

3042

RECEIVED
IRRC

2015 MAY 25 AM 9:42



May 14, 2015

Attn: DEP Policy Office
400 Market St.
P. O. Box 2063
Harrisburg, PA 17101-2063
RegComments@pa.gov

To: DEP Policy Office
From: James D. Powell
176 Ashmore Rd.
Washington, PA 15301
JDP710@VERIZON.NET
724-228-0754

Re: Revisions to the Environmental Protection Performance Standards at Oil and Gas Well Sites (Chapters 78 and 78a)

I am taking this opportunity to comment on the Advance Notice of Final Rulemaking of the Environmental Protection Performance Standards at Oil and Gas Well Sites (Chapter 78 and 78A).

I whole heartedly support the changes proposed in this current version of the proposed rule enhancements. Some areas even need more strengthening. Living in the middle of Washington County PA I can say with certainty that these rule changes are long overdue.

The DEP needs to consider:

1. Implement and enforce more stringent noise control measures. (Drilling, pipeline, truck traffic)
2. Implement a rapid response protocol for those whose water supply is compromised by any process used in drilling for gas and oil.
3. Stop the use of open pit storage of toxic contaminants. These structures are KNOWN to leak.
4. Require the discovery, listing and remediation of abandoned unplugged oil and gas wells, not only near new drilling pads, but also including all areas of lateral drilling and fracking. Hydraulic fracking presents a real and present danger to rural water supplies. These wells, many unknown only to GOD, because of the lack of documentation must be found no matter the time and energy required for there discovery.

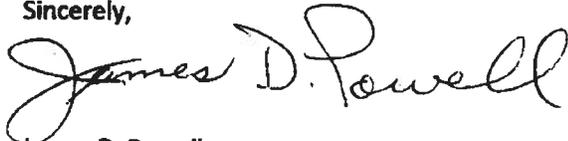
On 2-28-1989 EPA Administrator William K Reilly signed a remand of an underground Class II injection permit for oil recovery wells. (UIC Permit Application #PAS2R2225BWAS UIC Appeal No. 87-3) The remand deals with the recognized fact that abandoned unplugged wells are open conduits to upward migration of toxic substances into our water supplies.

There is no individual who can state with CERTAINTY that the Marcellus formation is a solid monolithic layer with no abnormalities from geological events of the distant past or even events of the present day. When one considers the enormous pressures used to frack the formation regulations must be

implemented to prevent these abandoned unplugged wells from becoming quiet paths of aquifer pollution.

Thank you for the opportunity to comment. WATER IS LIFE.

Sincerely,

A handwritten signature in cursive script that reads "James D. Powell". The signature is written in black ink and is positioned above the printed name.

James D. Powell