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PA Environmental Quality Board
P.O. Box 8477
Harrisburg, PA17105-8477

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Dear Honorable Board Members,

Good evening. My name is Joe Thompson. I am a third generation representative of a family business that has been in continuous operation since 1947. We are conventional producers of shallow oil and natural gas located in Northwestern Pennsylvania. We have enjoyed several booms and we have suffered as many busts but we have always persevered and lived to fight another day. Today, when I speak to my father and my grandfather about the current climate of our industry they are less confident about its' future than they have ever been. Where, in the past, there had always been a gleam of cock-eyed optimism, today there are dark shadows of doubt. It's not solely the downturn in commodity pricing. Markets ebb and flow. No, this prickly uncertainty results from the seemingly endless onslaught of new and revised regulation being imposed on our conventional industry by the DEP.

When I read the proposed regulation changes to Chapter 78 by the PA DEP I am forced to ask the following questions:

What has changed in the operations of the conventional Oil and Gas Industry in Pennsylvania since the 1960's? Nothing! If the way we operate has not changed, why then are the regulations which were promulgated in 1985 and updated in 2001 no longer adequate?

When we, as an industry collective, implore the DEP to share with us what scientific and empirical data they have gathered to justify these proposed changes what have they shown us? Nothing! Instead they prey on the emotions of the citizens of Pennsylvania by publishing photos of spills that are already violations under the current regulations. Why impose more regulation when they cannot effectively enforce those currently on the books?

When we, as an industry of small mostly family-owned businesses ask what alternatives or exemptions for small businesses have been considered in incurring costs of \$1.5 billion in implementation and then hundreds of millions of dollars per year ongoing to maintain the proposed Chapter 78 changes? Their answer: nothing! When asked to recognize the devastating financial implications of their proposals our protestations fall on deaf ears.

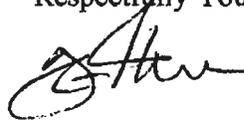
The spirit of the bifurcation of Chapter 78 was meant to regulate the Unconventional and Conventional Oil and Gas Industries separately; the conventional industry via Act 223 and the Unconventional Industry via Act 13. Instead, the PA DEP has executed a word processing exercise in giving us two identical sets of regulations labeled "Chapter 78" and "Chapter 78-A." They laugh in the face of our State Legislatures who saw the need for bifurcation and worked hard to push it through. The DEP scoffs at our conventional industry as uneducated rural roughnecks and work to implement unattainable regulation as a sort of retribution for our audacity in trying to save our jobs and maintain our rich heritage here in Pennsylvania.

There is no question that the protection of the pristine waters and natural resources of our Commonwealth is a noble endeavor. We, in the conventional industry are stewards of the environment. Yet we are labelled as "criminals" sight unseen by many in the DEP Offices in Harrisburg. If our activities in the conventional oil patch are so detrimental then why are the fresh water aquifers, streams, creeks, and rivers that course through Warren, McKean, Venango and Forest Counties among the most exceptionally valued and highest quality in the State? The mighty Allegheny River is an artery that the oil patch follows directly from Bradford to Butler; a national symbol of wild, uncontaminated beauty.

Ours is a cottage industry composed of small, family-owned and operated businesses located in the rural, economically depressed counties of Northwestern Pennsylvania. We employ the men and women from communities unknown to many: Titusville, Pleasantville, Oil City, Bradford, Warren, Sheffield, Kane. In many of these communities ours is the only industry left. We manage shoestring budgets and invest what slim profits we make into our employees or back into our businesses. We aren't J.R. Ewings or Daniel Plainviews. We are the people you bump into at the grocery store. Your kids are on the same soccer team as ours. Don't confuse us with the Chevrons, Shells and Senecas of the Marcellus and Utica Shale-plays. We are the local hardware store. Why treat us like Wal-Mart?

Pennsylvania's Conventional Oil and Gas Industry is the oldest of its' kind in the world. That legacy is threatened now more than it ever has been. Our industry deserves its' own set of regulations. Those regulations were written in 1985 and updated in 2001 and they work. Give them back to us, as written, so we can do what we do best; work.

Respectfully Yours,



Vice President
Drilling & Operations
Devonian Resources, Inc.

In the State of Pennsylvania, the drilling and development of 8 to 10 oil or gas wells on a lease may cause more than 5 acres of land to be considered "disturbed". If an operating company disturbs more than 5 acres of land on a single piece of property they may be subjected to violations, excessive fines and total work stoppage. If a company wishes to disturb more than 5 acres, or even anticipates it will disturb more than 5 acres, they must go through a long and costly process of applying for and completing what is known as an ESCGP-2, also called an Erosion and Sediment Control General Permit. In several cases where such a permit has been granted, the actual expenses for the permit alone have totaled over \$20,000. This includes detailed mapping, survey work, engineering and geology planning and fees. The actual execution of the ESCGP-2 in the field is based on the regulations derived from the faulty logic of faceless regulators with absolutely no experience in the oil & gas industry. This is self-evident from examination of the document itself. The ESCGP-2 permit was based on and created for the recent increase of development of Marcellus and Utica wells while completely ignoring the best practice standards of 150 years of experience of local oil and gas developers. The ESCGP-2 permit calls for the creation of a storm water runoff system by constructing collection ditches, some of which may need to be a half mile or more, that would ultimately result in a much large impact to the natural environment and alter the existing drainage of the land. These environmental considerations of conservation and natural water movement are fully addressed in the existing Erosion & Sediment Plan that is created and followed for every single well on any lease developed within the Commonwealth. To attempt to actually implement an ESCGP-2 plan in the field has cost local developers an additional \$60,000 for a ten well project. Even with all the advanced planning there is no guarantee that a company will find economic oil or gas deposits which will result in wasted money, time and effort.

There are laws on the books in the State of Pennsylvania that were placed there to protect the small business person. The Pennsylvania Department of Environmental Protection has totally ignored these laws and refuses to take into

consideration the economic impact of such needless regulations on our local industries. If they actually knew the business that they regulate the ESCGP-2 plan would not exist. High ranking officials within the ranks of the PA DEP have vowed to never remove the ESCGP-2 permit from the DEP's requirements. This also flies in the face of the recent bill that was created by State Senator Scott Hutchinson which forced the DEP to bifurcate or separate the unconventional regulations covering Marcellus wells from the regulations more appropriate for shallow or conventional wells. By refusing to separate regulations the DEP itself is in direct violation of the Laws of the Commonwealth. Instead, since the election of Govenor Tax'em Tommy Wolfe, the DEP has fired the Technical Advisory board responsible for evaluating new proposed regulations and attempted to force through ludicrous and seemingly vindictive regulations which has personally violated any trust that I have ever held for the PA DEP.

As a group, the people that have assembled here this evening are not looking for a hand-out, they are not looking for a government program. They are simply looking for fair and equal treatment under the law. They are hoping be able to continue in a business that helps runs the very infrastructure of the Nation, a business that many have inherited from their Grandfathers and wish to pass on to their Grandchildren. Pity the day when mindless over-regulations take the food from the tables of honest working Americans.

My name is Stephen Vanco. I am a Warren County Commissioner and a 40 year farmer in Warren county. My wife and I own OGM rights on some of our land and some we do not. We have five conventional gas wells on our farm. While they produce a very modest income, they contribute to the local economy.

Northwestern Pennsylvania has one hundred and fifty years of experience with oil and gas wells beginning with Drake's Well in 1859. The second well was actually drilled in Warren county. Most of these wells are operated by family businesses that may span several generations. These families live and work in the areas where these wells are located. Their concern for environmental stewardship is important to them in their daily operations as they affect the health of their families, neighbors, land, and water.

While oil and natural gas have had a tremendous economic effect in northwestern Pennsylvania, the cost has been very little in environmental harm. The Allegheny National Forest comprises 513,000 acres; and approximately 92% of the OGM's are privately owned. The ANF is located in the heart of Pennsylvania's conventional oil region, with Drake's well located 15 miles from the western edge of the forest. The ANF remains a major producer of conventional oil today, supplying much of the crude oil for products refined at Bradford's ARG refinery (the world's oldest continuously operating refinery employing about 400 people.) Today's estimate is about 12,000 conventional wells currently in production in the ANF.

Despite the long history of heavy conventional drilling, the trees and streams have prospered. Of the 2126 miles of mapped streams within the ANF, fully 72% are rated as high quality or exceptional value for water quality, among the highest quality streams in the state. Multiple studies on water quality since the early 1980's do not detect a negative impact to water quality from the wells.

Most of the conventional oil and gas wells in the region do not generate a large income

individually, but collectively they make a huge contribution to the local economy. Not only does the industry support hundreds of jobs that pay well above average wages, but it supports many other jobs to meet the needs of the workers and their families. These hundreds of families support stores, gas stations, school teachers, barbers, health care workers, in fact the whole community. All new wealth springs from the earth and the land through farming, mining, and drilling and manufacturing. Otherwise, dollars just change hands without new dollars being added. It is said that a dollar generated in a rural community multiplies several times, as much as seven times, before it leaves the community. The wealth is indeed shared by all.

I don't have Warren County's figures, but they are very similar to the numbers in neighboring McKean County. A study in that county shows that their conventional producers and their associated drilling and completions contractors accounted for 2017 jobs in 2011. Those jobs averaged \$78,954 per year – twice the county average income. Warren County's numbers would be similar.

The high grade Pennsylvania Crude is only processed by two refineries now. This Penn Grade crude oil is manufactured into lubricants, waxes, and pharmaceutical and cosmetic base stocks. It is a small but important line of products. Without the continued production of conventional oil wells, these refineries would have to close or retrofit to process asphalt-based oils into different products.

Bradford's refinery, ARG purchases Penn Grade crude oil from conventional wells in northwestern PA. In 2013, they purchased \$194,000,000.00 of Penn Crude. The Annual direct economic impact to the area was \$268,600,000.00. The indirect impact was multiplied several times in the community.

This is a lot of money paid to the producers. But, most of the conventional wells in this area are operated by small independent companies. The individual wells for the most part don't produce high incomes. The small companies are efficient and make a good living for the owners and employees, but the income does not support the high cost called for in the new regulations. These costs would force many or most of these companies to go out of business.

The small family oil and gas companies cannot afford to implement the changes called for that are necessary for unconventional deep well drilling and fracking. The conventional wells do not generate enough income to support it. If these companies are forced to close down production, the economic impact to northwestern PA and Warren County will be staggering. With the loss of these jobs, residents will be forced to seek jobs elsewhere and all of the businesses in the community will feel the impact.

We have one hundred and fifty years of history to prove that these changes are not necessary for conventional wells. It was not the intent of legislators to impose these restrictions on conventional wells and they are not needed. If they are mandated, the effect on our community will be devastating.

Testimony by Stephen Vanco

Source for figures of McKean County is

**Regulatory Analysis Form – Oil & Gas Surface Activities-Amendments to 25 PA Code Chapter 78,
Subchapter C, McKean County Impact Assessment
David Stein**

My name is Brad Bawden. I am a Well-tender at Cameron Energy Company. We produce conventional oil and gas wells. My wife and I have two kids together. My job at Cameron supports my family. Every year my production declines due to the natural depletion of an oil well. In order to stay employed, my employer drills several new wells a year enabling me to continue to have full time work. If new wells cannot be drilled my job evaporates with the depletion of oil wells.

The regulations we are testifying about will lead directly to that evaporation of my job. It will not be realistic to drill new wells under these regulations. These regulations will bring large new costs that are not necessary. One of the worst costs in the 2015 changes is about stormwater management. We would now have to think about our well sites as though they were Walmart parking lots and hire experts for thousands of dollars to do calculations that are silly for our small sites. We already bring our new well sites back to vegetation right after they are built. It is wasteful to require all this paperwork and expert's study, and it is those very kinds of costs that will put us out of our jobs.

I am very disappointed the DEP did not take into consideration that my employer and all of the oil and gas companies in our community are small businesses. The DEP should have looked at alternatives for small businesses because it is what the law requires and because it makes sense. What we do now with our roads and locations works well. I see those roads and locations every day, and regardless if it's raining or the snow is melting, we are not having the kind of impact these complicated regulations are geared toward.

My family and I are already worried about the effects of low oil prices. Lots of my friends from other oil and gas companies are already laid off. Our industry is already struggling and the way you have approached the regulations doesn't show any concern about the financial impact. In fact, I could not find any financial estimate from you about your stormwater requirements.

I strongly urge the DEP to stop and do the financial analysis and to stop and look at alternatives for small businesses so that the end result will not create the loss of job for myself or the loss of work to any of my fellow employees. Thank you.

Jan T. Hendryx, DO
4409 Ellsworth Avenue
Erie, PA 16509

April 30, 2015

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

Re: Proposed Oil and Gas Revisions of 25 PA Code Ch. 78, 78a *Rulemaking*

Dear DEP Members:

My name is Jan Hendryx. I am a physician and Erie, PA, resident. I am extremely concerned about public health and environmental issues resulting from unconventional shale oil and gas development. I submit this verbal comment on behalf of myself and all citizens who may be directly, indirectly or potentially affected adversely health wise.

The proposed new oil and gas regulations state that the purpose of this update is four-fold. In my opinion: "1. Ensuring protection of public health, safety and the environment" is the *first and foremost duty* of the PADEP, EQB, legislators, state executive branch, PA Department of Health and the oil and gas companies. In my opinion, these are empty words as the actions (or lack of actions) of you as individuals or your groups speak much louder. Unconventional shale development has been on-going in Pennsylvania for over a decade now, and you ALL have done next to nothing to protect the citizens from the public health menace created by this industry. The current proposed OG revisions continue to perpetuate this pattern of irresponsibility and compromise your duty to the public.

