

**Hoffman, Stephen F.**

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**From:** RegComments@pa.gov  
**Sent:** Thursday, May 21, 2015 3:03 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:

Patrice Tomcik  
(patricejustin@gmail.com)  
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Gibsonia, PA 15044 US

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Comments entered:

Dear PA-DEP,

I thank you for proposing changes to the existing PA oil and gas regulations under chapter 78. This has very much needed to happen in order to protect the people who live near this industry. I live in Butler County which is in South Western PA where unconventional natural gas development (UNGD) is happening at lightning speed. About a year and a half ago Rex Energy presented the Mars Area School district with a lease agreement to drill underneath the 5 campus schools (all in one area) where my two son's ages 8 and 10 go to school along with 3,200 of their friends. The Geyer well pad was to be placed 1/2 mile from the 5 campus schools. I desperately started researching UNGD looking for reasons why this would be O.K. to be conducting near and underneath my children. I could not find any peer reviewed studies published in reputable journals that demonstrated that there are no short term or long term health effects or safety issues from UNGD. Instead, I found a large amount of peer reviewed studies published in many academic and medical journals about the clear dangers of UNGD. I then found other parents who were just as concerned as I was about this industrial process occurring so close to where our children spend a large part of their lives and would potentially be exposed to so many health and safety risks. Thus, the Mars Parent Group was formed and we have been asking for a 2 mile no drill zone around the schools. We have scientific data to back up our request because I actively reached out to those who are experts in the fields of UNGD - Jerome Paulson, MD, FAAP Director of the Mid-Atlantic Center for Children's Health & the Environment; David Brown, ScD, Toxicologist, Environmental Health Consultant, Beth Weinberger, MPH, PhD, Research and Communications Consultant, Southwest Pennsylvania

Environmental Health Project, and Samantha Malone, MPH, CPH, Manager of Science and Communications FracTracker Alliance. These folks were kind enough to educate me and send me various PowerPoint presentations that they had created and I merged them into one. Mars Parent Group (MPG) sent this PowerPoint to all of our local government, school board members, state representatives, and the DEP. <http://www.marsparentgroup.com/> The PowerPoint message is very clear that there are inherent risks with UNGD and placing it so close to where people live, work, play, and go to school can have deleterious health and safety effects. Therefore, I support and am asking for the following protections for my family:

1. Standards for frack pits and impoundments

- Prohibit operators from using ANY open-air pits and tanks, regardless of size or location, for storage and treatment of regulated wastes,
- Require all waste impoundments to be properly closed immediately upon the effective date of the regulations.
- Require that tanks used for the storage of waste be completely enclosed

2. Definition of public resource

- Schools should be added to the list of public resources that require additional consideration when permitting oil and gas wells and longer setbacks of waste storage from school buildings, parks, and playgrounds. The proposed 200ft set back is an arbitrary number and does not give enough health and safety protection to children which are a vulnerable population. A very recent study has shown that people living or working near active natural gas wells may be exposed to certain pollutants at higher levels than the Environmental Protection Agency considers safe for lifetime exposure. Air pollution from fracking operations may pose an under-recognized health hazard to people living near them, the researchers concluded. At a mile away the hazardous air pollutants were decreased by only 30%.

<http://www.sciencedaily.com/releases/2015/05/150513093611.htm> DEP should require, at minimum, a one-mile setback of oil and gas wells, waste storage facilities, and any other infrastructure from the property boundary of any school property.

3. Identification of orphaned and abandoned gas and oil wells

- Identify existing wells through onsite inspection before site and well construction and drilling so that the location of a new well can be changed if needed.
- Plug and seal or otherwise appropriately address abandoned and orphaned wells according to state safety standards prior to new well site construction.

4. Separation of unconventional and conventional regulations:

- End the use of all open-air production pits for the storage of waste and immediate conversion to closed tanks.
- Develop water management plans that specify the source and volume of the water used in site construction, drilling, hydraulic fracturing, and site restoration.
- Prohibit the road-spreading of brine.

5. Transparency and access to information

- DEP proposes to require oil and gas operators to file permit applications and required reports electronically.
- DEP should also make sure that all electronic filings and reports made by operators are also available to the public on DEP's website on the same day they are deemed complete by DEP.

Thank you,  
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