

3042
Cooper, Kathy

From: RegComments@pa.gov
Sent: Tuesday, May 19, 2015 10:37 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.

Commentator Information:

Richard Martin
Coordinator, PA Forest Coalition (ForestCoalition@aol.com)
740 Oak Hill
Boiling Springs, PA 17007 US

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IRRC
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Comments entered:

Prohibit operators from using any open-air pits and tanks for storage or treatment of drilling or any other fracking waste products.

Protect streams and wetlands by measuring the distance from the edge of the well pad or facility and increasing the distance to 300 feet. An adequate number of real-time monitors must be installed in the wetlands or streams to detect changes in the water quality.

Existing pits which contain fracking wastes, including wastewater, drill cuttings, and any other substances that returns to the surface after fracking must be transferred to closed above ground systems within one year of this regulation and may not be buried on-site [no "toxic teabags"].

All waste which has returned to the surface must be monitored, inspected and documented weekly. Treatment and or transport to an approved waste disposal site must be documented with a paper trail.

DEP must require all contaminated water supplies to be restored to either pre-drilling or safe drinking water act standards, whichever is better.

DEP must prohibit the use of wastewater (brine) from both conventional and unconventional wells as a de-icer or dust suppressant. The practice has not been proven safe and the cumulative effects are unknown.

Setbacks for schools are insufficient. The distances in the draft regulations should be tripled. Measurement should be measured from property boundary of the school to the boundary of the gas lease. These "school setback" should also be apply to hospitals, churches, nursing homes, and day care centers.

Operators of unconventional wells must locate, map document and plug all orphan and/or abandoned wells within one mile of the newly-proposed well pad prior to spudding any new wells.

DEP must require that all electronic filings and reports made by operators be made available to the public on DEP's website on the same day they are deemed complete by DEP. Easy and timely access to information by the public is necessary to ensure agency transparency and operator accountability.

While DEP is required by law to issue two sets of regulations for conventional and unconventional wells, the wording should be almost identical, since conventional wells utilize chemicals, create waste, and cause similar erosion & sedimentation problems. Both operations cause spills, accidents and contamination of air and water.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Patrick McDonnell

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