In what ways?

1. *Adequate setbacks* from unconventional development are not delineated in the new rules. Setbacks from homes, schools, universities, and hospitals should be at least one mile from the well site pad, impoundments, lateral well trajectories, compressor stations and pipelines. This would minimize potential exposure to and adverse health effects from air and noise pollution originating from diesel trucks, heavy equipment, compressors, drilling/hydrofracturing, venting/flaring, explosions, frac sand, hydrogen sulfide, ozone, small particles, volatile organics, radon, and methane migration. It would also decrease the possibility of pollution of fresh drinking water sources from drilling activities, fracking, radioactivity and spills.
2. There should be no land spreading, spraying for dust suppression or de-icing using brine and post-production fluids at all. All you are doing is providing a legal way to justify getting rid of toxic wastes by dumping them in the environment. They still get into the land and watersheds.

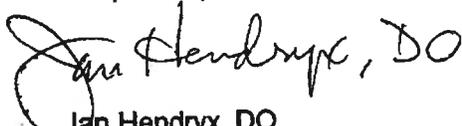
3. Dumping of both conventional and unconventional residual frac waste into our rivers, streams, and on our lands needs to be stopped now! People who get their drinking water and recreate downstream from the facility across the river would appreciate such actions. You really need to figure out ahead of time how, when and where to safely dispose of the billions of gallons of post-production waste fluids and radioactive drill cuttings before allowing any more development. Especially when future projection is 100,000 plus unconventional wells.
4. You need to mandate that all wastewater trucks be equipped with a GPS device and monitored from a central non-government computer location to assure that they are not dumping illegally into streams in the middle of the night or at POTWs.
5. Drillers should be mandated to use individualized non-toxic tracers in their drilling solutions, frac fluids and water (mine drainage, treated sewage effluent or freshwater) so there is no doubt who and where the pollution is originating from.
6. Pre-drill and post-drill water testing needs to be mandated at a Tier 3 level so that any potentially impacted individual has data about heavy metals, radioactivity, specific volatile organics and other chemicals that may be poisoning them.
7. Air monitoring should be performed near all sites and inside homes for 2.5 and 10 micron particles at least. Volatile organics should be monitored specifically. Plumes of air pollution can travel a couple hundred miles and are a significant potential health threat.
8. No unconventional development should be permitted within a mile of abandoned and orphaned wells as communication from the hydrofracturing process can cause massive pollution of the environment. That is, unless the oil and gas company and DEP can verify all wells have been plugged appropriately and there is zero chance of a pollution event unfolding.

Specific definitions of certain terms that need to be added in order to understand the regulations include: brine, flowback, produced waters, properly closing a pit, centralized impoundment and alternative waste management. What does the term "regulated substances" mean? Are unknown toxic proprietary chemicals exempt from this term?

Ultimately, I am an advocate of completely banning unconventional shale development and associated fracking for the many reasons our neighbors in New York State have so adequately and intelligently delineated.

Thank you for your time.

Respectfully submitted,


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Comments on Chapters 78 and 78a
As Provided Under the Advanced Notice of Final Rule Making
Warren County Courthouse
April 30, 2015

My name is Burt Waite and I am a consulting geologist in Pennsylvania and I work in Meadville, PA. It is understood that the Department did not have to follow the Advanced Notice of Final Rulemaking procedure, but did so to allow additional review and comment from all interested parties. For this we are appreciative.

The regulatory process is challenging at best, but this Chapter 78 (Subpart C) process has been made even more so.

- Sweeping regulatory changes are proposed to an industry that has been effectively regulated for decades.
- A new and magnificently productive new play has been proven. We call this the Marcellus/Utica and it is a game changer and this was the impetus for a new regulation package.
- There is huge public and stakeholder interest in this package as evidenced by 24,000 +/- comments. This is unprecedented.
- This process is ripening as the IRRC deadline approaches so there is now a time crunch approaching.
- Parts of Act 13 were ruled unconstitutional and are under serious legal review and we all wonder when and where it will end up.
- The legislature required bifurcation of the Conventional and Unconventional operations leading to a hasty separation of the two sides of the industry.
- A new administration has taken control.
- The long standing TAB was severely shaken up and all new members appointed and the make-up of TAB modified.

- A new advisory committee was formulated and is getting its feet on the ground.
- This is all happening when the economic health of the industry is in peril and conventional activity is down by 80% and unconventional activity is down some 30% and continues to drop.

It would be wonderful if we could all take a deep breath and regroup, and while that does not appear likely, that is exactly what I am suggesting to you here tonight and I will offer both general and specific comments to that point.

General:

- The current draft of the regulations goes beyond the words and the intent of Act 13 with respect to conventional operations.
- The current regulations largely ignore the intent of the bifurcation legislation (Act 126) by proposing many changes to the existing Chapter 78 provisions for conventional operations. This is substantiated by the correspondence from legislatures and through conversations with sponsors of the bill.
- The current regulations are overly prescriptive and burdensome to the industry without justification for needed protection of the environment. It was recently documented by the Department that violations have dropped from an average of 18% per inspection conducted to 8% per inspection conducted. This demonstrates that the existing regulations are working and further changes are not needed.
- The proposed regulations fail to present a flexibility analysis for small businesses as required by law.
- The Department has failed to quantify the cost of compliance with the proposed new regulations.
- There are a dozen or more forms referenced in the proposed regulations that have not yet been drafted or disseminated by the Department and were not included in the Advanced Notice of Final Rulemaking. The industry and other interested parties should not be required to accept these forms as satisfactory in the final regulations without a chance to review and comment.

- There needs to be a distinction in the “Notice of Violation” process between administrative type violations and environmentally threatening or damaging violation. There also needs to be a mechanism to have a NOV removed from the record if it is shown the violation was issued inappropriately. Violation statistics are often used to characterize the oil and gas industry as very bad actors and revisions of the violation procedures in this regulation package is appropriate.
- The provision to complete environmental enhancement projects in-lieu-of paying fines for environmental violations should be included in this regulation package.

For these reasons the draft regulations for the conventional industry should be withdrawn. However, if the regulations are not withdrawn the following specific concerns are offered.

Section 78.51 – Protection of water supplies

If an operator causes a change to the water quality of a private water supply the water must be replaced with like quality water or to the standards established under the PA Safe Drinking Water Act, whichever is better. My objection is that the replaced water must meet municipal drinking water standards even if the water did not meet those standards prior to drilling. Further, no domestic water supplies are subjected to this standard throughout the State. There is lots of room for misuse of this provision, particularly in Pennsylvania where there are no domestic water well construction standards.

Section 78.15 Application requirements

In addition to requiring setbacks from public resources (parks, state forests, game lands, wildlife areas scenic rivers, national landmarks, critical communities, historic or archeological sites, school properties, well head protection zones, the operator is required to describe the functions and use of the public resource. The operator should not be made to speculate on the functions and use. This is a transfer of the permitting review process from the Department to the operator or to other agencies in the State. DEP should not shift its responsibility to others.

Wellhead Protection Area

Further, clarification is needed on what constitutes a “Wellhead Protection Area”. This section should specify that the wellhead protection areas is not

as it is defined in the "Wellhead Protection Plan" and only pertains to that area that is zoned for protection by the municipality involved.

Other critical communities

This expands the requirement from identifying and protecting threatened and endangered species to identifying and protecting "other critical communities". Other critical communities have not gone through the public listing or review process and includes many items that one governmental agency or another has decided internally are worthy of protection. Again, there is lots of room for misuse of this unrealistic expansion of the intent of protecting threatened and endangered species and the Department should only require an evaluation of listed threatened or endangered species.

Section 78.66 Reporting and remediating spills and releases

This section requires that the operator that experiences a spill or release enter the Act 2 Land Recycling Program for remediation. The objection here is that the Department is taking a voluntary program created to encourage the reuse of blighted lands and making it mandatory for oil and gas operators. In addition, this section imposes time lines for specific actions that do not exist in the Act 2 program. This is a gross misuse of the program.

Further, this section establishes unrealistic reportable quantities for a brine release. Any release of 5 gallons or more must be reported to the Department. This volume is more stringent than most listed hazardous wastes. Further, a threshold value of 42 gallons is proposed to require enter the Act 2 program. This is considered overly burdensome and will lead to excessive costs and time without a corresponding environmental benefit.

Further, the requirement to report the nature of any injuries (Section 78.66(b)(2)(vii)) and property damage (Section 78.66(b)(3)(ii)) is outside the scope of protecting the environment and should be stricken from this regulation package.

Advanced notices

The proposed regulations also have numerous requirements for advanced notifications to the Department for certain field activities. Each and every one of those requirements opens the operator to violations and fines that are not of a nature to cause any environmental harm, but are simply administrative in nature.

Dave Miller
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Testimony at DEP Hearing
Warren, PA
4/30/2015

We're here to discuss regulations for PA's natural gas industry. My remarks focus on unconventional gas production, but regulations that protect the public shouldn't be any different for other types of gas production.

We have about 8,000 (Note 1) unconventional gas wells in Pennsylvania and some say we're on our way to 100,000 (Note 2).

In order to frack one well, you need to start with millions of gallons of fresh water, but let's be conservative and call it one million. So those 8,000 wells required mixing at least 8 billion gallons of fresh water with toxins that are off the charts in their ability to cause cancer, brain damage, and birth defects. And is it any wonder that Pennsylvanians are getting sick in droves?

The freshwater contamination I just described wasn't a risk or an accident, it's the recipe for fracking fluid. The toxins are mixed in, and they can't be engineered out.

And if that isn't bad enough, when toxic fluids flow out of the wells, they're pumped into open pits, sometimes without liners. Even when the pits don't leak – and they do – some of the chemicals that vaporize are heavier than air, so they settle on the ground and in valleys.

If there is any regulatory message here, it's that open waste and wastewater pits associated with natural gas drilling of any type should be banned.

Humans have no substitute for water, and the deliberate and irreversible contamination of fresh water on such a vast scale should be reason enough to declare a moratorium on unconventional natural gas drilling, as our neighbors in New York have had the foresight to do.

It is almost pointless to talk about regulations for an industry that hasn't drilled a tenth of the wells it wants to, and is already running circles around the DEP, the legislature and communities across the state.

The Pennsylvania Constitution says that we have a right to clean air and water, and that the Commonwealth, which includes our courts, governor, legislature and the DEP, is a trustee of Pennsylvania's natural resources, not only for us but for future generations.

It's time for the Attorney General and the DEP to start suing the industry on behalf of Pennsylvania communities and stop suing our communities on behalf of the industry.

Notes

- (1) <http://stateimpact.npr.org/pennsylvania/drilling/> (Retrieved 4/29/15)
- (2) <http://www.theguardian.com/environment/2011/apr/21/pennsylvania-ground-zero-shale-gas> (Retrieved 4/29/15)

TESTIMONY OF JOSEPH T. LEIGHTON, ESQ.

ASSOCIATE DIRECTOR

ASSOCIATED PETROLEUM INDUSTRIES OF PENNSYLVANIA

DEP PUBLIC HEARING ON ADVANCED NOTICE OF FINAL RULEMAKING

CHAPTER 78 AND 78a

APRIL 30, 2015

WARREN COUNTY COURTHOUSE

WARREN, PA



**Associated Petroleum
Industries of Pennsylvania**

A Division of API

Good evening. My name is Joseph Leighton and I am the Associate Director of the Associated Petroleum Industries of Pennsylvania.

API-PA is a division of the American Petroleum Institute (API), a national trade association that represents all segments of America's technology-driven oil and natural gas industry. Its more than 625 members – including large integrated companies, exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms – provide most of the nation's energy and are backed by a growing grassroots movement of over 25 million Americans. The industry also supports 9.8 million U.S. jobs and 8 percent of the U.S. economy, and, since 2000, has invested over \$3 trillion in U.S. capital projects to advance all forms of energy, including alternatives. Our members, who own and operate conventional and unconventional wells in Pennsylvania, have a direct interest in this Advanced Notice of Final Rulemaking (ANFR).

API is also a standard setting organization. For 90 years, API has led the development of petroleum and petrochemical equipment and operating standards. These standards represent the industry's collective wisdom on everything from drill bits to environmental protection and embrace proven, sound, engineering and operating practices and safe, interchangeable equipment and materials for delivery of this important resource to our nation. API maintains more than 650 standards and recommended practices. Many of these are incorporated into state and federal regulations; and increasingly, they are being adopted by the International Organization for Standardization. API encourages and participates in the development of state regulations that provide environmental safeguards and stewardship, and commends DEP on their regulatory oversight program; however we have concerns with several provisions contained in the draft final rulemaking. As such, we are providing comments on the Advance Notice of Final Rulemaking for 25 PA. Code Chapters 78 and 78a at the three public hearings. Since both Chapter 78 and 78a are very similar, my comments apply to both chapters. Tonight I will address several specific issues.

