

3042.

Cooper, Kathy

From: RegComments@pa.gov
Sent: Monday, May 04, 2015 8:49 AM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC; RegComments@pa.gov; eregop@pahousegop.com; environmentalcommittee@pahouse.net; gvitali@pahouse.net
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment notice for - Advanced Notice of Final Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites (7-484)



Re: Advanced Notice of Final Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites (7-484)

The following comments have been received regarding the above-referenced advanced notice of final rulemaking.

RECEIVED
IRRC
2015 MAY -4 AM 9:51

Commentator Information:

David Wasilewski
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Comments entered:

Regarding the PA DEP review/revision of regulations pertaining to unconventional drilling for natural gas and/or oil.

1. 78.56-78a.56 and 78.57-78a.57 would eliminate the use of temporary storage pits for production fluids generated at fracking sites. The fact that this barbaric practice has been allowed in PA is absolutely without justification. Allowing open-air pits filled with poisonous liquid only a few hundred feet from residences is an atrocity.
2. 78.59c and 78a.59c allows the use of centralized open-air impoundments for the storage of liquid fracking waste. Open-air pits filled with poison constitute a serious threat to the environment and all living things therein. All forms of open-air poison storage should be strictly forbidden. The health of citizens, the environment, and all organisms occupying the environment should take preference over cost saving measures preferred by drillers.
3. 78.61-78.63 and 78a.61-78a.63 allow for on-site disposal of fracking waste. Allowing areas zoned for agriculture or residences to be used as toxic landfill sites is simply without any rational justification.
4. 78.15-78a.15 proposes regulations for drilling well pads within 100 feet of streams or wetlands. The distance of 100 feet is patently inadequate to provide protection of streams and wetlands from the activities associated with high-volume hydraulic fracturing. This part of the proposed regulations update is a farce.

5. 78.51-78a.51 requires drillers to restore impacted drinking water to pre-drilling quality. Who is responsible for determining pre-drilling quality. The driller... who will point at any possible trace amount of an undesirable substance and then call this a "preexisting condition" when the relevant levels are elevated? The property-owner... who would then need to spend thousands of dollars annually to maintain seasonal water quality records? This part of the proposed regulatory framework appears to be realistically meaningless.

78.56-78a.56 and 78.57-78a.57 allow for the use of buried tanks for toxic liquid waste storage. Little else is mentioned about the maintenance or allowable time period correlated with the existence of buried waste tanks.

These links provide access to the attachments provided as part of this comment. You are advised to save the attachments to your local computer or a network share when prompted by your browser.

Comments Attachment: [PA DEP proposed regulations.docx](#)

Please contact me if you have any questions.

Sincerely,
Patrick McDonnell

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