



pennsylvania environmental council

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August 13, 2018

Environmental Quality Board
P.O. Box 8477
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Submitted via e-mail to RegComments@pa.gov

Re: Unconventional Well Permit Application Fee Amendments [48 Pa.B. 4100]

The Pennsylvania Environmental Council (PEC) appreciates the opportunity to submit comments with respect to the Department of Environmental Protection's (Department) proposed amendments to permitting application fees for unconventional well operations, as published in the Pennsylvania Bulletin on July 14, 2018 [48 Pa.B. 4100].

For the Department to fulfill its mission and responsibilities to the citizens of Pennsylvania, it must have sufficient funding for its operations. Given the long-standing decline in support from the General Fund, the Department has been placed in a difficult position to ensure that it has adequate capacity to meet its mandated roles.

For that reason, we support the proposed permit fee amendments, though we recognize the significant additional costs placed on the regulated community, as well as the fact that this proposal does not resolve uncertainty with respect to the sufficiency of future revenues. Given the unpredictable nature of permitting volumes, what may be sufficient today could fall short in the very near future.

Unfortunately, the sole option provided to the Department to support its work is through permitting fees. We encourage the Department and other stakeholders, including the Legislature, to identify and authorize additional options, as well as opportunities for sensible cost savings or other efficiencies, that could provide more stable funding for the agency while maintaining protections and balancing costs for the regulated community. PEC would welcome the opportunity to help advance that work.

It is our hope that these additional revenues will support the Department's ongoing efforts to increase efficiency both in ensuring environmental protection and meeting the needs of communities, the regulated community, and the citizens of the Commonwealth.

Thank you again for the opportunity to comment.

Respectfully submitted,



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