§ 1. Definitions.– other critical communities – This definition includes many not clearly specified plant and animal species that are not listed as threatened or endangered by a public resource agency as well as numerous other undefined geographical areas, geological features, natural features and natural communities. The complete lack of regulatory definition or criteria application to these many terms embedded in this definition would allow the designation of any species by the Pennsylvania Fish and Boat Commission, Pennsylvania Game Commission, water purveyors, municipalities, and school districts, without going through the regulatory review process. This delegation of power should not be done by regulation, but should require legislative action under the various enabling statutes for those entities. Consequently, it is recommended that this definition be deleted, unless and until legislative action provides the necessary clarity.

§ 1. Definitions. – public resource agency – This definition includes water purveyors, which can include public utilities, community water associations, individuals and other entities that are not considered to be public. This, coupled with the use of the term in § 15 (d) and (f), will be discussed under the comments on §5.

§ 1. Definitions. – threatened or endangered species – The definition includes species identified as threatened or endangered under the Fish and Boat Code and the Game and Wildlife Code. Under current practice the Pennsylvania Fish and Boat Commission and the Pennsylvania Game Commission, which develop regulations outside the regulatory review process requirements, could identify species to be included on the list without subjecting the designation to public review and comment.

In addition, the definition includes animal and plant species proposed for listing as endangered and threatened, pursuant to the Endangered Species Act. Since these species have not been listed but are only proposed, the legal protections of the Endangered Species Act should not be extended to them, nor should they be defined as “threatened or endangered species” by PA DEP regulation... Consequently, it is recommended that reference to the Wild Resources Conservation Act, the Fish and Boat Code and the Game and Wildlife Code be deleted from this definition and that only animal and plant species actually listed under the Endangered Species Act be included in the definition.

§ 5(f) and (g). Application requirements/limit of disturbance – This subsection requires the operator proposing to construct a well in a location that may impact a public resource to notify the public resource agency and DEP. The term “public resource” is undefined, but the operator is referred to a number of instances, including a limit of disturbance that will impact other critical communities, a location within 200 feet of common areas on a school’s property or a playground, and within an area designated as a wellhead protection area as part of an approved wellhead protection plan. The operator is to notify the public resource agency of the limit of disturbance, provide identification of the public resource, come up with a description of the functions and uses of the public resource, and a description of measures to be taken to avoid or mitigate impacts.

In subsection (f)(1) a series of public resources and proposed distances on limits of disturbance of the well site are listed. This list is not consistent with §3215(c) of Act 13. Habitats of rare and endangered flora and fauna are not included. And, (f)(1)(vii) and (viii) relating to common areas on a school’s property or a playground, and area designated as a wellhead protection area as part of an approved wellhead protection plan are not included under §3215(c). This creep of authority is problematic in that a playground is not defined and a wellhead protection plan consists of zones where certain protections are to be provided, which is not acknowledged. It is recommended that the list of public resources in § 15(f) be limited to, and consistent with, those provided in §3215(c) of Act 13.

§ 15(f)(1) proposes distances for limits of disturbance of the well site from specified public resources. This is inconsistent with §3215(c) of Act 13 that lists distances for wells, and not well sites. It is recommended that this section be changed to be consistent with the statute.

As noted above in the comment on the definition of “public resource agency”, the definition includes parties that are not public entities. Notification requirements and standing to file comments are being provided to them without justification. It is recommended that these provisions should only be provided to truly public agencies with defined legal jurisdictions.

Given the significant uncertainties in how public resources are described and how other critical communities are defined, impacts to locations considered to be other critical communities may be unknown to the operator. It seems unreasonable to have the operator identify the public resource, describe its uses and functions to the public resource agency, and develop avoidance or mitigation measures when the public resource agency is the entity that knows about the public resource. This requirement can put the operator in a difficult position. If, for example, the resource agency declares a species to be part of another other critical community, that species could be placed in PNDI without the opportunity for peer review or public input. That could trigger a series of unnecessary events that could be costly to the operator in terms of time and money, when in fact the protection may not be necessary or appropriate. And if the DEP conditions the permit based on the operator’s description and the public resource agency’s comments, the DEP may have to defend an appeal of the permit condition when a third party who might not be a public entity has information necessary to defend the appeal.

It is recommended that the “other critical communities” be limited to locations that have been identified and listed by truly public entities through a process that includes public comment, and that a “public resource agency” be required to follow procedures under the regulatory review process when listing a species for protection. This would minimize the frequency of permit conditions leading to appeals, and would help to assure that “other critical communities” that truly deserve protection are properly identified and protected in a legal manner.

§ 15(f) discusses impacts to public resources and a process for avoiding or minimizing those impacts. § 15(g) indicates that DEP will consider probable harmful impacts of the well, well site or access roads to public resources and consider conditions to the well permit to avoid or mitigate those impacts. Conditioning the well permit to address potential impacts of other activities at the well site and access road is not appropriate. There are other regulatory avenues under other statutes and regulations to avoid or mitigate those impacts. It is recommended that this section be revised accordingly.

§3215(e) of Act 13 requires the development by regulation criteria for the department to use for conditioning a well permit based on its impact to the public resources identified in subsection (c) and for ensuring optimal development of oil and gas resources and respecting property rights of oil and gas owners. The process proposed in § 15(f)(2) does not provide criteria as required by statute. The statements in § 15(g) indicating that DEP will consider

impacts to the public resource functions and use, without providing any criteria for use by DEP or the operator, is not consistent with the legislative intent. Without criteria, it is questionable whether or not DEP is authorized to condition a well permit for activities related to public resource protection. It is strongly recommended that DEP develop such criteria and promulgate those criteria in regulation as required by Act 13.

Thank you for the opportunity to testify this evening. API-PA and its member companies stand ready to continue to work with DEP on striking a balance between environmental protection and economic development.

Public Hearing to Discuss Revisions to Chapter 78 and 78a.

Hello, my name is Dean Johnson a resident of Warren County, Pennsylvania and I reside at 731 Frantz Road, Warren, PA, 16365. My family owns a 400 acre farm and farms an additional 300 acres in the area of Glade Township. We grow some small grains and produce mostly hay for feed and mulch. Also our 400 acre farm is open to all public hunting. We sell a large percentage of our produce (approximately 35%) to several local oil producers in the form of small bales of mulch hay and straw. We also sell seed oats that they mix in with their grass seed that helps their seedings get established quicker and acts as a nurse crop. Every producer that we deal with does an outstanding job with restoring the land.

We have conventional shallow wells on our property that has supplied us with natural gas and oil for the last 40 years. Most of the land we rent also has conventional shallow wells. Along with being active in the community I have served on the Warren County Conservation District Board of Directors for the past 32 years. During this time I have seen many changes. Most notably the establishment of the Department of Environmental Protection (DEP) from the old Department of Environment Resources, the DER. There is a much better working relationship with the conventional (shallow well) producers today than there was with the old, confrontational, DER. As a District we used to receive many oil and gas complaints. Those have all but disappeared today.

Back in the 1970's and 1980's there was a huge difference in the way oil producers worked. But through cooperation and education, the wells and well sites of today are designed to prevent damage to the environment and especially water quality, all have a Chapter 102 plan. Streams of the past that used to run brown with mud when there was oil activity in the area are

now crystal clear and streams of high quality fishing.

I would like to thank the Department of Environmental Protection for this opportunity to testify on the amendments to Chapter 78 and 78a. The separation of Conventional wells (shallow) Chapter 78 and unconventional (deep) wells 78a was greatly appreciated but I think you have missed the point. The conventional shallow well producers have been doing an outstanding job with the current DEP regulations. We are people who live in the community and want to be good neighbors and do what is right for the environment. It is our land and we want to be good stewards.

All of your amendments of:

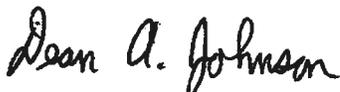
- 1.) Improve protection of water recourses
- 2.) Public resources considerations
- 3.) Protect public safety
- 4.) Address landowner concerns
- 5.) Enhance transparency *and*
- 6.) Improve data management are addressed in your current regulations.

It appears that this is another way to slowly shut down an industry, through regulations, that provides many jobs to the area.

I would hope that a more ^{Thorough} ~~thorough~~ and "transparent" explanation of you changes would be forthcoming. The 120 pages of Amendments to Chapter 78 that I read, were very confusing. I hope this isn't a way for "Environmental Activist" to have more of a say in the oil industry than the men and women who work in the industry every day and are true "Active Environmentalist".

Thank you.

Sincerely,



Dean A. Johnson

TESTIMONY
Warren, PA April 30, 2015

My name is Arthur Stewart. I am secretary of the Pennsylvania Grade Crude Oil Coalition (PGCC) and my remarks are made on its behalf.

PGCC has three general comments about the regulations revealed in 2015:

- First, PGCC is shocked at the number of new burdens added, as well as the complexity of same;
- Second, PGCC asserts the procedure used to arrive at the proposed regulations is fatally flawed.
- Third, the number and magnitude of the burdens is so large that PGCC has not completed its study; PGCC concludes the time for comment is not adequate;

Concerning that comment, PGCC notes the new provisions are complicated and make reference to numerous regulatory provisions outside of Chapter 78. Not only is this inconsistent with the expectation of simplicity contained in the Regulatory Review Act, it means that we have not had time to fully analyze the consequences of the new burdens. In 2013 PGCC spent several months compiling a 60 page cost analysis. It is impossible to do similar work in the compressed timeframe allowed this spring.

Concerning procedure, PGCC observes that Act 126 of 2014 requires EQB to promulgate "proposed regulations . . . relating to conventional oil and gas wells separately from proposed regulations relating to unconventional gas wells." This process was not followed. Instead, the separate conventional rule was crafted by merely separating the Chapter 78 revision that was already published for public comment in 2013.

This failure of process deprives citizens of the statutory steps required under law. The Commonwealth Documents Law requires an agency to give public notice of its intention to promulgate or amend regulations; the law contains several safeguards not honored with the amendments before us.

The Regulatory Review Act requires a "statement of the need for the regulations." When the proposed 2013 regulations were issued, DEP's statement of need focused on the burgeoning unconventional oil and gas industry. When the 2015 changes were unveiled a month ago there was no statement of need. Without a statement of need for revised conventional regulations it is impossible to meaningfully comment on whether the proposed conventional regulations meet a real need or even a legislative purpose.

The Regulatory Review Act also requires the DEP to provide an estimate of costs for proposed regulations. PGCC has already commented on the inadequacy of the DEP's financial analysis that accompanied the 2013 proposed regulations. When the 2015 changes were published the DEP provided no financial analysis. Nevertheless, those 2015 changes involve many new burdens. When we take into account that in 2013 the DEP failed to provide a financial analysis of over 80% of the proposed provisions, and that in 2015 the DEP made NO financial analysis of the newly introduced provisions, we see that the DEP performed a financial analysis of virtually NONE of the new provisions now being proposed for the conventional industry. The failure to analyze these provisions is not in accord with law and makes it impossible to engage in a meaningful comment process. Stated another way--it is impossible to comment upon a financial analysis that does not exist.

The Regulatory Review Act also requires the DEP to conduct a "regulatory flexibility analysis" that examines alternatives suitable for small businesses. The Act requires specific consideration of small business alternatives in the following areas:

- 1) compliance standards;
- 2) reporting; and
- 3) schedules

The Act also specifically directs the DEP to consider "exemption of small businesses from all or any part of the requirements."

This regulatory flexibility analysis has never been performed for the separate conventional regulations and the many new burdens introduced in the 2015 version. PGCC offered to meet with DEP to discuss the very types of alternatives contemplated for small businesses. While a meeting was promised, none occurred.

I want to spend my remaining time commenting on at least one of the burdens newly introduced in 2015. Historically, when disturbing five acres or less, oil and gas activities have been exempt from the complicated stormwater analysis in chapter 102.8(g). Under the 2015 regulations, however, all conventional drilling sites would be subject to the analysis. The analysis must be performed by certified professionals and PGCC is in the process of obtaining quotations from engineering firms for compliance. Ballpark estimates put the new cost at several thousand dollars per well. This is an untenable cost—made more so by the lack of any statement of need for this new burden.

Remarkably, the 2015 changes are much broader than the stormwater provision. PGCC counts over 30 new obligations contained in the new conventional regulations. PGCC will discuss those in more detail in written comments which it is submitting. However, all of the proposed changes are tainted by the serious procedural failures. The only way to correct the failures is to begin a fresh process for conventional oil and gas regulations that launches with a statement of need for why changes should be made to the existing conventional oil and gas regulations.

April 30, 2015

Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

RE: Comments to Proposed Regulations 25 PA Code Chapter 78 Subchapter C-
Presented at the Public Hearing held on April 30, 2015, in Warren, PA

To EQB Members,

I am Dave Hill. As a fourth generation oil and gas drilling contractor, I am here tonight to testify regarding the revisions to 25 PA Code Chapter 78 and 78a Subchapter C. I am currently retired from contracting, but I serve as a consultant for various companies throughout Northwestern Pennsylvania. I own in fee 102 acres of land on which I operate 18 oil and gas wells. I also live on this land and drink water from our water well. I belong to PIOGA, the Pennsylvania Grade Crude Oil Coalition, and NYSOPA. I am a graduate of The Pennsylvania State University and my son is also a Penn State petroleum engineering graduate, which makes us a five generation oil and gas family.

