Cooper, Kathy

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INDEPENDENT REGULATORY

From:

RegComments@pa.gov

Sent:

Monday, March 17, 2014 4:19 PM

To:

REVIEW COMMISSION Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;

RegComments@pa.gov; eregop@pahousegop.com;

kegComments@pa.gov; eregop@panousegop.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:

Richard V Pepino

Earth & Environmental Science Department - UPENN (rpepino@sas.upenn.edu)

, PA US

Comments entered:

Section 78.68b. Temporary pipelines for Oil and gas gathering lines.

Too often, the entire length of pipeline corridor is cleared and graded all at once early in the project, and the cleared land (and any excavated trenches) remains in an unstabilized state for long periods of time, allowing unwanted non-point source runoff to occur. To eliminate these water quality (WQ) impacts construction should be phased to limit the areal extent and duration of earth disturbance and provide for more timely stabilization of at least those areas tributary to sensitive water resources (at least Exceptional or High Value Waters). Permanent stabilization should proceed IMMEDIATELY in sensitive areas once the pipe is placed in the ground and the trench backfilled. Since the core concept of these proposed amendments is the protection of public lands, this recommendation will decrease potential significant WQ impacts and better protect Waters of the State.

Richard V. Pepino

Earth & Environmental Science Department School of Arts & Sciences University of Pennsylvania

No attachments were included as part of this comment.