresponsible for the state of Pennsylvania and the PA DEP to have allowed natural gas drilling , using such a heavy industrial process next to people's homes without having had the proper regulations , staffing and doing a comprehensive environmental impact study before any drilling was even allowed here .I congratulate the state of New York for having the foresight and concern for their public and environment .far beyond that of the state of Pennsylvania . I hope all public commenting being held by the EQB is more than just a performance for the benefit of convincing people HVHF is under control and safe which it is not . The mandatory regulations I offer are as follows :

....# 1 Water supplies should be restored to the standards of the Safe Drinking Water Act and all exemptions from this act be eliminated immediately . Emphasis needs to be put in place to help the public having issues caused by the natural gas extraction process and speed up the resolving of such issues related to the drilling .There are people who have had issues caused by NG drilling who have not had any contact or decision from the DEP for a year or longer in most cases . Once you have a problem caused by drilling , it can be a long haul to get any resolution if any at all from the state ,DEP or a drilling company involved .

....# 2 The DEP should establish standards to protect people in drilling areas with mandatory pre - drilling and after drilling/fracing water testing throughout the state of PA.....

# 3 Testing of all drill cuttings and waste from the NG drilling process should be made mandatory and comply to safe standards for the public .No disposal on site shall be allowed .....

....# 4 Establish strict mandatory standards and regulations for silica sand dust contamination caused by fracing on sites near people's homes .This dust can travel long distances on windy days This is not being addressed !....

.....#5 Establish mandatory regulations using the best technology known to eliminate pollution from all natural gas related operations and facilities and have mandatory state inspections on a monthly basis on all facilities in the state of Pennsylvania .

...# 6 Create a statewide information and response program throughout the state of PA. to inform, educate , and protect all residents from possible emergencies caused by natural gas operations .....

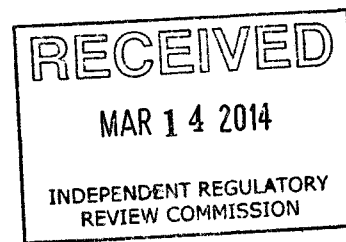
...# 7 Increase air monitoring sites close to sources of pollution and all facilities of NG extraction, protecting local residents from sources of pollution and increased amounts of this pollution caused by possible inversion due to our local mountainous terrain here in Pennsylvania .

...# 8 The use of Halliburton's Clean Stim should be made mandatory for all future fracing done anywhere in the state of PA. High concentrations of chemicals should be banned indefinitely .....

These are only a few of the many controls needed for protecting the public from this industrial extraction of natural gas in this state .

.....Thank you William A Ferullo

3042  
Krystle Bristol  
45 Bristol Lane  
Troy, PA 16947



Good evening, my name is Krystle Bristol, I am the President of the Troy Borough Council and the President of the Troy Chamber of Commerce. I am also the Business Manager at Bristol Excavating, Inc., a local business established here in Troy by my father-in-law in 1989, I live here in town with my husband Kyle and our son Calvin. I am pleased to welcome the members of the DEP and the Environmental Quality Board to our town, the epicenter of the Marcellus Shale development. I would first like to commend you all on the excellent job you do regulating the oil and gas industry in Pennsylvania and specifically in our County. As a result of your efforts, our region has remained a tourist destination and is just as beautiful as ever. However, unlike six years ago, our towns are now prospering economically too, giving our area the best of both worlds. I would like to speak from several perspectives in my testimony to explain how the development of the Marcellus Shale affects my family, myself as a businesswoman involved in the industry, and how it affects me as a local elected official.

