

Hoffman, Stephen F.

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:

Dan Doyle
(reliancewellservices@gmail.com)

, PA US

Comments entered:

Dear DEP,

Last year my company, Reliance Well Services (a hydraulic frac company) was running nearly 30 open hole jobs/month for operators ranging from those with very solid HSE programs down to operators who needed every bit of help we could give them. We have a no water on the ground policy and supply our personnel with all the equipment and training needed to reach this objective on every job. We hold the same standard for all customers and have never had an operator incur an NOV as a result of our practices. This makes for good marketing so when we hear of changes to DEP operating procedures there is some concern, but more with an eye towards compliance than outright objection for the sake of objection (objections are only raised when small results come with big costs). That said, I've taken the time to outline simple procedures that are not very costly but that are exceptionally effective when fracing open hole wells.

What we try to encourage:

Sufficient pit depths especially if a dusting permit is in place for the driller. Too often pit capacities are non-existent after the inclusion of drill cuttings. It adds very little cost to oversize pits in terms of depth.

Backstop pits. Soil removed can be used to backstop and catch flush water. Because joint lengths are 30' or so, a good backstop of 8' to 10' of piling is sufficient to catch the flush.

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Inclined fairway. Ponding around the wellhead and the potential for leaks that comes with it can be alleviated by sloping the ground from the wellhead to the pit.

Double Lining. Tears are common at the wellhead so we encourage operators to use two layers of 20 mil plastic around the well head and fairway to the pit. This is essential given that locations are made up of angular shale that rips into the liner as soon as you step on it. Also, gravel from plug back will tear into the liners for the same reason.

Pits liners should be a double though a single liner along the backstop is sufficient as it is a deflector only. Also, backstops should be staked in place so they don't slide down. No service company should ever penetrate a liner with a stake on a horizontal plane.

Back up trash pump. I can't count the number of times we've seen transfer pump failures. Good practices and a back up will keep the water level below the 24" of freeboard requirement.

Tape the liner to the well casing. Liners should be fitted over the wellhead and taped to the casing so that a watertight seal is achieved. Plenty of slack should be built in so that the liner is not taut and susceptible to tearing.

Do not spin the flush ell. A lot of rig operators will spin the frac pipe as they flush in when encountering resistance or due to hole conditions. They shouldn't. This is the fastest way to saturate a location with brine.

Build liner dykes with corrugated pipe, not hay bales. Hay bales deteriorate and collapse leading to an overflowing liner when ponding occurs. A 12" corrugated pipe dyke is cheap, reusable and it holds up. It's not a bad idea to encircle the pipe boat (which should be on wheels and not skids) and the rig.

Frac companies should vac water from all hoses, manifolds and the blender tub at the end of the job. Reliance installs tees with bleeder valves on all suction lines for this purpose. It requires the use of a vac truck at the end of the job but it takes only a few minutes and will result in dry hoses. The practice among some frac companies is to dump hoses and the tub on location. We don't allow this.

All said, the above practices add very little to a well's cost. Add in a conscientious rig and frac crew and locations are easy to keep dry.

I hope this helps.

Dan Doyle
President

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Patrick McDonnell