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CITY OF DuBOIS, PENNSYLVANIA

2015 MAY 25 AM 9:41

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Office of the City Manager
Department of Administration & Finance

DEP Policy Office
400 Market Street
P.O. Box 2063
Harrisburg, PA 17105-2063



Dear DEP Policy Office,

The City of DuBois Council, Mayor, and City Manager submit this letter requesting the DEP further research regulations on citing disposal injection wells, especially surface conditions. Thank you for the opportunity to comment on the updating of our Oil and Gas Regulations. We agree there is a need to better protect our water resources and environment. The comments we present cover the specific regulations found in sections 78.51; 78.52; 78.56; 78.57; 78.58; 78.59; 78.60; 78.61; and 78.62.

Our area residents have been working and collecting information on disposal injection wells in our local area. It has been found that the surface conditions of disposal injection wells need improved regulations. A binder was provided at the DEP & Environmental Quality Board (EQB) Public Hearing on January 23, 2014 with all the information locally collected, which is extremely relevant to protecting Pennsylvania's water sources.

DEP depends on the permitting of disposal injection wells by the EPA. The EPA deals only with underground sources of drinking water and residents found no way to protect above ground water sources. Our local coal mines are of great concern, which are located near the proposed site and extend under the City of DuBois into Sandy Township and many other municipalities throughout our area.

Residents also had concerns with protection of private water supplies, cost to check water sources regularly, roads, air quality, soil, loss of property values and much more. The DEP needs to review all this information collected by private citizens on potential hazards to Pennsylvania water supplies from waste disposal. Anything happening underground really is an unknown and loss of water to homes is one of the most important items to home owners and to protecting the home owners' property values.

Please ensure that future regulations will identify existing disposal injection wells and make sure that the regulations plug and seal old abandoned and orphaned wells appropriately prior to new well construction to prevent pollution from accidents. Please prohibit disposal injection wells in Pennsylvania near residential areas or water supplies, since history shows this waste can travel over five miles underground. Operators should be required to do pre-drill water quality testing

and make the data publicly available. If contamination of a water source should happen the operator should be required to restore the supply to pre-drilling quality. The driller should also be required to provide a sufficient bond that will provide water for residents if contaminated and not just plugging costs. A comprehensive monitoring plan is also necessary with all the old gas wells and coal mines in Pennsylvania.

The City of DuBois stated concerns to the proposed disposal injection well on Highland Street Extension, DuBois, PA because of the proximity to our watershed and the abandoned gas wells (not City owned) with deteriorated casings. "Undue pressure from injection activity could push fluids along the fault lines into abandoned gas wells with the potential to contaminate underground sources of drinking water." Our area has faults and additional studies should be done due to all the problems in our nation with disposal injection wells and increased risk of earthquakes. History has shown fluids moved in Erie from an injection well as far as five miles away and no new standards or casings protect where the fluids will travel over time below the surface once they reach the injection zone especially when known fractures and faults exist.

In our own area, six deep wells are already surrounding the quarter mile area of review at the same depth as the proposed disposal injection well, which is just outside the EPA area of review. Two area residents cite that their water sources are affected by one of the deep gas wells already and yet they are right outside the area of review. Even displacement of brine or underground fluids could quickly and easily contaminate these residents' private water sources.

Parts of our City and much of the surrounding area are built atop a catacomb of old coal mines no longer worked. The City and state have spent considerable amounts of taxpayer money to clean-up the mine discharge that polluted Sandy Lick Creek which flows through DuBois.

Simply put, geologic and hydrological conditions in this area make the proposed site of a disposal injection well an egregiously poor one for such a well. This residential area depends on private water wells and is unable to afford or accept any risk. The DEP needs to provide protection for residents and municipalities.

Sincerely,



Gary Gilbert
Mayor



Diane Bernardo
Councilwoman



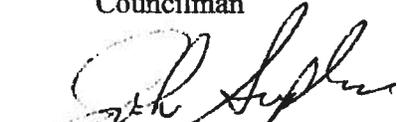
James Aughenbaugh
Councilman



Randy Schmidt
Councilman



Eddie Walsh
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John "Herm" Suplizio
City Manager