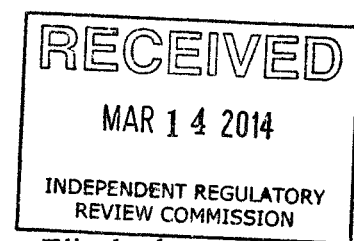
I am originally from Corning, NY and my husband Kyle is from Troy. After serving our Country as a United States Marine, Kyle moved back here in 2006 to work with his dad in the family business. By 2008 the construction industry here was so slow that Kyle was laid off and I was working a retail management job in Horseheads, NY, driving almost an hour one way for a good job with decent pay and benefits. All of that changed in 2009. Bristol Excavating went from 5 employees in 2008 to almost 30 in 2013. Median pay at our company has increased 40% and we now offer health insurance and a 401K plan, benefits that were almost unheard of here in 2008, unless you had a state job. We now work with numerous responsible drilling and pipeline companies and witness firsthand the emphasis placed on safety and environmental regulations. Talisman Energy is a wonderful example of a responsible community minded company. Their good neighbor program ensures good stewardship of the land and they work hard to establish good relationships with community members and local businesses.

As the Business Manager of Bristol Excavating, Inc., I am responsible for maintaining all licenses and registrations required for us to do business, in this capacity, I know that regulations, though necessary, don't always apply to everyone equally. For example, with a fleet of only eleven trucks that operate in two states, I maintain ten licenses or registrations required on the trucks (NY HUT, IFTA, PA WH, NY Divisible Load, 2290, NY WH, DOT, MC, UCR, and Apportioned Plate registration), these are the same registrations that would be required for a fleet of 100 trucks. The proposed regulations don't recognize the difference of conventional and unconventional wells. In some cases the new regulations may appear as just oversight but to small business conventional well operators these regulations may be a very unnecessary burden. Before you invoke these new regulations please be sure you are achieving the appropriate outcome, protecting our environment, not putting good job creating small businesses out of business. The regulatory requirements whether they be Federal or State for the construction industry get more extensive each year. I am afraid of the effect that this will have on the small businesses that need to stay in compliance while trying to manage overhead. There is a fine line between necessary oversight and burdensome regulation.

As a public servant, I have seen a lot of revenue generated in our Borough as the direct result of drilling in our region. This year, Troy Borough will be looking to repair two bridges in town that are in dire need of restoration, these projects are made possible by the money generated by Act 13. The Borough has also incurred over \$900k in revenue from the sale of bulk water to various gas companies since 2010. This money temporarily eliminated an \$11 a month surcharge on all Borough residents water bills that was used to satisfy a debt incurred to make upgrades on the town waters infrastructure. The Borough has also used revenue from bulk water sales to replace water mains in the Borough and to install a town wide automatic meter read system. These are just a few examples of constructive impacts the gas industry has had on our Borough.

In conclusion, I believe there is a responsible way to develop the Marcellus Shale conscientiously and for Pennsylvania to aid America in becoming an energy independent nation. The DEP has been doing a wonderful job to encourage economic growth while maintaining our beautiful landscape, thank you and keep up the good work.

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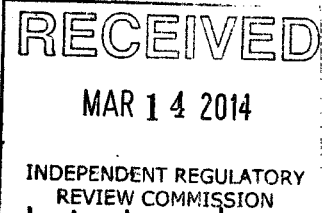


Good evening. My name is Amanda Gruenbaum. I am a junior at Elizabethtown College in Elizabethtown, PA. I am here tonight to add my voice to this discussion and represent the many college students across Pennsylvania that are and will be in the near future seeking more than just a job, but a career. We as a student ecosystem have become interested in the proposed rulemaking affecting the natural gas industry.

My main focus pertains to jobs. Whether it is direct or indirect, the oil and natural gas industry provides and supports hundreds of thousands of jobs in Pennsylvania, and not just in the areas of the state that are realizing the development of this energy resource. The natural gas industry is a job multiplier, so for students seeking a career in supply chain management, mechanical engineering, civil engineering as well as communications like me have a better chance of finding a job within their field of studies. In fact, a lot of industries will be able to grow and provide more jobs to residents of Pennsylvania as natural gas becomes a consumer resource across our state. The more careers the state can provide its youth, the more of a chance Pennsylvania's youth will be able to work and raise their families here in Pennsylvania.

Thank you for your time.

