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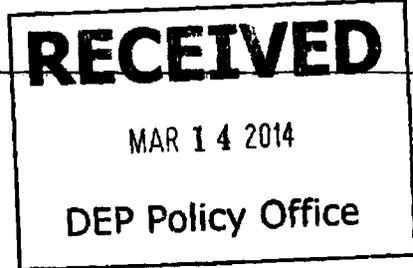
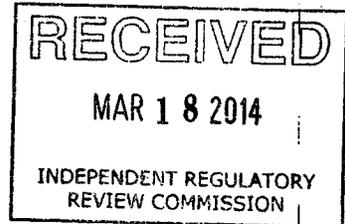


Catawissa Township

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

RE: Proposed Amendments to 25 PA Code Chapter 78

Dear Members of the Board,

The Catawissa Township Supervisors strongly believe in the protection of Pennsylvania's vital drinking water resources. The broadening development of the oil and gas industry may expose our water sources to multiple avenues for contamination if proper safeguards are not put into place.

Many water systems in the Commonwealth, through a DEP sponsored program, have had Source Water Protection Zones (SWPZs) determined during the development of their Source Water Protection Plans (SWPPs). These Zones and Plans were developed by professional geologists and approved by DEP. The delineations of SWPZs has been instrumental in improving a water system's awareness to the extent of their source waters' vulnerability to contamination. Now that these Zones have been established, water systems, Source Water Protection Committees and Coalitions, that have taken on the task of protecting source waters, know the actual sensitive, invaluable areas that need to be safeguarded from potential sources of contamination.

The next logical step would be for DEP to recognize the SWPZs, when they are available, instead of the blanket set-back distance, during the permit review process. Utilizing the SWPZs will save the Department time by identifying the water systems in the proposed permit area and to what extent the proposed activity would extend into each system's vital recharge area. Additionally, the Zones are readily available in electronic format and could easily be included in the e-Facts system.

Another area the SWPZs should be utilized is in DEP's review of any plans for spreading brine on paved and unpaved roads. The proposed regulation already requires the applicant to include the roads to be treated, so again, it would be a simple process to cross-reference with the SWPZs. If any on the roads are in a SWPZ, the affiliated water system should be notified and provided with a copy of the brine's chemical analysis. The water system should also be given the opportunity to submit a comment to DEP to be considered during the Department's review of the plan.

Therefore, the Catawissa Township Supervisors respectfully requests that the Board considers these comments for DEP to recognize SWPZs during the review of oil and gas permits and brine application plans, in order to protect vital drinking water sources.

Sincerely,

Catawissa Township Supervisors