I believe that I have come full circle in the oil and gas industry. As a teenager, with my father as mentor, I learned to operate and drill using a cable tool rig. After my college graduation, I was asked to teach the Oil and Gas Production Career and Technical Course at Bradford Area High School. After three years, I returned to my family business and operated Hill Drilling for 31 years with 3 rotary drilling rigs in Southern Pennsylvania, Ohio, New York, and the West Virginia border. Now, I have returned to operating cable tool rigs and, in recent years, I have drilled my own 10 wells. I am presently drilling the eleventh well. My neighbors have expressed their appreciation for my efforts in not only restoring 8 non-producing wells drilled in the 1960s, but for constantly striving to improve the land on which I drill. My role as consultant has reacquainted me with many owners and operators in Northwestern Pennsylvania. It has also given me the opportunity to review and study current and proposed oil and gas regulations.

The conventional industry has been part of the Western Pennsylvania landscape and an integral part of its economic engine for over 150 years. Now, in an effort to regulate a new and quite different unconventional industry that arrived here in Pennsylvania only a few short years ago, these same local conventional operators are being forced to comply with regulations that were crafted to deal with the unique and challenging issues associated with the drilling and development of the unconventional wells. These proposed regulations that were developed for unconventional oil and gas operations are inappropriate for conventional operations and impose a disproportionate regulatory and economic burden on small businesses, such as my own and other conventional operators. Because many shallow oil and gas wells produce only small quantities of oil and gas, the cost of the

proposed regulation, in many cases, will make these wells economically unfeasible to drill and operate. In addition, the proposed regulations are wide-ranging and extremely vague and will require costly attorney fees for their interpretation. The DEP must consider the cumulative impacts of this ever-increasing set of rules, permits and policies on conventional operations. With low natural gas and oil prices, the conventional operations will be further negatively impacted causing unemployment for many businesses associated with the oil and gas industry. Remember, as I learned in my college biology class, "A smart parasite never kills its host."

Following several public meetings and recommendations presented in 2014, the Bifurcation Bill was passed through the House and the Senate and became law. Why are our new governor and the newly organized Department of Environmental Protection failing to recognize the separation of conventional and unconventional regulation? Please honor the law to comply with the regulations that are appropriate for the conventional oil and gas operations.

Sincerely,

David L. Hill
Hill Drilling
Bradford, PA

Mark B. Miller, P.G.
12292 Walton Hill Road
Meadville, PA 16335

Comments on the Chapter 78
As Allowed under the Advanced Notice of Final Rule Making
Warren County Courthouse
April 30, 215

My name is Mark Miller and I am a licensed Professional Geologist in the Commonwealth of Pennsylvania. I have 25 years of environmental consulting experience and have worked extensively within the Departments Act 2 program. I specifically would like to comment on *Reporting and remediating spills and releases (78.66 and 78a.66)*. The comments that I make apply both to the conventional and unconventional operators.

Section 78.66(c)(2) Remediating releases greater than 42 gallons

- The operator must enter into the Act 2 Program (Chapter 250 regulations) and demonstrate attainment of one or more of the standards. The Department goes above and beyond the Chapter 250 or Act 2 regulations. These additional requirements causes a needless burden and adds needless costs to the operator.

78.66(c)(2)(iii) within 180 calendar days complete Site Characterization

- Chapter 250 or Act 2 has no provision that site characterization be completed within 180 days, why is this imposed on the O&G industry, alone? No other industry that enters into the Act 2 Program is subject to this requirement.

78.66(c)(2)(v)..... within 45 days submit a Remedial Action Plan per Chapter 245.311(a). The Chapter 245 regulations are the regulations that apply to regulated aboveground or underground storage tanks.

- Chapter 250 or Act 2 has no provisions that a Remedial Action Plan be submitted within 45 days of submittal of a Site Characterization Report.

- In fact, within the Act 2 program, one can submit the Notice of Intent to Remediate, entering a site into the Act 2 Program and the next report that could be submitted to the Department is the final report. Again, why is the O&G industry being held to a different Act 2 process than everyone else that enters into the program?
- *Chapter 245.311(a)(7)(i) Scheduling.* This requires a schedule that includes initiation and completion dates. Chapter 250 or Act 2 requires no time frame commitments, you can work at your own pace and when the project is completed you submit your final report. Again, why is the O&G industry being held to a different Act 2 process than everyone else?

78.66(c)(2)(vi) Remedial Action Progress Reports

- There is no Chapter 250 or Act 2 provision for the submittal of quarterly Remedial Action Progress Reports. Again, why is the O&G industry being held to a different Act 2 process than everyone else?

It appears that the Department is requiring O&G operators to enter into the Act 2 Program. It appears that the Department is not satisfied with the Chapter 250 requirement alone and is trying to incorporate more stringent requirements upon O&G operators. Again, why is the O&G industry being held to a different Act 2 process than everyone else?

Attached is the Departments *Land Recycling Program's Transmittal Sheet for Plan/Report Submission.* (Act 2 reports). There is no box to check for Site Characterization Reports, for Remedial Action Plans or for Remedial Action Progress Reports.

This clearly illustrates that the Department is singling out the oil and gas industry and requiring that they go above and beyond the normal requirements of the Act 2 program.

By doing so the Department adds additional requirements that no other industry that enters the Act 2 Program must follow and this causes a needless burden and adds unnecessary costs to the operator.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL CLEANUP AND BROWNFIELDS
LAND RECYCLING PROGRAM

**Land Recycling Program
Transmittal Sheet for Plan/Report Submission**

Instructions: Please provide all requested information in each of the four sections. This transmittal sheet shall accompany any plan/report submitted to the Department under the Land Recycling Program. Proper completion of the Transmittal Sheet will assist Department review and may avoid a finding of plan/report deficiency. The Facility ID number can be obtained from the Department's Environmental Cleanup Program in the region where the site is located.

Section 1 - Site Identification

eFACTS Facility ID _____

Site Name _____

Site Address _____

Municipality and County _____

Section 2 - Remediation Standard . . Plan/Report . . Fees

Identify the remediation standard being pursued and the type of plan/report being submitted. Please note required Department fees follow each type of plan/report.

Check the relevant standard and the type of plan/report being submitted.

Background Standard
Final Report (\$250 fee)

Statewide Health Standard
Final Report (\$250 fee)

Site-Specific Standard

Special Industrial Area

Remedial Investigation Report
(\$250 fee)

Work Plan
(no fee)

Risk Assessment Report
(\$250 fee)

Baseline Environmental Report
(no fee)

Cleanup Plan (\$250 fee)

Final Report (\$500 fee)

Ensure your check covers all required fees and is made payable to the **Commonwealth of Pennsylvania**.

Section 3 - Municipal/Public Notice Confirmation

There are two stages in the Land Recycling Program where municipal and public notices are required. Read the information associated with each stage. You will be asked to confirm that information establishing your compliance with these notification requirements has been included with this submission.

- Check here if you are planning to meet the Background or Statewide Health Standard and your Final Report has been submitted within 90 days of the release.

Indicate date of release here _____

No further completion of this section is required if your Final Report for these two standards conforms to the 90 day time frame.

Stage 1 - Notice of Intent to Remediate (NIR)

- Check here to confirm you have included proof that a copy of your NIR was provided to each municipality where your site is located. Proof will be a copy of your cover letter and a copy of a signed certified mail receipt slip from the municipality.
- Check here to confirm a copy of a proof of publication document from a newspaper serving the area of your site has been included with this submission.
- Check here to indicate that a Site-Specific Standard or a Special Industrial Area is involved and a municipal request was received for development of a public involvement plan. The plan/report submission shall include municipality and public comments, which were submitted, and your responses to those comments.

Stage 2 - Cleanup Plan/Report Submission

_____ Place date here that each municipality was notified of any plan or report submitted under any of the three remediation standards.

_____ Place the newspaper name and date that your notice of your plan/report submission was published.

Section 4 - Project Contact

On the lines below, place the name, company, and business phone number of the individuals who can be contacted regarding this submission:

_____	_____
_____	_____
_____	_____

Shantel D. English

Hydraulic Fracturing and the Environmental Impacts

Is hydraulic fracturing as harmful to the environment as society has been lead to believe?

There are many frightening stories concerning hydraulic fracturing and its impacts on the environment. How much truth lies behind the controversy?

In 2010 a documentary was made by environmentalist Josh Fox, titled, *Gasland*. The purpose of the film was to explore the option of leasing your land to gas drilling companies, giving the rights to extract natural gas and or oil by means of hydraulic fracturing. The film revealed many horrifying stories concerning the impacts hydraulic fracturing allegedly has such as; air pollution (causing many illnesses including cancer), seismic activity, contamination of drinking water, wasting too much water, destroying the natural ecosystem (killing all wildlife) and much more.

Gasland insinuates hydraulic fracturing is the leading cause of most problems our economy faces today. The film was an Oscar-Award winning film misleading many people with false accusations and untrue facts, resulting in a banning on drilling in many different locations. Those uneducated about the advantages of hydraulic fracking were very pleased with this "Anti-fracking" movement. The citizens that the movement had the most impact on seem very scared of loosing their farming land and means of living.

As according to epa.gov; Hydraulic Fracturing is a very efficient way of extracting trapped resources far below the earth's rock formations. A hole is drilled over a mile deep underground, far below the water table, using fresh water based fluids that are released to cool the drill bit, carry rock cuttings back to the surface and stabilize the durability of the wall. A

steel pipe (called a casing) is then placed into the hole, lining the entire depth of the well, which is then cemented into the well, thus creating a barrier avoiding any leakage into the earth's layers. Once the well is checked to be isolated from the ground water and other undesired zones, explosives (shaped charges) are detonated near the bottom of the casing, far enough down, so there is no sign of seismic activity. The shaped charges burn holes through the casing, cement and formation. Then, a mixture of 99.5% sand/water and 0.5% additives is pumped down the casing at high pressure and out into the formation through the holes to finish fracturing the reservoir rock holding the resources desired. The sand keeps the rock separated allowing oil/gas to freely flow up the well, allowing the extraction process to begin. The excess fluid is easily recovered and either safely disposed of or recycled for the next well. This process takes more than 3 months to complete, leaving the hole safely accessible for use for up to twenty to forty years after.

Once the well is no longer of use the well is plugged and trimmed well below the ground water level. Everything is then filled back in, i.e.: trees, grass, and plants are all replanted. This process is called reclamation, leaving no signs of drilling activity making a safe land for farmers and animals to once again use.

Many people believe resorting to other energy sources such as; solar power and wind tunnels is a much more efficient way. However they don't think about the down falls they may bring as well. For instance to make solar power energy requires loads of rare earth metals creating both a very expensive bill and a lot of pollution being forced into the air. And wind tunnels take up unnecessary room, showing no endangered bird mercy. Not to mention the supply and demand they both have. Destroying 100 square miles everyday just to keep up.

Fox retrieved the majority of his “facts” for *Gasland* from himself, residents, protestors, and several “specialists” unable to provide valid credentials when asked by Investigative Journalist Phelium McAleer in his follow up documentary *Fracknation*. Many of the points have been disproven by highly reliable and reputable sources some including Fox’s speculations of the following;

“Hydraulic fracturing blasts a mix of water and chemicals 8,000 feet into the ground. The fracking itself is like a mini-earthquake. ... In order to frack, you need some fracking fluid – a mix of over 596 chemicals”. The University of California/ Berkeley’s biochemist Bruce Ames, PhD suggests “the long list of scary chemicals which was found in the drinking water is not that big of a deal. The same list of [scary] chemicals can also be found in broccoli.”

Fox argued in a letter sent to New York Gov. Andrew Cuomo that breast cancer rates spiked in an area of the Barnett Shale where extensive drilling is taking place. University of Texas medical anthropologist Simon Lee, PhD and Texas Cancer Registry epidemiologist David Risser, PhD, MPH, along with researchers from Susan G. Komen for the Cure, were all unable to find any evidence to substantiate the claims of the Barnett Shale “cancer spike”.

Fox also mentions that hydraulic fracturing is the leading cause of seismic activity. University of California/ Berkeley energy geophysicist Ernest Majer, who tells McAleer that fracking has the lowest risk of causing an earthquake of any type of energy production.

Many people across the world were misled by *Gasland*’s allegations resulting in a halt in production, killing farmer’s pensions they depend on. As stated in the film *Fracknation* from a farmer, leasing his farm land to natural gas drilling, “The gas well is the best cow on the farm. It makes the most money, doesn’t bother the water or cows. My land is healthy and the water tastes no different than it ever did. When fracking is down so is my farm.”

The E.P.A. has tested all harmful allegations made against hydraulic fracking, all have come back negative. There is no sign of harmful chemicals in drinking water that was not previously there before, people are not "catching" cancer near working drilling sites, and land is fully restored to natural allowing animals to live a healthy life.

Is Hydraulic fracking what America should be most concerned about restricting, or should we be more concerned with properly educating the public concerning the low risks and high yields? In conclusion it's clear we benefit a great deal from hydraulic fracturing and as humans we easily fall victim to propaganda.

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Generations
FORESTRY



Kenneth C. Kane, President
Est. 2013

Comments of:
Kenneth C. Kane, ACF

April 30, 2015

Committee Members,

Thank you for the opportunity to address you this evening. My name is Kenneth C. Kane. I am the President of Generations Forestry, Inc. Generations Forestry, Inc. is a forest consulting company located in Kane, McKean County, Pennsylvania. Generations Forestry, Inc. is involved in the forest management of approximately 250,000 acres of forestland, mostly located in Northern Pennsylvania.