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TESTIMONY FOR PUBLIC HEARING, JANUARY 16, 2014  
On Amendments to 35 PA Code chapter 78, Subchapter C



Hello, I'm Bill Schneider from Hampden Township. I'm a registered Independent voter and I'm old. I've been around for awhile. Tonight, I'd like to put an old guy's perspective on the Marcellus Shale Water Quality Issue here in PA.

As we travel down Memory Lane in the next 3 or 4 minutes, please keep in mind the old adage, "Names and faces keep changing, but the stories are always the same."

Those of us who were around in March 1979 probably recall Jack Herbein, Vice-President for Power Generation for Metropolitan Edison/GPU holding a news conference at Three Mile Island, telling us the situation was under control, when at that very moment, uncontrolled radioactive releases were occurring.

Remember the Exxon Valdez? Instead of complying with remedial sanctions to clean up the environmental disaster they caused, Exxon/Mobil spent the next twenty years in court attempting to mitigate or eliminate the extent of the fines and penalties imposed.

And the warm and fuzzy BP "Commitment to the Gulf" ads aired constantly over the past year...guess what? Their legal team commenced the same kind of legal campaign that Exxon/Mobil employed in their attempts to get the financial sanctions necessary to clean up their mess reduced or eliminated.

We know that next to agricultural runoff, acid mine drainage is the greatest contributor to water pollution in the Commonwealth; and most of the culprits are mining operations shut down more than 50 years ago.

We know that Governor Tom Corbett has received \$1.8 million in campaign contributions from gas companies. And we know that Halliburton, Cabot, and other drillers have amassed over 4,000 violations over the past four years.

We know there are roughly 200,000 abandoned oil wells statewide, mostly unmapped, dating from the discovery of oil in PA in 1859.

We also know that 10% of Marcellus Shale drill holes leak methane when they are first drilled, and that number grows to about 50% after 10 years. We know that 30-40% of the water injected into the earth as part of the fracking process stays within the earth. We do NOT know where that toxic waste will end up, especially if an earthquake or a change in the rock strata occurs, possibly causing waterway pollution, or else remaining underground-- never again to be part of the water cycle; either way, the indigenous water supply we all need for survival is depleted.

We know that a gag order is imposed when fracking companies enter into settlements with aggrieved citizens whose wells have been polluted, so the rest of us can't access information that would identify risks to which we may unknowingly be exposed.

So tonight I ask you this fundamental question. Do you believe the fracking companies are any different than GPU, or Exxon/Mobil, or BP, or the mine owners who've been gone for 100 years? Does their commitment to their shareholders take a back seat to public health concerns? I think not, especially when key political leaders are in their back pocket.

I believe fracking will create a major environmental disaster within the next decade. I say that because even if frackers go by the book 99% of the time, the fact that we're knowingly polluting the earth's crust will eventually catch up with us. What PA needs is a "disaster fund", regularly replenished by fracker earnings, so the drillers pay for the damage they cause, not the Commonwealth's taxpayers.

Since I doubt that our government leaders possess the political courage for such a bold move, here are "half-measures" that will serve to mitigate some of the risk:

- 1) The DEP should require drilling company operators to restore contaminated drinking water to Drinking Water Act standards.
- 2) Drilling company operators should be prohibited from using open pits for waste storage.
- 3) Regarding waste disposal, drillers should follow the federal regulations for hazardous substances that other industries must follow.

And 4) Drillers must identify existing wells BEFORE site and well construction and drilling (not just fracking) so that the new well can be modified if needed. Drillers must then plug and seal the old orphaned/abandoned wells according to state safety standards prior to new wells being drilled.

