

From: RegComments@pa.gov
Sent: Thursday, May 21, 2015 3:55 PM
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:

Bradley Boldt
 (bradleyboldt@yahoo.com)
 212 Ewing Rd
 Pittsburgh, PA 15205 US

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 IRRC
 2015 MAY 22 AM 9:07

Comments entered:

I am writing this email in response to the proposed changes to Chapter 78 as a concerned oil and natural gas industry employee. There are hundreds of changes, deletions and additions of wording in the document and I stand by the thorough review that the Marcellus Shale Coalition will be providing as well as Cabot Oil & Gas Corporation's official statement on the proposed changes.

Why are we so anti-oil & gas in this state? Imagine where this state would be if we wouldn't have had this boom in industry investment. Why are we so quick to frighten the industry away? Shouldn't we be inviting them with open arms? With the new poorly designed regulations we are asking too much of the oil & gas industry. I understand that the DEP is just trying to do their jobs, but sometimes it is okay to accept that the current process works. How is it fair to ask the oil & gas companies to live up to your new regulation changes, yet we do not impose such arduous regulations on other industries? If anything shouldn't everything you are imposing on oil & gas companies apply to every other surface disturbing industry in PA? If we fight for equal treatment between people, shouldn't we fight for equal treatment between industries? For the sake of brevity, here are just a few of the major flaws that make this legislation job-crushing and unnecessary:

- The regulations would create an overreach by the PA DEP into areas where it is not authorized to regulate, such as noise monitoring and placing restrictions around wildlife species. Both of these areas are within jurisdictions at levels different than the PA DEP.
- The regulations would require a total of 31 notifications which would require additional resources – both for companies and the PA DEP – to properly monitor and review with little

environmental benefit.

- PA DEP has failed to conduct a cost-benefit analysis for the proposed changes and failed to conduct an analysis of the impact of these rules on small businesses – both of which are required by law.
- These proposed changes contain various poorly-defined terms, and in some cases no definition at all, in rulemaking that will have a major impact in future operations and perhaps retroactively as well. Without clearly defined regulations, much of the enforcement will be based on interpretation rather than rules.
- The proposed regulations are too prescribed and do not allow for natural innovation within the industry therefore allowing them to quickly become outdated in light of continuing advancements in technology.

The proposed regulations are selective and targeted with respect to the unconventional oil and gas industry and are not uniform, consistent or fair relative to other industrial sectors. As such, they are far-reaching and overly-burdensome, with little to no environmental benefit.

Thank you for your time,

Bradley Boldt
212 Ewing Rd
Pittsburgh, PA 15205

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Patrick McDonnell

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