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MAR 13 2014  
DEP Policy Office

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MAR 17 2014  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 24, 2014

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

Dear Board Members,

I am the President of Allegheny Enterprises, Inc. which operates approximately 200 shallow, conventional oil and gas wells in Pennsylvania and have been made aware of the regulations currently being considered for approval by your board. We oppose any additional regulations on an already overburdened regulatory climate.

Shallow oil and gas wells have operated in this state for over 150 years. Current oversight governing, existing and future wells is more than needed, to protect the environmental concerns while still enabling producers like us to operate with some margin of profit.

Legacy wells that produce less than a barrel of oil per day and /or minimal amounts of gas, will not support the cost of additional regulations. This will result in more unemployment, loss of production vital to our local economy, by reduction of our local tax base. The trickledown effect will cause harm to all the local businesses that depend on the millions of dollars companies like ours puts into the local economy. Small producers going out of business will add thousands of wells to the abandoned well list the state will be burdened with plugging costs in addition to the large number of abandoned wells that state funds should have already been used to plug.

Drilling and producing conventional wells must not be regulated by the same rules as deep, shale unconventional wells. The proposed regulation package, as it now stands is overly broad, burdensome and time consuming without adding meaningful protection to the environment.

Please vote "NO" to these proposed regulations, we need existing and future conventional wells to be able to operate under the existing regulations in place before the passage of ACT 13 of 2012. Let's bring common sense back to government oversight.

Sincerely,

Randy F Stout  
President, Allegheny Enterprises, Inc.