Thank you,

William H. Schneider  
5007 Apache Drive  
Mechanicsburg, PA 17050  
717-737-3494  
Apache5007@aol.com



## **Perilous Pathways: How Abandoned Wells Can Contribute To Methane Migration Problems**

# **PERILOUS PATHWAYS**

The Danger of Drilling Near Abandoned Wells

### **Part 1: Why abandoned wells are a problem**

Infographic: How abandoned wells can contribute to methane migration

### **Part 2: How many wells dot Pennsylvania, and why aren't we plugging more of them?**

### **Map: Known abandoned wells in Pennsylvania**

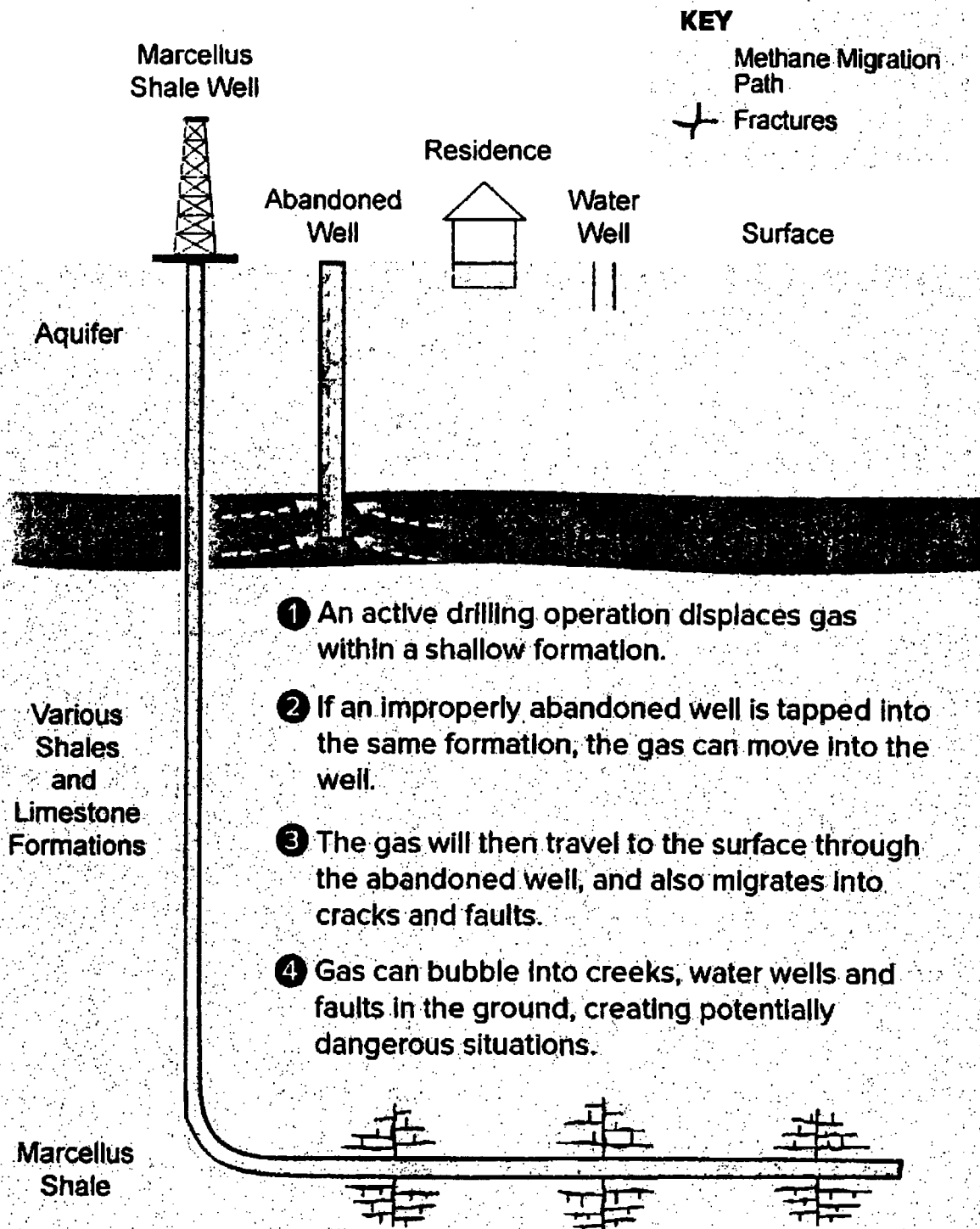
### **Part 3: How to track down an abandoned well**

### **Part 4: States don't do much to regulate drilling near abandoned wells**

Methane is a flammable, odorless gas that exists within underground shale formations. Because of the porous, intertwined rock formations that many parts of Pennsylvania sit on top of, the gas can naturally seep to the surface. Methane can be dangerous when it migrates into water wells or basements.

