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Department of Environmental Protection
Policy Office
400 Market Street
P. O. Box 2063
Harrisburg, PA 17105-2063

Re: Chapter 78a. Environmental Protection Performance Standards at Oil and Gas Well Sites;
Advance Notice of Final Rulemaking

To Whom it May Concern:

As a Forkston Township Supervisor (Wyoming County), EMA Coordinator and a conservationist, Pennsylvania Federation of Sportsmen Clubs Wyoming County Delegate and Mehoopany Creek Watershed Association Vice President my concerns are many regarding unconventional natural gas development.

Personally, I'm about 1 ½ miles from the nearest well pad. Our township also hosts locations for a compressor station, well pad, gathering lines and the Mehoopany Windfarm. Many of the turbines are located within our municipality. Forkston Township has considerable acreage that is encompassed in SGL57. In a short few minutes' drive from my home I can be at numerous well pads in neighboring North Branch, Windham and Mehoopany Townships. There has been one well drilled which has been restored within our township and there are two more proposed well pads.

The DEP is defining and creating regulations regarding critical communities. Presently, there are two large diameter, high pressure gathering lines within our township which have been routed through the timber rattlesnake's habitat. I've been extremely concerned about that and that the fact that the public had no input in that permitting process. In fact, this area previously was the largest contiguous timber rattlesnake habitat in Pennsylvania. There has been so much disturbance in that area to accommodate energy that I am wondering how exactly our timber rattlesnakes are faring. Is that area still considered contiguous? Has their habitat been truly protected? What are the long term ramifications of destroying their dens?

Because the development has not been as concentrated as in other nearby townships, our experience with well pad development has been minimal. However, that does not lessen my concerns in any manner.

As a township EMA Coordinator and first responder with the FWM Fire Company, in the case of an emergency at the Mehoopany Elementary School, I will be among those that respond. Therefore, 78a.15 (f)(vii) I strongly support the addition of the notification zone for schools and playgrounds. I feel that the notification zone would be better served by extending it to 1,000 feet. I see a benefit for schools and playgrounds being adequately notified because as a

first responder, we are going to need to promptly evacuate the school and close roads. We are going to need to secure the site in order to keep the public at a safe distance and tourists away from the area. I'm not convinced that the 200' notification zone is adequate considering at present, our FWM Fire Company has no documented incident action plan. We do have experience fighting a fire at the school, and we know our area. It is just uncertain with the parcel size the school is located (20 acres) whether there that 200' will be sufficient from the point of public safety. It may be relevant that the FWM Fire Company should be consulted during the permitting of a well pad that would be within 1,000 of the school building, playgrounds or common areas.

I recommend that hospitals be added to the list of public resources. In case of an emergency, there would be many people to evacuate. The DEP needs to have the authority to create a condition regarding hospitals. Hospitals need to be included with the notification zone.

78a.41 I strongly support the addition of noise mitigation for well pad locations. I have friends that have been dealing with a very difficult situation during drilling and fracking events next to their home. Indoor noise levels from the pad have caused sleeping difficulty for them. Please extend these provisions to existing well pads so my friends may be relieved of this situation. As a township supervisor, if one of our families had this incredible situation, I would be at a complete loss to help them. Our township is very rural having a small population of less than 400 residents. We also have many people that own cabins here who have a variety of opinions regarding gas drilling activity. Lacking local regulations, there is really not much we can do. Considering our rural population and that most of our township is SGL57, we really lack the ability to take on zoning. There needs to be a way to measure indoor noise levels at a home being affected especially at night when the DEP is unable to quickly respond to a complaint. I suggest the operator be required to install a meter to record indoor decibel levels during operations. The levels need to be recorded at all times and available to both the DEP and the family. The device needs to be properly calibrated.

78a.57a I strongly support the addition of the new section, Centralized Tank Storage. Permitted tank facilities replacing open waste water impoundments are a reasonable approach in the drilling fields. The drilling operator currently drilling within our township utilizes flowback impoundments in both Susquehanna and Bradford counties. I was concerned at the possibility that landowners might agree to this structures within our rural community. I'm really pleased that the DEP has determined to phase out those structures and replace them with centralized tank storage. Tanks are a superior method to storing flowback and produced waters during recycling operations as compared to open waste water impoundments. I find the noted setbacks reasonably comparable to other established setbacks. Please ensure the proposed regulations at a minimum, move forward in the final regulation.

I have concerns regarding the definition of "abandoned water well." I would caution that it is extremely important that the landowner be involved in determining whether or not a water well has been abandoned. Our township's residents were very affected by the 2011 floods of which were nothing short of disaster here. We lost over 20 miles of roads and several bridges.

Some of our residents were months trying to get their homes livable again. During this time, some had water wells affected. They had to pull their electric components and pumps. Some of these water wells were associated with cabins. At this point in time, I can't say whether every property has restored their water wells to working order. Rebuilding after two floods during 2011 has been very difficult for some families. Those with cabins lacking insurance are especially slow and reclaiming their property back to pre-flood conditions. While those water wells may be considered 'abandoned' by the definition, to those families who may intend to place them back in service at some point, they are not abandoned. They are an asset. They particularly are a very important asset adding value to the property should they choose to sell. It may cost anywhere from \$3,000 - \$10,000 or more to drill a water well here. Retrofitting that existing water well is a more viable option.

Thank you for providing the opportunity to comment. This is an important rulemaking that directly affects where I live and our rural community. These additional performance standards help to balance operations in my community in such a way that they are more balanced for all stakeholders.

Best Regards,

Dennis Mingus
109 Wild Turkey Lane
Forkston Township, PA 18629