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From: RegComments@pa.gov
Sent: Saturday, December 14, 2013 10:32 AM
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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.

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Comments entered:

There is a need to establish and enforce ethical standards in order to insulate regulatory agencies from political or financial influences provided by the natural gas companies and their agents. FERC has to approve any interstate pipeline. The PUC has to approve any pipelines that serve consumers directly. But few of the new gas pipelines connected to Marcellus Shale drilling fall neatly into either of the categories. TEAM 2014 PROJECT proposes an additional 600,000 dekatherms (Dthd) of liquified natural gas export in 36" diameter pipeline with horsepower upgrades. The proposed pipeline will not carry "clean"energy, this Spectra pipeline will be carrying Marcellus Shale gas. Pipelines and fracking are inextricably linked. The Spectra pipeline would have more profound effect than most, Greenhouse gases would be emitted 24/7. There is a history of safety issues with Spectra Energy. In 2011 DOT Pipeline and PHMSA inspectors sited Spectra for 17 inadequacies in its pipeline safety operations and procedures, including problems with pipeline surveillance, emergency plans and welding procedures. Texas Eastern, the subsidiary of Spectra that proposes to build the TEAM 2014 Project, received the EPA's seventh highest Federal Penalty Assessment on record for PCB contamination. The plan is for the TEAM 2014 Project to be monitored by the builder/applicant Spectra and it's subsidiaries, the DEIS states, " The applicants would operate and maintain the newly constructed pipeline facilities in the same manner as they currently operate and maintain their existing systems." Through their own efforts, the property owners of Clearville, Bedford County, PA know that the Spectra Energy two-day incident at the Steadman Ridge facility, an uncontrolled leak released 431.5 thousand cubic feet of natural gas into the atmosphere. In January 8, 2013, PHMSA sent a letter to a senior official at the Texas Eastern Transmission Co., a wholly owned subsidiary of Spectra Energy citing the company for failing to adequately protect its metal pipelines from corrosion

and for failing to properly test shut-off valves meant to staunch the flow of natural gas in the event of an emergency. The complete citation can be read; PHMSA Texas Eastern Transmission Notice of Probable Violation 01082013. Public confidence in pipeline safety has been tested by a series of serious accidents. In 2010, the natural gas line explosion in San Bruno, CA., set off a 95 minute inferno that killed 8 people, destroyed 38 homes and damaged scores of others. Emergency equipment was unable to contain the destruction because of the level of heat radiating from the fire. The DOT needs to implement rule making to clarify the point where onshore-regulated gas gathering lines begin (49 CFR Part 192.8). This point must include all Class One gathering lines, in all states, under full requirements of the Gas Transmission Pipeline Integrity Management Program (49 CFR Part 192 Subpart 0). The EPA is recommended to include requirements in permits for pipeline construction and operation that avoid and properly mitigate surface disturbances in steep inclines and declines, avoid and properly mitigate impacts to sensitive wildlife habitats, avoid forest fragmentation, prevent disruption of view-sheds, and avoid intersection with waterways. Requiring pipeline operators to install methane capture devices on all production pipelines and compressor stations and institute an EPA program of regular emissions monitoring along gathering and transmission pipelines to reduce methane leakage. There should be more direct state and local government involvement in siting of larger diameter, higher pressure Marcellus Shale gathering pipelines in Class One, rural areas of Pennsylvania, especially near schools, hospitals, and other community centers. These gathering lines should be sited with the same precautions as are paid to federal interstate transmission pipelines. Relative to Marcellus Shale natural gas development, the major concerns involve accidents at gas well sites, gathering lines and the transportation of hazardous materials. Because a pipeline failure could pose a significant risk to the people and the sensitive environment, increased public awareness of pipeline safety and appropriate regulation is imperative. Complicating the onset of a new pipeline network to meet increasing demands are problems of the existing pipeline infrastructure, it's old and deteriorating. Population shifts and economic development has transformed once rural and remote areas into areas where a pipeline incident could have profound environmental impact and loss of life. New expanding pipeline networks are placing additional demands on outmoded transmission systems that may lead to unanticipated consequences.

In 2008 PHMSA studied proximity of structures next to pipelines. The result created a coalition of local planning officials, pipeline operators, environmental organizations and public safety agencies to develop advisory standards for new development around existing pipelines. The group, called Pipeline Informed Planning Alliance (PIPA) came up with a clear message: don't build close to a pipeline! PIPA suggested that extra precautions be taken and extra planning to be done if buildings are within 660 feet to 1000 feet on either side of a pipeline. If a pipeline goes through a forested area, a clear cut of an extra 70 to 130 feet wide is needed to lay pipe and keep it available for maintenance. "Public health was not brought into discussions about shale extraction at earlier stages; in consequence, the health system finds itself lacking critical information about environmental and public health impacts of the technologies and unable to address concerns by regulators at the federal and state levels, communities, and workers....- Institute of Medicine at the National Academies of Science. Recent and projected growth in the oil and gas production sector has underscored the need for EPA to gain a better understanding of emissions and potential risks from this industry sector. Harmful pollutants emitted from this industry include air toxics such as benzene, toluene, ethylbenzene and xylene; criteria pollutants and ozone precursors such as NOx and VOCs; and greenhouse gases such as methane. These pollutants can result in serious health impacts. However, EPA has limited directly measured air emissions data on criteria and toxic air pollutants for several important oil and gas production processes. This limited data, coupled with poor quality and insufficient emission factors and incomplete NEI data, hamper EPA's ability to assess air quality impacts from selected oil and gas production activities.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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