Orphaned and abandoned oil and gas wells create a natural pathway for methane to migrate from. The process can be accelerated when an active well is drilled into the same formation the abandoned well is tapped into. This occurrence — called “communication” — is extremely rare, but it can create major problems at the surface. A 30-foot geyser of gas and water that burst through the ground in Tioga County in June was likely caused by Marcellus Shale drilling near an abandoned well.

This graphic shows how methane gas can make its way from deep underground into a basement, water well or the ground.

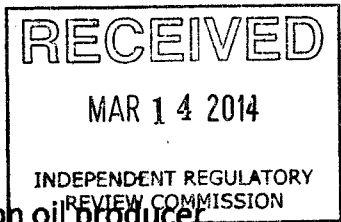


Notes: This graphic is not to scale.

The abandoned well scenario is only one of several ways that methane migration can occur.

STATEIMPACT REPORTING, GRAPHIC PRODUCED BY YAN LU

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Good evening my name is Glenn Weaver, I am a fourth generation oil producer. My son who just turned 50 is in business with me and is a fifth.

Like the farmer's son who had to work on the farm when he was growing up, I had to work in the oil field. I said I will never work at this greasy, heavy tight work. But here I am 55 years later and I love it. But I would like it better with less ridiculous regulations. Such as act 13 and these regulations that we are here to discuss tonight. Some of these are, 2 years ago an application for a permit to drill a well was 2 pages. Now that same application is 17 pages. Thanks to Act 13, we now have to make contact with any township or municipality bordering the township or municipality which we are applying for a permit to drill.

I understand the reason for this, for an unconventional well because of the amount of truck traffic on an unconventional well. For instance moving the rig in is 40 loads of equipment, the pipe 5 or 6 loads then several hundred truckloads of water and sand to frac. Then 20 or more pump trucks to frac and many loads of water out for treatment.

Our shallow wells take 3 truckloads to move the rig in, one small load of pipe, then one to cement and 3 to frac for 4 or 5 hours and maybe 3 loads of water out for treatment.

The size of our locations are 50' by 100 ft or at most 100 by 100 and an unconventional site is 5 acres and twice as wide a road for regress.

The cost of an average shallow well in PA is 1% of the cost of the Marcellus or Utica well. An issue we recently dealt with is silly before act 13 when we broke ground on our well sites we were required to post on site our E & S plan. Now they want our E & S plan, the drilling permit, and casing cement plan. In the past we did not post the last 2 till we began to drill. From location building to drilling can vary from days to months. We just got a fine for not having the cement plan on location when I know it was right there in the mail box. It is complete Chaos.

The unconventional companies have lots of full time people to do all the paper work but we don't. We would like to be legal but all this goes beyond reason.

If we do not see change there will not be small operators like myself within 2 years.

When I was a boy growing up my father had 5 refineries to sell his oil too. We now only have 2.

How long will they be around when we lose the small operators to an over kill of regulation? At the price of oil, the oil patch should be booming but it is losing.

Thank you for the opportunity to express our concerns.

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From the Pennsylvania Constitution – Declaration of Rights –Article 1, Section 27:

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people.

The Environmental Rights Amendment was ratified in 1971 by Pennsylvania's voters by a four-to-one margin. For more than 200 years citizens of this state paid the ultimate environmental price after industrial interest stripped our forests bare and extracted our iron, coal, gas and oil. It was not until the advent of the television that we became "painfully aware of the damage inflicted upon our environment by the unregulated and under-regulated use of our natural resources."<sup>1</sup> We realized that the trustees of our Common Wealth had been exploiting our natural resources, and the environment in which we live, for economic prosperity, and we demanded that our state government, the trustees appointed by us to act on our behalf, no longer stand as accessories' to the exploitation of our of our natural resources.