I was born and raised in Kane, Pennsylvania and chose to move back to Kane shortly after graduating from Penn State. I have been involved in rural community activities, including service as a school director throughout three decades. The area I live and work in has been providing natural resources since the time of settlement, over 150 years ago.

In practicing forestry in this resource-rich region for over 30 years I have worked with many conventional oil and gas producers. Though I have not gotten along with all of them all of the time, I can honestly state that I never felt that one of them got out of bed in the morning with the intention of harming the environment. They all want to produce a resource desired by society.

I have worked diligently with oil and gas producers throughout my career in reducing the impact of resource extraction on the environment through smaller, better placed well locations and access roads. I am concerned that if the proposed rules are implemented the landscape will experience more disturbance. I believe the rule implementation will require a larger footprint on the landscape, causing a larger and longer overall impact that has been historically experienced.

I urge you to reconsider implementing the proposed rules. The language and potential interpretation of the proposed rules are threatening and intimidating to an industry composed of small, mostly family-owned and operated businesses. These small, traditional oil producers are producing the same oil fields that fueled this Country's energy needs through two World Wars. All the while improving the quality of the water resource of the region. I see no reason to implement new, more complex regulations on this vital industry. In simple terms, if is not broken, do not try to fix it! The 2015 regulation add Municipalities and School Districts to the list of public resource agencies charged with managing public resources. Believe me, as a former school director, the responsibilities of public education are complicated and challenging enough that you need not add the public resources to school directors, who serve as non-paid public officials. Unfortunately time does not allow for more detail. However, I will make myself available at the committee's request for a more detailed discussion.

Thank you.

Dear Board,

I haven't been in the oil and gas industry nearly as long as many in here today and have nowhere the experience as the men I've worked for in this room. That being said, during my time working as a rig hand with Pennsylvania crude and as a land man working with Marcellus shale pipelines, I've had plenty of time to develop my own opinions of the DEP.

Your zero tolerance policies when it comes to infractions on the part of producers is about the most hypocritical thing that I have ever heard, even as far as government policies go. I recently got to sit in on a story about an orphan well in a residential area that blew back oil and impacted a local community. A friend of mine's wife heard the noise, so he went to inspect the damage. Being an oil man his entire life, he knew the severity of the situation, put down hay bales and bags of peat moss of his own to prevent the oil from spilling into a nearby waterway. This orphan well was also within about 25 ft of a nearby woman's water well.

When he got a chance the next day, and the DEP was on the scene, he told them what he'd done and asked what they were going to do, if they were going to plug it; too which the agent replied, we don't have the money to do anything, we already went through our budget. Where's the zero tolerance on your part? Whatever happened to leading by example or holding yourself to a higher standard. I guess those things we were taught go out the window when it comes to big brother.

But...this same man that did the right thing to help clean up the DEP's mess, because you are legally obligated to those orphan wells, gets pegged with fines of his own because his "Stuffing box had a slow leak". You fine producers thousands of dollars at the very sight of the most minute amount of oil where it shouldn't be. But one of your wells blows hundreds if not thousands of gallons into the environment and I guess you're theory is, Do as I Say, Not as I do? The hypocrisy is mind-blowing. It doesn't sound to me...like you're quite as worried about the serious environmental impacts at hand as you are making a profit off of producers. Sounds to me like what we're really dealing with is the Department for Environmental Profit.

Marcellus Shale companies can fend for themselves against big government..Independent producers cannot. When they're livelihoods are at stake because of an overbearing, over regulating, tyrannical government they must band together like any other group in history has done. My heart isn't in Washington County with Marcellus shale, it's in Northwestern Pennsylvania and that's why I'm here. We've fought this since these new regulations were announced, and we'll continue to fight. The way I see it, we've only just begun.

Thank you,



Christian Zavinski

Comments submitted at DEP Public hearing on proposed Chapter 78 regulations held in Warren, PA on April 30, 2015.

Commenter:

Jim Bolinger

VP/General Manager

ARG Resources, Inc.

285 Custom Lumber Lane

Kane, PA 16735

Throughout the process of the rulemaking by the PADEP the industry continuously asked why existing Regulations needed to be changed. This is a question that I believe the DEP failed to answer during the initial phases of the process. It has resurfaced again in this phase. The explanation provided to industry representatives by the head DEP officials after the initial comment period was that there have been changes in technology that warrant new regulations. The industry was quick to question this statement and ask for more specific information. No specific reply was given that could be backed with facts. Anyone who has been involved in this industry on the conventional side knows that there have been no significant changes in our practices, technology, chemistry, etc. for at least 10 years if not longer. The current regulations have been revised within this time frame.

During the period of this revision Industry representatives went back to the DEP again asking why the need for change. The DEP's answer this time came through the newspaper article in the Pittsburgh Post-Gazette dated April 19, 2015 in which they submitted photos that explained their justification. I quote from this article "The State Department of Environmental Protection is preparing to show them in full color. Regulators have compiled hundreds of photos taken by field inspectors in recent years to document violations at Traditional, shallow well sites". I believe this was their way of trying to sway public opinion as a review of these photos by anyone with industry knowledge quickly shows the majority, if not all, of the issues shown could be addressed with existing regulation. The DEP even proves this point by a quote from the same article which states, "These photos were taken by inspectors with the Pennsylvania Department of Environmental Protection to document violations of environmental laws and rules at the state's traditional, shallow well sites." If these pictures document violations of existing regulations, then new regulations are not justified.

Last night I attended the Washington, Pennsylvania DEP public hearing on the new proposed changes to Chapter 78. Unfortunately due to the distance from my work and the late hour I had to leave after about 60% of the scheduled speakers had given their comments. During the hearing I found myself concentrating on the non-industry commenters. I worked them in four categories: 1) those that were in support of the industry for various reasons, 2) those that were opposed to the industry for various personal experiences, 3) those that were against the industry in general with no logical reasons, and 4) those that had comments for tighter regulations and pointed to specific areas of the regulations. I found myself drawn to the last category since I felt they had taken time to actually read and understand the proposed regulations. Of that group the majority had issues with frac pits, unknown chemical usage, air quality, noise, radiation and location setback from schools. I feel all of these areas are valid concerns but most of them are not addressed by these new regulations. My main take away from looking at almost all of these speakers' comments was that they excluded the conventional operators through comments like "these comments only apply to Chapter 78A regs" or "these comments do not apply to conventional operations".

The other fact that many of the non-industry speakers noted was NY facing ban. I want to remind the DEP officials here that this ban does not include conventional operators in NY.

I believe this change in public opinion is due to the effort of many in the industry, including many in this room, to educate the public on the differences between conventional and unconventional operations. Conventional operations

have been taking place in the state for 150 years in some of the most pristine wild areas of the state. We have also explained that the majority if not all of these conventional operators are small businesses owned and operated by citizens of the Commonwealth.

Another display of the Commonwealth citizens heightened awareness of this difference in the industry segments is Highland Township, Elk County, PA Ordinance approved on January 9, 2013 and amended on March 24, 2015 which established a Bill of Rights for the citizens of Highland Twp. This ordinance bans the "deposition of waste from the extraction of Shale Gas within Highland Twp. This ordinance was particularly interesting to me since my company operates approximately 1500 conventional wells in this Township. In the last few weeks this Ordinance has come under legal challenge by Seneca Resources who has plans for a deep injection well in the area. How did the citizens react to this challenge. They amended the Ordinance to bring better clarity to the definitions but continued the ban on wastes from Shale Gas activity (only) with full knowledge that the shallow conventional oil & gas industry existed in their back yards (literally) for over 100 years. They did not see any needs to limit conventional activities.

The industry's education process not only focused on the public but also on our legislatures in Harrisburg. With their heightened awareness of our industry and the issues it faced, they passed a bill late last year instructing the DEP to create separate regulations for the conventional and unconventional segments of the oil & gas industry. It appears to me that not only does the industry question the need for change, but also the citizens and even the legislators of the Commonwealth understand that differences in this sector require different treatment.

Lastly during the initial phase of this rulemaking process the Technical Advisor Board weighed in on the proposed Regulations as required by the rulemaking process. In their letter to the DEP they firmly warned the DEP that the proposed regulations lacked the justification of need. The DEP and this administration responded not by upgrading their analysis, but instead relieved the TAB members of their duties.

In summary I feel the DEP has failed in the rulemaking process on many fronts the first and foremost of which is the justification of the need for change. I suggest the DEP should withdraw these proposed changes and return to the regulations already in place.

CHUCK SHRADER
102 BROOK ST.
WARREN, PA 16365

DEP Public Hearing
Warren County Court House
April 30, 2015

Good evening, my name is Chuck Shrader. Currently, I work as an independent contractor in oil & gas industry. My business career background is thirty four years in the community banking business here in Warren County. The majority of that time was spent working with small businesses. I can assure you that small rural businesses face a myriad of challenges every day. Most small business folks just want to get up and go to work each day, but when faced with limited staffs, meeting payroll, the ever changing economic environment and challenging regulatory issues that cannot always be the case. I am personally familiar with countless hours of time and energy, and by extension money, spent exploring and interpreting the changes associated with the proposed new regulations.

A major challenge currently facing small businesses engaged in producing oil and natural gas is the increased burden imposed upon conventional operators generated by the site specific PPC plans proposed in section 78.55 of Chapter 78. Most conventional operators employ a generic PPC plan that meets the requirements of existing section 78.55. Among other items, the generic plan lists the company contacts and internal spill cleanup resources and also lists outside contractors who might be called upon to assist in the response. This information has been and still is a sufficient guide on how to handle materials and respond to releases or threatened releases because # 1, conventional well and tank sites are extremely small compared to the unconventional sites, #2 the volume of material that could be released from an accidental spill from a conventional site are extremely small compared to an unconventional site and #3, there are fewer and less

hazardous materials on site at a conventional vs. unconventional operations to manage.

The proposed regulation elevates the burden substantially by requiring a "site specific" plan that meets the requirements in 25pa Code 102.5(i) for each well and tank location.

Pennsylvania (for now at least!) is fortunate to have a large number of conventional oil and natural gas production sites. The positive affect on the Commonwealth's economic condition is obvious. Much of this production is managed and operated by small business owners. It is important to note that these conventional pads are highly similar, particularly relating to not having unique chemicals from site to site compared to the unconventional producers. Critical information of whom to contact and where to locate cleanup resources is generally provided to the very same contractor from site to site. Costs to the conventional operators to initiate site specific PPC plans will at a minimum be staggering with little if any measurable benefit. Certainly, today's low commodity prices emphasize this point.

Moreover, because virtually every conventional well operator is a small business, Pennsylvania law requires the DEP Analysis to consider the disproportionate burden the proposed site specific PPC change would impose upon small business and to specifically consider whether less stringent requirements are more balanced.

I would like to congratulate the conventional oil & natural gas producers of Pennsylvania. I avidly fish trout streams in Warren, Forest, McKean and Elk Counties. The streams are clean and the aquatic insects are more abundant every year. I urge the DEP to work with the industry and other stakeholders across the Commonwealth to ensure that we provide a reasonable, competitive path forward for a long term responsible conventional oil and natural gas development.

Warren
4-30-15

**David Craig Dean
17143 Hare Creek Road
Corry, PA 16407**

Thank you for this opportunity to speak to this board. This will be the second time I have voiced my grievances as a citizen of this Commonwealth. The first was in January 2014 in Meadville.

As far as the changes to be made in regulation on the draft final versions of Chapter 78 and 78a. I call for the following:

Prohibit the use of all open-air pits, tanks for storage or treatment of drilling and fracking waste products.

Protect our streams, wetlands, rivers by measuring the distance from the edge of the well pad or compressor station, increasing the distance to 500 feet. Multiple real-time monitors must be installed to detect changes in water quality.

All existing pits which contain fracking wastewater, drill cuttings, and other substances that return to the surface must be moved to closed above ground systems within one year of this regulation, not buried on-site.

All waste returned to the surface must be monitored, inspected and documented weekly. Treatment and transport to approved waste disposal sites must be documented with a paper trail.



DEP must require all contaminated water supplies be restored to either pre-drilling or safe drinking water act standards, no exceptions.

***Operators of unconventional wells* must locate, map document, and plug all orphan and abandoned wells within one mile prior to permitting and spudding.**

Honestly though, these regulations won't work. Moving an industrial complex into agricultural areas and neighborhoods which can last for one year 24/7 keeping families awake is not the answer to our energy problems.

We hear from the industry representatives and our elected politicians that the process is safe. We hear fracking has been done for 60 years, that they'll drink the fracking fluids, that those who contest this are environmentalists, liberals, and anti-jobs.



We hear, but do we see?

We see Mr. Atwood of Warren call upon Senator Hutchinson for aid once his water well was contaminated to receive no help.

We see Mr. Chris Lauff testify of toxicology results of chemicals in his and his child's blood stream.

We see Mr. David Headley and family lose their health and enjoyment of property as released emissions from tanks in their front yard cause their children suffering.

We see George Nicklosevich of Pulaski Township, Lawrence County with ethane, butane, propane , and higher levels of methane in his well water he no longer drinks.

We see Mr. Duffala call upon the DEP for help as testing shows fishing streams in Washington and Greene Counties have radium far beyond safe drinking water limits.

We see Mr. Terry Greenwood of Daisytown, Washington County lose eight calves, his bull, his water well, and his life to a gioblastoma tumor.



The avenues provided to us as citizens in this Commonwealth are not working. Governor Wolfe has an opportunity to listen, to see the struggling reality of citizens in Dimock, Hickory, Salt Forks, Avella, Pleasant Township, Pulaski Township, the Woodlands.

