

**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:

Shellie Northrop  
([shellie.northrop@gmail.com](mailto:shellie.northrop@gmail.com))  
124 Frances Street  
Sayre, PA 18840 US

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Comments entered:

May 19, 2015

Department of Environmental Protection  
Policy Office  
400 Market Street  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
[www.ahs.dep.pa.gov/RegComments](http://www.ahs.dep.pa.gov/RegComments)

To Whom It May Concern:

I live in Bradford County, one of the most heavily drilled counties in our Commonwealth. I would like to thank you for the opportunity to comment on 25 Pa. Code Chapter 78 and 78a proposed regulations.

78a.1 Definitions

I support the definition for "Other Critical Communities" and "Threatened or Endangered Species. In particular, the definition of "Other Critical Communities" is important as politics are overruling science in the listing of Threatened or Endangered Species.

78.15, 78.57, 78a.15, 78.57a

I support schools being added to the definition of public resource and that a notification zone of 200' "within common areas on a school property or playground" has been created. However, 200' is inadequate. This zone should be increased to 0.5 mile with regards to these resources. It should also cover "resources" that involve other susceptible populations, such as hospitals, day care centers, and nursing homes. The setbacks should also be increased to 0.5 mile.

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78.56, 78.57, 78.58, 78.59, 78a.57a

Regarding standards for frack pits and impoundments, it is a start that production pits are prohibited at shale gas well sites. This has been a major source of pollution resulting in very large fines. However, the same risks for pollution exist at conventional sites when these are used. Both conventional and unconventional well sites should be covered. Closed loop systems should be used for the storage and treatment of waste, including wastewater, drill cuttings, and production fluids. Permitted Central Tank Storage is an improvement over open impoundments. Any tanks for storage should be completely enclosed.

Allowing operators three years to properly close waste impoundments or bring them into compliance with construction standards for residual waste permits is too long. This should be shortened to half a year, one year maximum.

78.52a

Requiring the identification of location of old wells before drilling new ones is important. However, this should be done before site and well construction, not just before drilling. This allows the location of the new well to be changed in order to provide for increased safety. Orphaned and abandoned wells should be properly plugged and sealed before new well site construction as these can be a major contributor of methane migrations, which has occurred even before fracking is begun.

78a.51

Regarding protection of water supplies, I support the clarification that a water supply must be restored to either the better of pre-drill conditions or Safe Drinking Water Act standards.

78a.41

Regarding noise mitigation, these provisions are a good starting point. However, these provisions should cover current locations as well.

Finally, the DEP wants O&G operators to provide reports and applications electronically. These electronic filings should be made accessible by the public within 1 week of their filing.

Sincerely,

Shellie Northrop  
124 Frances Street  
Sayre, PA 18840

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Patrick McDonnell

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