People across the state will be weighing in on your new proposed regulations for oil and gas. They will recommend additional provisions, setbacks, definitions, etc. I hope and pray that you heed their suggestions. But it is my belief that regulations in general simply give the industry permission to pollute; it just a matter of how much they are allowed to poison our environment and exploit our natural resources.

New regulations will not change the fact that the PA DEP is woefully and purposefully understaffed and under funded. You have failed to perform your duties with even the current regulations. You are not doing your job and the people of this Common Wealth have lost faith in you.

In Lawrence County, where I live, four private water wells were affected soon after drilling began for a non-conventional well in Pulaski Township in May of 2012. Two of the landowners contacted the DEP when they began to see changes in the quality of their water, the other two contacted Hilcorp Energy, who subsequently failed to report the incident within 24hrs; violating 25 PA Code 78.51. Correspondence records show that the DEP began investigating the possible contamination of all four wells and water tests were taken on numerous occasions.

On August 1, 2013 the DEP sent a letter to Hilcorp Energy requesting information regarding the investigation of the four affected water supplies. The last time any of these wells had been tested was November 8, 2012. An inter-office memo dated September 25, 2013 again reiterated that four private water wells had been affected and on October 1, 2013 the DEP finally went back to test those wells. But they didn't test all four wells; they only tested the two wells whose original complaint had been filed directly with the DEP. Based on the water tests taken in October, the DEP determined that nearby natural gas

drilling had affected their private water wells and these two landowners were sent the results of these findings in early November of 2013.

The DEP never went back to re-test the water supplies for the two landowners who first contacted Hilcorp Energy when they notice changes in their water. They also received letters from the DEP around the same time as the first two determination letters were sent out, but their wells were only found to be "temporarily affect." Their results were based on water tests taken a year earlier on November 8, 2012 and according to the DEP letter, their investigation is now closed.

Why in the world wouldn't the DEP retest all four water wells? It makes absolutely no sense to me. You did NOT protect these land owners and you wasted tax payer dollars. You're not doing your job. From my perspective, this is a clear example of government allowing the exploitation of our resources at the expense of its citizens.

According to DEP's Geologist Christine Minor, "no one was complaining" in regard to water contamination at the later two locations. Do people in your administration really believe that Hilcorp Energy is going to continue complaining, on behalf of the landowner, regarding the impact that their gas well has had on the landowner's private water well for which they might be liable? Why does the DEP allows the industry to run their own investigations into such issues by hiring their own water testing companies; you've put the fox in charge of watching the hen house! Regulations are meaningless if the rules of practice and procedure do not allow - those trustees which we employ - to perform in a responsible and common sense manor.

I have read the proposed regulations and I do believe, on paper, you have presented some major improvements to the current rules, and I do have specific comments to the proposed rules that will be submitted via the Environmental Quality Board on-line system.

In closing, I urge the EQT to expand the public comment period to at least 120 days to allow the Amish communities, who are such a vital part of Pennsylvania's agriculture where much of the oil and gas drilling is occurring. The Amish represent a huge part of our landscape and they do not have access to many of the media outlets and publications that most of us in this room have access too. They have not been provided adequate notification. You should also host more public hearings in the most heavily impacted counties like Bradford, Susquehanna, Tioga, Greene, Armstrong and Butler Counties. Why would our government agencies host two of the seven hearings in counties where the highly controversial unconventional gas drilling is not occurring? It makes absolutely no sense to me, and I am sure landowners in areas most familiar with the short comings of the current regulations, would have a lot to say about your proposed regulations.

<sup>1</sup> Franklin L. Kury – As a member of the House of Representatives in 1967, he drafted and introduced the legislation that led to the establishment of Article 1 Section 27 of the Pennsylvania Constitution  
*ConservationLand.org*

Carrie Hahn  
994 Indian Run Rd  
Volant, PA, 16156