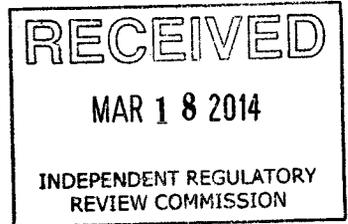


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VIA ELECTRONIC SUBMISSION TO REGCOMMENTS@PA.GOV

March 14, 2014
Environmental Quality Board
Rachel Carson State Office Building, 16th Floor
400 Market Street
Harrisburg, PA 17101



Re: Cabot Oil & Gas Corporation Comments on Proposed Amendments to 25 PA Code Chapter 78, Environmental Protection Performance Standards at Oil and Gas Well Sites

Dear Environmental Quality Board Members:

Cabot Oil & Gas Corporation (Cabot) submits the following comments regarding the subject proposed amendments to 25 PA Code Chapter 78. In addition, Cabot also hereby incorporates by reference the comments submitted by the Marcellus Shale Coalition on March 14, 2014.

- Cabot proposes that the Environmental Quality Board (EQB) add language to the proposed text of Chapter 78 to allow oil and gas owners/operators to amend PADEP-approved drilling permits by lengthening laterals without having to restart the permitting process. Assuming no other deviations from the approved permit would occur, owners/operators could continue to pursue unleased properties after receiving a permit to drill from the PADEP. Such a permitting mechanism to lengthen a horizontal gas well lateral would allow owners/operators to maximize the ability to remove as much of the oil and gas resources as possible from a single well pad, thereby minimizing the environmental footprint on the surface. In addition, such a permitting mechanism would reduce the permitting burden on PADEP permitting staff resources. The envisioned permitting mechanism would simply be administrative in nature.
- §78.17 Permit Renewal – Cabot suggests that the EQB consider extending the well permit renewal period from one year to two years. This would reduce administrative time on the part of the PADEP and would allow owners/operators greater flexibility. Assuming the technical considerations of the well permit would not be modified, this would strictly be an administrative adjustment.
- §78.52(c) – The accredited laboratory often times does not oversee the environmental technicians collecting the samples. Cabot does not believe the accredited laboratory can truly affirm that the sampling was performed in accordance with the laboratory's approved procedures. Cabot suggests this requirement be struck from Chapter 78.
- §78.55 Control and disposal planning; emergency response for unconventional wells – As most well pads are very similar in nature and design, Cabot suggests that site-specific requirements for PPC plans be struck from the Chapter 78 language. Cabot believes that a master plan governing all owner/operator locations is appropriate.

- §78.69(f) Water Management Plan Renewals – Cabot suggests that WMP renewal applications be submitted 30 or 60 days prior to expiration as opposed to 6 months in advance.

If the EQB has questions or needs clarification regarding this submittal, please contact the following:

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