Our children's health and future is primary. Health care providers have called for a moratorium since 2012. They were ignored by the previous administration. Exchanging our health and neighborly love for a windfall does not serve us.

We have heard enough promises, and yet see more brokenness. We ask that you follow the example of New York and Maryland, and create a moratorium.

Our Lord said, "Do you have eyes but fail to see, and ears but fail to hear? And don't you remember?" (Mark 8:18)

Jesus called his disciples to him and said, "I have compassion for these people." (Mark 8:2)

Gentleman, where is our compassion for the citizens of Pennsylvania?





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Fracking Victim dies of Rare Brain Cancer

June 10, 2014 # 1:44 pm # [Corporatocracy Watch](#) # [No Comment](#)

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Fracked farmer died in Pennsylvania this week of a rare form of brain cancer. Harassed, threatened and soned by frackers for the last seven years of his life, Terry Greenwood was 66

Fracking company representative sat in Greenwood's kitchen in 2007 and asked him if the company could frack for natural gas on his land. The state of the law in the land being what it is – meaningless, citizens' rights second to drillers' – Greenwood didn't have the right to refuse, but he told the company man he would fight for his property, for his rights. The company man told him he didn't stand a chance if he didn't have enough money to fight the fracking giant protected by the Halliburton loophole – which exempts frackers from any meaningful regulation as well as the clean water act – and sanctioned and promoted by local, state and national government entities.

Months later, the drilling had contaminated the well from which Greenwood had drawn water for himself, his pets and his cattle for the previous 20 years. The fracker then threw him a bone – not out of the goodness of its little black heart but at the behest of county regulators" (Read: *Industry lapdogs*) – drilling five water wells, none of which produced drinkable water.

After a fracking spill the next year, ten of 18 calves born on Greenwood's property were stillborn; one was born blind, another with a split palate. The next Spring, Greenwood's lone bull, which would normally sire at least nine calves a year, became sterile.

Fracking Kills Animals First, then the People

"I killed the cattle, and it'll kill the people next," Greenwood said in an interview.

And now Terry – our canary in the mineshaft – Greenwood is dead. One can only wonder if the rest of the world will take heed.

The fracking industry can, of course, count the ways Terry Greenwood's brain cancer death can be explained away – farmers have a high incidence of cancer, anyway, brain cancer is growing as a cause of death across the country (a phenomenon entirely unrelated to fracking, of course); his rare cancer was only coincidental with the fracking; Erin Brokovich would need 20 years of studies to prove that people living next to frack sites are at a greater risk of cancer, etc. – but there are other fracking deaths that cannot be so easily explained away like the family of three who died after drinking water from their own well, which was contaminated by fracking chemicals.

Cancer Clinics are opening facilities at a record rate near fracking operations all around the Barnett Shale. Business is great for fracking and for the ever-growing cottage industry built on cancer, which, even those in the industry now admit is caused mainly by environmental toxins, some of the most hazardous of which fracking spews daily into our air and water – hydrogen sulfide, methane, ammonium fluoride (insert your personal favorite here) – in the name of bringing us jobs (in numbers hugely exaggerated by industry) and clean fuel to help curb global warming (an outrageous lie of which methane releases from fracking operations prove to be a lie). Cleaner, meanwhile, which fracking uses and wastes by the millions of gallons, is more valuable than oil. This is not hyperbole. It is fact. As the Pentagon, or T. Boone Pickens, or Halliburton, all of whom or which are quietly acquiring whatever aquifers are not being rapidly troyed by frackers.

Water more Valuable than Gas

"Water's more important than gas," Greenwood liked to say. "Once you ruin the water, you don't have nothing left."

As a punch line, Terry Greenwood, with his grizzled beard and haunted, melancholic eyes and visage, looks like one of those homeless street prophet anachronisms that is so easy to ignore when you're coming out of a Starbucks, say, or on your way to shop for some shiny new s***. I will just hope, along with you, that he's not a prophet; but I won't bank on it. Smart investors will put their cash in fracking operations and cancer clinics, then pray that they live a long and healthy life. They won't think about the poor bastards living

Fracking Acrostic

by Ken Jones

ertic farms poisoned by its chemical swill
anch land ruined as the cattle fall ill
gainst these Mother Earth despoilers stands
ases won by The Matthews' Firm Hand.
iss our air goodbye to its hydrogen sulfide
ito the ground flows the methane-no place to hide
ow these first verdicts can open debate
ive us hope the rape can stop before it's too late

Resources:

<http://nofracking.com/>

<http://www.texassharon.com/>

[Obituary of Terry L. Greenwood](#)

[Fracked Farmer dies of Rare Brain Cancer](#)

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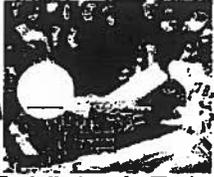
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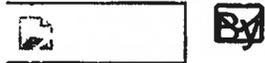
Teasdale will wrestle in Par Games in Cuba

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Published: February 19, 2013 - Updated: February 20, 2013 11:12 pm

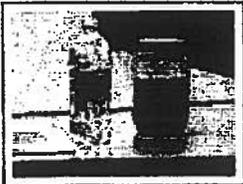
Residents testify to lack of DEP oversight at policy hearing



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Mt. Pleasant Township neighbors Chris Lauff and Kim Staub testify before a House Democratic Policy Committee hearing Tuesday.



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Five Pennsylvania residents, including two from Mt. Pleasant Township in Washington County, testified before a House Democratic Policy Committee hearing Tuesday that the state Department of Environmental Protection has failed to provide the necessary oversight on natural gas drilling.

Neighbors Kimberly Staub and Chris Lauff said since natural gas drilling took place near their homes on Port Cherry Road, they are left wondering if they will suffer health problems someday as a result of the activity.

Lauff set a jar of muddy water on the table in front of him to demonstrate the condition of his well water. The natural gas company did admit responsibility for his water loss, and Lauff has since connected to a public water supply.

But Lauff said the DEP fails to abide by its own Best Management Practices when it comes to dealing with the drilling industry.

No one from the DEP attended the hearing, which state Rep. Jesse White, D-Cecil, termed "a great disappointment." White has introduced House Bill 268 that would require full disclosure of the department's test results.

DEP spokeswoman Katy Gresh said the DEP has responded previously to White on that subject.

It would be irresponsible for DEP to provide homeowners with raw data that has not been quality-assured and quality-controlled. Raw data is, quite simply, unreliable and not valid in the eyes of any laboratory, public or private," she said.

At the end of the 2 1/2-hour hearing, White said, "what we heard from everyone today was not an attack on drilling. I'm sure we realize there are economic benefits to drilling. I think what we're hearing more than anything is that the DEP needs to step up and be the enforcement agency that homeowners and even the industry wants them to be," he said.

Staub, who contacted the DEP when she noticed an odor from an impoundment last fall, has yet to receive any case evaluation about her farm and its air quality despite repeated calls to the DEP.

Lauff, who said a toxicologist told them the only treatment for his exposure to chemicals is avoiding them, said his family has lost the enjoyment of their home. He supports the need for America to become energy independent if it is done safely and responsibly.

“The question we should be asking ourselves is not who is in favor of or who is against natural gas drilling, but rather, is there proper oversight to ensure the healthy and safety of the residents of our commonwealth by our state officials and government who are tasked to do so?” he asked.

Rep. Kevin Boyle, Philadelphia County, said, “I apologize for DEP. As Pennsylvania citizens, you deserve better.”

Judy Armstrong Stiles, who wore a white cotton glove on her right hand because of skin problems she believes are associated with natural gas drilling, said her family was forced to move from their Bradford County home.

She told the panel that medical officials determined they had heavy metal poisoning, which she attributes to numerous chemicals in their drinking water from a gas well pad three miles away.

Her voice cracked when she explained her husband ended his life last year after being unable to deal with pain from intestinal cancer.

“I just want to know where were those agencies that were supposed to protect us?” she asked. “We paid thousands of dollars we couldn’t afford to test our water. I think that was DEP’s job.”

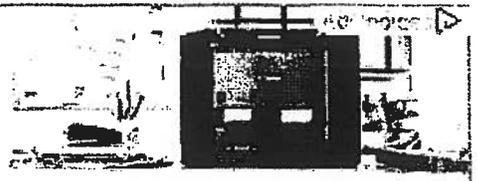
Earthworks eastern program coordinator Nadia Steinzor said DEP’s decision to provide only partial water test results to homeowners is a significant lapse in responsibility and transparency.

She called on the state legislature and DEP to make a number of changes, including providing testing prior to drilling activity and making that information publicly available, expanding parameters on air and water testing, and collecting comprehensive data on complaints.

Melissa Troutman, Mountain Watershed Association’s outreach coordinator, said the policy for oil and gas extraction in Pennsylvania appears to be “permit first, test later.” No new permits should be awarded until a thorough investigation of the department’s policies and procedures is conducted, she said.

Also speaking were Steve Hvozdoch, policy associate with Clean Water Action, and Erika Staaf, a clean water advocate for PennEnvironment.

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IWLA-Harry Enstrom Chapter

OUR MISSION: To conserve, maintain, protect and restore the soil, forest, water, and other natural resources of the United States and other lands; to promote means and opportunities for the education of the public with respect to such resources and their enjoyment and wholesome utilization.

Dallas Slagle-Newsletter Editor

President's Notes

Our chapter has over 100 members and growing. We have 14 new members since September. We are on the right path and plan to continue to move forward in our fight for clean air and water. We will push for the state legislature to protect our air and water. Let us all work together for the common good for all the people. I would like to thank each and every member for their support. I know that many of you cannot attend the meetings but your membership is vital in our moving forward. We all know that numbers do speak and if you can bring in new members our voice will get louder.

Our Newest Members:

Eva Westheimer, Caitlin McCoy, Sue Hecht, Greg McDonald, Charles Schury, Michael Hughes, Tammy Adams, Tom Hritz, Peyton Chambers, Jack Schuessler, Jeffery Schuessler, Dale Trader, Sophia Trader, William Hess.

Again, please accept our thanks for your membership and commitment to the Harry Enstrom Chapter of the Izaak Walton League of America.



- *Who we are Presentation*
- *Ryerson & Duke Lake*
- *Fishing*
- *Ike Meeting Participation*
- *National Mid-Winter Meeting*
- *IWLA Division State Meeting*
- *Peyton Chambers*
- *Radiation*

Act 54: Deep Mining Impact Report

The Act54 report uncovers that over 40% of streams that were undermined in PA from 2008-13 experienced significant flow loss or pooling. The ability to repair damage to streams that have been undermined and have experienced subsidence impacts remains largely unknown.



Who We Are

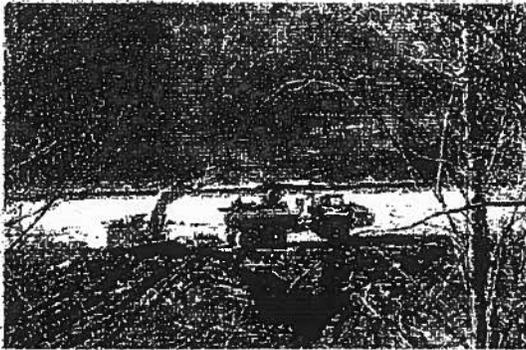
The Chapter Board of Governors has been working on a new presentation explaining the inception and purpose of the IWLA and Harry Enstrom Chapter. We are planning on going to local government officials, schools and sportsmen organizations discussing the IWLA. We have a great reputation in the tri-state area and beyond but we need to build our footprint in Greene County.

Ryerson & Duke Lake

The work is underway to remove the silt from Duke Lake. The silt is being hauled to the Mather Gob pile and the reclamation of the pile is underway. President Dufalla and members Ray Rutan, Al Churney and Jan Churney have been monitoring the situation. The removal process is coming along nicely and the future is getting brighter. If we look back, the idea of the silt being placed on the Mather Gob pile was presented by the IWLA several years ago. The IWLA has been actively trying to get the Mather project finished since 1988. We have been working the Duke Lake project since the dam failure in 2005. The Mather project was set back years when \$4.9 Million dollars of growing greener money was spent with minimal results.

Fishing

The slight warming trend that happened in early February brought out many fishermen in our trout stocked area. The fishermen were doing well however the arctic blast has slow everything down. Along with this the IWLA has again applied for a grant of \$3000.00 to help stock fish for our Kids' and Ladies Day event.



