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May 19, 2015

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

2015 MAY 22 AM 9:04

RECEIVED
 IRRC

RE: Proposed Amendments to 25 PA Code Chapters 78 and 78a

Dear Members of the Board,

The Catawissa Borough Council greatly appreciates the efforts of DEP to amend Chapters 78 and 78a to improve the protection of Pennsylvania's vital drinking water resources. In particular, water suppliers with approved wellhead protection plans will be included in the notification process, the land disturbed from well development activity is included in the notification area and more stringent surface water protection measures have been proposed.

These proposed amendments are a tremendous improvement over the existing rules. However, there is still more that can be done to protect the State's drinking water resources. Therefore, we respectfully request the Board give consideration for the following comments to be included in the final rule.

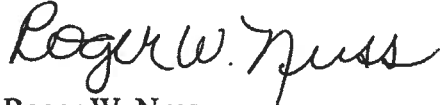
- 1) Source Water Protection Zones (SWPZs) and Source Water Protection Plan (SWPP) should replace wellhead protection zone and wellhead protection plan every place it appears in the Chapters. This will allow the inclusion of water suppliers relying on surface water sources in the notification process too.
- 2) 78.15.b.1 and 78a.15.b.1 should require that the applicant demonstrate that surface water bodies within SWPZs, as defined by a DEP-approved SWPP, will be protected.
- 3) 78.15.f.vii and 78a.15.f.1.vii and 78a.15.f.1.vi should all require that the applicant notify DEP if the limit of disturbance at the site lies within a SWPZ, as defined by a DEP-approved SWPP. At minimum, under 78.15.f, the original "vi" should be reinstated to include the notification of a water supplier with a water well, surface water intake, reservoir or other water supply extraction point that is within 1000' of a proposed well site.
- 4) 78.61 .a.4 should not allow the disposal area to be within a SWPZ, as defined by a DEP-approved SWPP.

- 5) 78.62.a .7 should not allow the disposal area to be within a SWPZ, as defined by a DEP-approved SWPP.
- 6) 78.70 and 78.70.a should include a notification to the water supplier if any brine application is proposed within a SWPZ, as defined by a DEP-approved SWPP and the brine application must prevent impact to any drinking water sources.
- 7) Brine should be defined in 78 and 78a.

Whenever possible, DEP should be allowed to assist water systems, Source Water Protection Committees and Coalitions in their endeavors to protect Source Water Protection Zones that have been deemed vital, in essence by DEP, in preventing the contamination of drinking water sources. The proposed amendments to Chapters 78 and 78a present an opportunity to formalize this assistance.

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

Sincerely,



Roger W. Nuss
Catawissa Borough Manager

CATAWISSA WATER AUTHORITY
19 Schoolhouse Road
P.O.Box 54
Catawissa, PA 17820
570-356-2172

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IRRC

2015 MAY 22 AM 9: 05

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

May 18, 2015

RE: Proposed Amendments to 25 PA Code Chapters 78 and 78a

Dear Members of the Board,

The Catawissa Water Authority greatly appreciates the efforts of DEP to amend Chapters 78 and 78a to improve the protection of Pennsylvania's vital drinking water resources. In particular, water suppliers with approved wellhead protection plans will be included in the notification process, the land disturbed from well development activity is included in the notification area and more stringent surface water protection measures have been proposed.

These proposed amendments are a tremendous improvement over the existing rules. However, there is still more that can be done to protect the State's drinking water resources. Therefore, we respectfully request the Board give consideration for the following comments to be included in the final rule.

- 1)Source Water Protection Zones (SWPZs) and Source Water Protection Plan (SWPP) should replace wellhead protection zone and wellhead protection plan every place it appears in the Chapters. This will allow the inclusion of water suppliers relying on surface water sources in the notification process too.
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Therefore, Catawissa Water Authority respectfully requests that the Board considers these comments for DEP to recognize and utilize SWPZs during the review of all oil and gas permits and brine application plans, in order to protect vital drinking water sources.

Sincerely,
Catawissa Water Authority
Terry Adams, President

Municipal Authority Borough of Catawissa
Source Water Protection Committee
P.O. Box 54
Catawissa, PA 17820
570-356-2172

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IRRC

2015 MAY 22 AM 9:06
May 18, 2015

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

RE: Proposed Amendments to 25 PA Code Chapters 78 and 78a

Dear Members of the Board,

The Municipal Authority Borough of Catawissa Source Water Protection Committee (MABC) greatly appreciates the efforts of DEP to amend Chapters 78 and 78a to improve the protection of Pennsylvania's vital drinking water resources. In particular, water suppliers with approved wellhead protection plans will be included in the notification process, the land disturbed from well development activity is included in the notification area and more stringent surface water protection measures have been proposed.

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Sincerely,

MABC Source Water Protection Committee
Howard Sodergren, Chairman