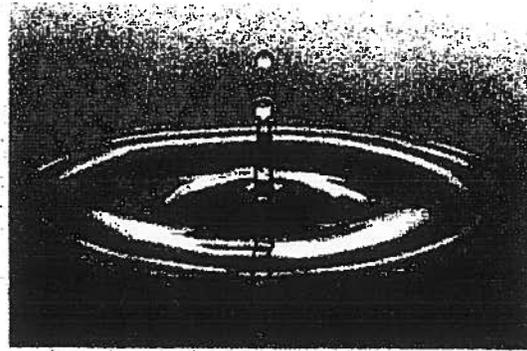
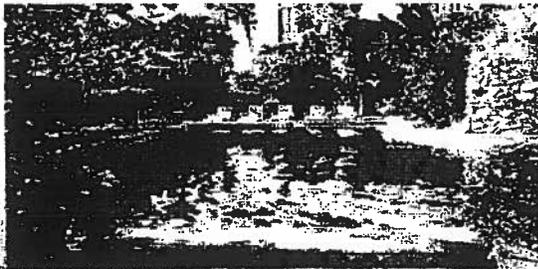
Ikes Attend Meetings

Local Meetings

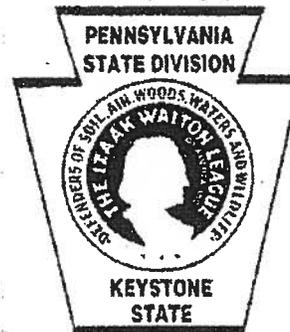
Over the past several weeks many Ikes have been involved in attending meetings and explaining our concerns with water issues. Ken Dufalla has been attending the Greene County Soil Conservation meetings and keeping their members up to date on the water quality issues in the area. Ken Dufalla, Eva Westheimer and Mike Hughes attended the latest meeting of the Tri-County Joint Water Authority and explained the difficulties of treating raw water coming into the plant. The treatment plants are not designed to remove chemicals such as Bromides and Strontium along with Radium 226, Radium 228 and Thorium. Along with Tri-County, the overwhelming majority of the 41 other reporting water suppliers have similar or worse problems with supplying clean water. Ken Dufalla and William Hess attended the East Bethlehem Commissioners meeting and explained some of the problems the area is facing with our water. Future meetings may be forthcoming.

National IWLA Mid-Winter Meeting

State Director Chuck Hunnell recently attended the mid-winter meeting of the National IWLA in Fort Myer, Florida. Chuck was able to explain our water and air situation to many of the members and gained massive support for our issues. Chuck was also informed the National is aware of our issues and they support our work 100%. Chuck stated that we were complimented on the work of the Harry Enstrom Chapter and the work of our chapter should be a model for all chapters in dealing with conservation issues. We thank Chuck for his efforts. Keep up the great work.



Safe water - Safe Life



State Division Winter Meeting

The State Division meeting of the IWLA was held in Bedford, Pa. The Harry Enstrom Chapter was very well represented. Of the 20 state members attending the meeting, our chapter had 9 members present. Remember, our chapter has to travel some of the longest distances to many state meetings: The following members were present; Randi and Peyton Chambers, Clyde and Donna Cooper, Alex Shields, Dallas Slagle, Ken Gayman, Chuck Hunnell and Ken Dufalla.

Our chapter tried to gain support for the National Policy on Fracking but for some inexplicable reasons several chapters will not commit to supporting this National Policy. The feeling presented was it is a Harry Enstrom exclusive problem when in fact the resolution that became policy was a State resolution. We are still pursuing the issue and now currently have the support of 4 chapters.



Peyton Chambers

Our chapter is proud to announce that our youngest chapter member, Peyton Chambers, 16, a sophomore at Waynesburg Central High School, was selected as a National Youth Delegate for the 2015 Washington Youth Summit on the Environment. Chambers will be one of a dozen students to represent Pennsylvania at the Summit. The Washington Youth Summit on the Environment will be hosted by George Mason University from June 28 to July 3.

The Harry Enstrom Chapter and the generous donations of three chapter members were able to provide the funding for her participation.

We wish Peyton the best of luck on her trip and look forward to her post summit report.

Radiation

On April 10, 2014, the DEP did water testing on Ten Mile Creek near Clarksville area and the Clyde Mine discharge. The tests were requested by the IWLA on November 4, 2013. The results of the testing were quite shocking to say the least. High levels of Radium 226, bromides, strontium, sodium, TDS, electronic conductivity and some uranium were found from the discharge itself. An example of this high level of was Radium 226 at 301 PCI/L when the drinking water standard for Radium 226 and Radium 228 combined is 5 PCI/L. In the stream above the Clyde mine discharge, high levels of Radium 226, Radium 228, and thorium were found. The IWLA has sent these results to the EPA and the PA Fish & Boat Commission. The FBC was asked if the water is safe to stock trout in the stream and the DEP was asked as to the source of these elements. As of yet, we have no word back on these questions. The results did spark the interest of the West Virginia Research Institute and the EPA. Only time will tell if anything comes of the results.



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Press Coverage

Air

Fracking's Air Pollution: Disgusting, Toxic and Legal – December 18, 2014

Water

Noise & Light

Stress

Health Diary

3 Steps You Can Take Now

Medical Topics

FAQ

Laura Peltier with **Baltimore Fishbowl** reports on how EHP "sprung into existence to provide health care and support for people living near gas extraction." In addition, the article touches on EHP's Speck Monitor, which monitors particulate matter.

Senators Ask How to Address Fracking-Related Health Issues – October 1, 2014

Jon O'Connell from the **Wilkes Barre Times-Leader** reports on a senate hearing which discussed the inefficiency of state agencies in tracking and reporting data on natural gas production. At the hearing, those who testified said that "private community-minded interests have been working to fill in the gaps and find help for those who feel natural gas development may have caused them to become ill."

Yale Study Shows Potential Link Between Health Ailments, Gas Wells – September 11, 2014

Emily Petsko with the **Observer Reporter** reports findings from a Yale University study. The study showed a potential correlation between the proximity of well sites and symptoms such as dermal and upper respiratory symptoms. Recently, researchers have been drawn to Pennsylvania – especially Washington County – because of the high level of unconventional natural gas development. Brian Schwartz, head researcher for the ongoing John Hopkins study stated that, "Pennsylvania is really a very, very important state to study – one of the most rapid of the states to develop this industry." He continued by saying, "What's more important about Pennsylvania is that lots of people live in the counties where this is going on."

SWPA-EHP: A Model for Fracking States – August 15, 2014

From the **Styx** by Peggy Tibbets states that, "EHP is a bunch of scientists and medical professionals who decided to address the public health impacts head on with or without the government. With the help of private funding they conduct their own research, air & water monitoring, health databases, and provide medical advice and assistance to people in impacted areas." She goes on to state "these professionals said, 'Forget the studies, let's deal with the real problems right in front of us.' They responded to a public health crisis."

Air Monitors Provided to Residents Near Marcellus Sites – July 19, 2014

Emily Petsko reports for the **Observer-Reporter** about residents who have received Speck air quality monitors in Washington County. The article notes that EHP has "set up a new protocol in conjunction with Yale University to study the air quality during emergency situations, such as the incident in May when lightning struck the MarkWest plant and caused a gas leak."

With No Health Registry, PA Doesn't Know the Impact of Fracking on Health: Other Studies are Underfunded – April 30, 2014

Natasha Khan reports for **PublicSource** on the fact that there is no state-funded health research of shale operations in Pennsylvania while making note of EHP's smaller, community-centered health projects. Observing that EHP, uses "public-health researchers, toxicologists and medical professionals to study health impacts from fracking, (and) also staffs a nurse practitioner who evaluates people who think they've been sickened by drilling," Khan states that "It may be the only outlet in the country doing health-related research and providing medical attention in shale communities."

Khan goes on to report that: "In June, the Health Project published a health survey of people who live near drilling sites in Washington County. Between 2012 and 2013, the project found 27 cases of sick people who believed their symptoms were caused by air and water pollution from nearby drilling. Their symptoms included skin rashes, eye irritations, breathing problems, headaches and nosebleeds. Researchers and medical professionals at the project continue to monitor them, Rippel said.

In March, the project released a study that suggests common air-monitoring techniques used by state and federal regulators don't protect the public against health threats. The techniques fail to record harmful air emissions that spike during different stages of gas-drilling operations, researchers found. "And we absolutely feel that those spikes are associated with poor health outcomes," Rippel said."

Dangers of Fracking the topic at Villa Maria – April 28, 2014

Mary Grzebieniak of the **New Castle News** reports on a presentation EHP's NP-C Family Nurse Practitioner, Suann Davison, gave at Villa Maria last week before an audience of 150 concerned community members. The former Major in the U.S. Air Force stated, "gas and oil drilling puts hazardous chemicals into the environment through seismic testing, wellpad construction, drilling, fracking, wastewater, flaring and gas production and processing." Davison further noted that "common health effects from these chemicals include neurotoxicity, skin irritation, respiratory problems and gastrointestinal or liver damage."

Texas: When Fracking Comes to Town – April 27, 2014

Alex Halperin with **Al Jazeera America** reports on Northern Texans who live near gas wells and their fears for their health. EHP's Dave Brown is quoted as stating: "The gas industry has provided health data on its own workers who labor on gas pads and bear the greatest risk of exposure to toxins. That is where a proper health study would begin."

Air Monitoring in Fracking Areas Fails to Detect Spikes in Toxic Emissions, New Study Says – April 3, 2014

Lisa Song and Jim Morris for *The Center for Public Integrity* reports on the Article "Understanding Exposure From Natural Gas Drilling Puts Current Air Standards to Test", written by EHP's public health experts and published in the peer-reviewed journal, *Reviews on Environmental Health*."

In Fracking Fight, a Worry about how Best to Measure Health Threats – April 1, 2014

Naveena Sadasivam of *ProPublica* reports on EHP's Article "Understanding Exposure From Natural Gas Drilling Puts Current Air Standards to Test". written by EHP's public health experts and published in the peer-reviewed journal, *Reviews on Environmental Health*."

NGO's Address Health Impact of Extraction of "Shale Gas" – March 19, 2014

Maria Saldana of Mexico's *El Universal News* reports in Spanish on presentations made by EHP's Raina Rippel, Frac Tracker's Samantha Malone, and the Izaak Walton League of Pennsylvania's Ken Dufalla to the State Department Roundtable on Unconventional Natural Gas Development sponsored by the League of Women Voters. Click here for a rough English translation of Ms. Saldana's report. For a copy of the prepared written remarks of Raina Rippel click here.

Act 13 ruling Buoy Residents near Trax Farm Gas Well: Union Township Homeowners Want More Local Control – Feb 22, 2014

Anya Litvak of the *Pittsburgh Post-Gazette* writes about the local community near the EQT gas drilling at the Trax Farm and their response to a new ruling by the Pennsylvania Supreme Court declaring unconstitutional parts of Act 13, which limited local zoning control of natural gas wells. The article notes that EHP "has installed air monitors in several homes..."

Meeting looks at Drilling Near Schools – Sept 27, 2013

John Bojarski, staff writer for the *Butler Eagle* reports on a community meeting held in Butler, PA sponsored by Marcellus Outreach Butler to discuss issues related to flaring near Summit Elementary School in the Butler School District. EHP's Raina Rippel advised the community residents that homeowners should consider where facilities are. "If they are two miles away or one mile and not downwind, she said there is not much to worry about...However, she said homes within a half mile of natural gas facilities could face pollutants. "Anything within a half mile, I'd be concerned about it." Rippel also noted "that weather and other conditions matter. Cloudy days with no wind cause more pollution to stay near the earth's surface and near homes. Pollutants also are more likely to stay near the surface at night."

Study: Gas Wells Leave People "Vulnerable" to Health Hazards – Sept 27, 2013

Rick Shrum, Business reporter for the *Observer Reporter* reports on the results PennEnvironment Research & Policy Center released in a report titled "The Spreading Shadow of the Shale Gas Boom: Fracking's Growing Proximity to Day Cares, Schools and Hospitals" which found 462 day care centers, 446 schools and 15 hospitals are located two miles or less from a permitted fracking well site in Pennsylvania. "We are putting vulnerable populations, particularly children, in the red zone," Raina Rippel said in

a news release. She is the director of the Southwest Pennsylvania Environmental Health Project, based in Peters Township. "Given known asthma rates in Pennsylvania," Rippel continued, "the proximity of gas drilling industrial activities to care facilities and schools, and the known health impacts of pollution such as diesel emissions, we know these vulnerable populations are at risk."

Understanding Fracking: Arguments for and Against Natural Gas Extraction – Sept 9, 2013

Samantha-Rae Tuthill, staff writer for AccuWeather.com reports that "Those in the public health sector are worried about the untested long-term results on residents who live near fracking sites due to potential for the fracking chemicals to create air or water pollution. "It's essentially an experiment," Michael Kelly, media liaison for the Southwest Pennsylvania Environmental Health Project (EHP) said. "There are so many unknowns about this that we're creating a mass health experiment, and it's being conducted without the consent of the people who are most likely to be hurt by it."

Parents Worry About Flaring Natural Gas Well Near Summit Elementary School – Sept 7, 2013

Kate Malongowski, staff writer for the Butler Eagle reports on concerns over a flaring natural gas well about 900 feet from a school playground in Butler, PA. EHP was contacted by concerned parents and residents in the area and issued the following one page advisory statement. Stating "From an air pollution model that we have developed, we know that under many conditions emissions from a well site would likely reach an area within 360 yards of it. This means that pollutants from the flaring site could have easily traveled to the school grounds. These pollutants could have been emitted at concentrations that are of concern."

Health Effects of Gas Drilling Under Study – August 25, 2013

Kevin Begos of the AP wrote this article, which first appeared in the Washington Post but because it was sent out "on the wire" by AP ended up getting carried in literally dozens and dozens of newspapers – some from as far away as New Zealand. Kevin incorrectly reported as a "study" our successfully completing a case series of health impacts plausibly related to gas drilling activities, including both water and air pollution, given either a temporal (time) and/or spatial (distance) relation to residents' and their health symptoms. In the case series, we found a plausible link between industry activities and negative health outcomes, primarily in adult populations. To grasp some of the negative spins/attacks put out by Industry Supporters in response to this story we would refer readers to our Disinformation Watch. Just two days later, in support of EHP's findings, a group of Health Experts in New York released the following "Statement on the Preliminary Findings from the Southwest PA Environmental Health Project" which was reported in the following article New York Group Weighs In on Pennsylvania Health Study.

PA House Democrats Seek More Drilling Safeguards – May 4, 2013

Robert Swift, Harrisburg Bureau Chief for The Times-Tribune reports on the PA State House Democrats hearing on expanding environmental and public health safeguards for gas drilling. EHP's Jill Kriesky testified that "The state needs to create a health registry of people who report plausible symptoms related to drilling...Such data is invaluable to public health researchers, toxicologists and

physicians who seek to identify specific symptoms associated with exposures to various stages of the gas extraction process.”

For a copy of EHP’s Jill Kriesky’s full statement please [click here](#).

The Downwinders: Fracking Ourselves to Death in Pennsylvania – May 2, 2013

Ellen Cantarow’s latest article has been cross-published in *The Nation Magazine*, *TheHuffingtonPost.Com* and *TomDispatch.Com*. Cantarow reports that “Pennsylvania farming communities are being turned into huge, open-air laboratories by energy companies...with ordinary people serving as its guinea pigs. And those people are paying a heavy price: mystery illnesses, dead animals, polluted water, land made worthless, and the loss of a way of life.” EHP’s Dave Brown is quoted at some length in the article with Cantarow concluding: “In the vacuum left by the state’s failure to offer protection to those living in fracking zones, volunteers, experts like Brown, and fledgling organizations like the Southwest Pennsylvania Environmental Health Project have become the new protectors of citizens’ health.”

Environmentalists Raise Fracking Concerns – April 6, 2013

Brenda J. Linert, Business Editor of the *Tribune Chronicle* reports that EHP’s Associate Director, Jill Kriesky was one of more than a dozen speakers and panelists in day-long conference held in Warren, Ohio and titled “Unconventional shale drilling. What we know, what we don’t know, what we need to know to move forward.” Topics included health, environment, economics and water safety. In her segment, Kriesky spoke about the equipment her agency helps provide to monitor things like air and water quality and the attention a nurse practitioner focuses on symptoms reported by residents like rashes, abdominal pain, stress and anxiety.



Organic Farmers Struggle to Protect Land from Encroaching Fracking – April 2, 2013

Eco Watch reports on a March 28, 2013 panel discussion in Pittsburgh, Pa., on farming and fracking in which EHP’s Associate Director Jill Kriesky pointed out that without more research into the impact on food production and without greater transparency by the industry and the government it is difficult to track issues related to food consumption. She noted: “There’s no fence line here. You can’t put a fence around

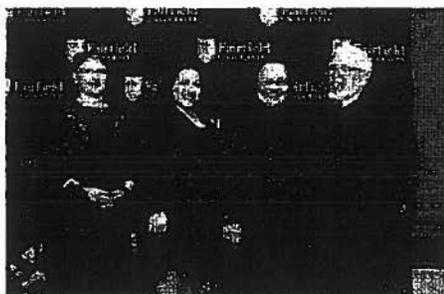
what's happening" in the communities affected by the shale gas rush."

Assessing the Health Risks of Fracking – March 9, 2013

The Southwest PA Environmental Health Project (EHP) was asked to share our public health experiences in SWPA with the New York State Health Commissioner Nirav Shah and his team as they review possible health impacts of fracking. Our response ran as an Op-Ed Commentary in the Albany Times Union under the By-Line of EHP's Public Health Toxicologist David R. Brown, D.Sc.

EHP's Dr. David Brown wins the Rev. Martin Luther King Jr. Vision Award – February 13, 2013

Fairfield University honored Dr. David Brown, a long-time Applied Ethics Adjunct Professor and an internationally recognized public health toxicologist with its prestigious Rev. Martin Luther King Jr. Faculty Vision Award. Citing "his pioneering efforts to integrate the sciences of toxicology, risk assessment, and environmental exposures to help protect vulnerable populations from serious environmental health problems" it was noted that he is a founding member of the **SWPA Environmental Health Project**. As stated in his nomination, "Dr. Brown's modest unassuming manner should not obscure the fact that this is a person in our midst who is guiding national policy on emerging environmental issues."



Pictured (left to right) are Vision Award honorees Wylie Smith and Sharon Pedrosa, Keynote Speaker Diane Nash, and Vision Award honoree Dr. David Brown.

MOB's Blog "An Urgent Call to Action from David Brown" – November 13, 2012

Marcellus Outreach Butler's (MOB) Blog on the The Third Annual Conference on the Health Effects of Shale Gas Extraction, held on November 9, which was hosted by the University of Pittsburgh Graduate School of Public Health included the following comments: "The session I found most informative was the last session of the day, which focused on guidance for persons with health concerns from water and air exposures during natural gas extraction. David Brown, a public health toxicologist..., spoke about the lack of a public health presence in the evaluation of exposure hazards and health concerns related to this gas extraction process. Not only do medical people not know what to do, they do not know what they don't know, according to Brown. He ... emphatically stated when you have uncertain results and significant exposure, you stop the exposure...."

Dave Brown's entire presentation at the November 9, 2012 Third Annual Conference on the Health Effects of Shale Gas Extraction is available online here.

Top 20 Health Concerns Related to Fracking – October 17, 2012

EcoWatch reports on a series of meetings between medical professionals, scientists – including SWPA EHP's Public Health Toxicologist Dr. David Brown – and senior staff from the New York Department of Environmental Conservation (DEC) and New York Department of Health as well as representatives from the Governor's office and the release of a summary report of those meetings which identifies 20 important public health concerns related to gas drilling.

"When there's a public health emergency, the primary objective is to stop the exposure," says Dr. David Brown, a public health toxicologist with the Southwest Pennsylvania Environmental Health Project which is helping sick people get medical care in areas of Pennsylvania with active fracking operations. "We try to help people whose water is contaminated and whose air is severely degraded. We tell them to test their water, stay inside, keep their windows closed, take their shoes off, that kind of thing. But really, at this point there are situations where there's not much we can do for them. There's no way for impacted individuals to stop the exposure."

Heroic Endeavor: NRDC Community Fracking Defense Project – October 4, 2012

On Eccentric, the official blog for the sustainable food, water and energy programs of the GRACE Communications Foundation, Kai Olson-Sawyer, Research and Policy Analyst reports on NRDC's launch of its Community Fracking Defense Project. He concluded his comments by specifically noting that "We can't forget to mention the great work of the Southwest Pennsylvania Environmental Health Project (SWPA-EHP)... Their website provides invaluable resources for those in dire and immediate trouble in the vicinity of active shale extraction and can serve as a model for the rest of the nation."

Public Health Impacts Stemming From Fracking – September 21, 2012

On September 21, 2012 SWPA-EHP Director, Raina Rippel, made an important presentation at a conference entitled "The Potential Health Effects of Hydraulic Fracturing" held at the College of Physicians of Philadelphia.

In this clip (below) Raina Rippel emphasizes the Public Health ramifications of natural gas drilling: "There are tangible impacts. There is empirical evidence.... There are health impacts, there are quality of life impacts, they are real, we are seeing them and we need to figure out how to address those."



Subsequent online coverage of this event has proven quite divergent. Consider these two examples: In a blog entitled "Days of Fracking Rage Sept 24, 2012" Raina Rippel's actual presentation was reported in the 7th and 8th paragraphs of the story pretty much *verbatim*.

While in an article by Taunya English of Newsworks WHYY entitled "In Philly symposium experts debate health effects of fracking.", emphasis was placed — beginning with the headline — on whether public health impacts even exist. One needs to drill down in the article and read the comments section from event attendees to learn that the bulk of the discussion was not on debating the existence of public health impacts but rather on exploring options for how to deal with the public health impacts. The panel's complete presentations can be found on YouTube.

Unconventional Gas Extraction Threats – Fall, 2012

In the Fall, 2012 Issue of the "New England College of Occupational and Environmental Medicine Reporter" SWPA-EHP's medical consultant Leslie Walleigh, MD, MPH warns that "Unconventional gas extraction, made possible by recently developed technologies, carries the risk of widespread air and water contamination with chemicals recognized as hazardous to human health."

Studies on Impact of Drilling Seek Funds – September 2, 2012

Kevin Begos of the Associate Press reports on a "much-publicized plan by two Pennsylvania health companies to study possible impacts from gas drilling" pointing out that "it is only in the preliminary stages as the groups continue to look for major funding" while noting that "the next big push" by SWPA-EHP which has "been examining similar questions" will be "on air quality." "Raina Rippel of the Southwest Pennsylvania Environmental Health Project says "We have plans in the works to look a personal monitors people could wear" to detect harmful levels of natural gas."

SWPA-EHP Releases Guidelines to Monitor, Test Private Wells – June 18, 2012

Amy Freidnerberger from the Pittsburgh Post-Gazette Pipeline reports that the SWPA-EHP has "released a set of guidelines for monitoring and testing private wells in the effort to address the concerns of Washington County residents who are worried about the safety of water from private wells near natural gas drilling locations".

"The report, "Well Water Contamination: SWPA-EHP Ranking System and Monitoring System" includes a monitoring and ranking system for residents to use in order to help them know what actions to take if they determine levels of contamination in well water."

Sick From Fracking? Doctors, Patients Seek Answers – May 15, 2012

In a week long special series "The Fracking Boom: Missing Answers", NPR explores the questions surrounding natural gas drilling and fracking. With more than 200,000 wells currently drilled, people living on the front door steps of the drilling have raised the question: Are these wells creating harmful pollutants? Rob Stein, Correspondent and Senior Editor on NPR's Science Desk explores why there isn't an answer yet by looking at a rural clinic in Burgettstown, PA which recently had to close its doors. The clinic had sought out the assistance of the SWPA-EHP, and David R. Brown and Raina Rippel are interviewed in the story.

Is Pennsylvania ignoring health issues on shale drilling? – May 13, 2012

This Associated Press article discusses the slow response time of PA Health Officials to community health complaints. Dave R. Brown makes the point that due to the lack of any additional funding budgeted to the Health Department to investigate and respond to this increased workload: "I am not surprised that their protocols are...difficult to get in place....I can tell you right now, you cannot do this on a shoestring."

Docs say Drilling Law Hurts Health – April 11, 2012

The Associated Press talks to public health leaders, including David R. Brown and John F. Suggs of the SWPA-EHP, about the new PA law requiring doctors to sign a confidentiality agreement in return for access to proprietary information on chemicals used in the hydraulic fracturing and how vital research money into the health impacts was stripped from the law at the last minute.

Marcellus: Health Impact "Searching For Common Ground" – March 29, 2012

This episode of WQED's "Pittsburgh 360", takes a look at the impact Marcellus Shale drilling is having on our region. Tonia Caruso finds out how one group (SWPA-EHP) is addressing the health concerns of drilling in Southwest Pennsylvania. The episode starts at 12:10 into the video.

"Is Fracking Making People Sick?" – March 23, 2012

Pennsylvania Public Radio program "The Allegheny Front" and Public Radio International "Living on Earth" report on the possible health effects of fracking and interview Raina Rippel, Project Director of SWPA-EHP amongst others.

Center Seeks To Shed Light On Fracking And Health – March 19, 2012

Jon Hurdle notes in his AOL Energy Blog that "In the continuing debate over whether fracking for natural gas contaminates drinking water, a new health center in the midst of Pennsylvania's drilling country may provide fresh clues."

Cuomo and Corbett Ignore Health Concerns from Gas Fracking – March 9, 2012

Peter Mantius Shale Writer for the DC Bureau cited the Center's work and quoted David Brown; "We're taking a public health approach to gas drilling," said David R. Brown, an SWPA-EHP organizer and former supervisor of superfund sites for the CDC. Brown has also served as chief of epidemiology for the Connecticut Department of Health. "We want to treat the people, not track the cause ... to break the train of transmission. That's what you do in any outbreak."

Nonprofit to Work With the "Canaries" in the Shale Mine – Feb 24, 2012

The Nonprofit Quarterly's Louis Altman reports on the SWPA-EHP new services and quotes local pediatrician Dr. Helen Podgairy who says "she doesn't know "what we should be on the lookout for," but she doesn't want her young patients to serve as "the canaries in the coal mine," or, in this case, as canaries in the shale."

New Pennsylvania group leading the way in first-of-its-kind health care for oil and gas communities – Feb 21, 2012

Natural Resources Defense Council (NRDC)'s Senior Policy Analyst Amy Mall praised the organization in her blog saying "Their staff experts bring decades of eminent experience, extensive education, and priceless knowledge and environmental health expertise to this issue. I am glad there will now be a new resource to help families being harmed by natural gas activities in southwest Pennsylvania, and hope it is a model that can be replicated elsewhere."

First-ever shale health office opens: Nonprofit program to assess effects of rampant gas development – Feb 21, 2012

Don Hopey, who has been covering environment issues for the Pittsburgh Post-Gazette since 1992, writes about the Launch of the Health Center in McMurray, PA noting that it is the "first-of-its-kind medical program to assess both the individual and public health impacts of widespread Marcellus Shale gas development".

Shale Health Office Available for Southwest PA Residents – Feb 21, 2012

Sam Malone from FracTracker gave the organization a wonderful welcome noting that "Raina and her team are fantastic resources, enabling us to better understand localized concerns and impacts and providing an outlet through which we can share the information we gather during our data analyses."

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