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Kathy Cooper

From: ecomment@pa.gov
Sent: Monday, August 13, 2018 10:05 PM
To: Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com;
 environmentalcommittee@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: Unconventional Well Permit Application Fees



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Unconventional Well Permit Application Fees.

Commenter Information:

Ralph Kisberg
 Responsible Drilling Alliance (ralph@responsibledrillingalliance.org)
 1736 Almond St.
 Williamsport, PA 17701 US



Comments entered:

August 13th, 2018

Via electronic mail RegComments@pa.gov

The Honorable Patrick McDonnell, Chairman
 Environmental Quality Board (EQB)
 16th Floor Rachel Carson State Office Building
 P.O. Box 2063
 Harrisburg, PA 17105-2063

Re: Proposed Rulemaking Unconventional Well Permit Fee Increases
 (#7- 542)

Dear Chairman McDonnell:

The Responsible Drilling Alliance (RDA), a 501 (c) (3) educational and advocacy coalition based in Lycoming County, appreciates the attempts by the Pennsylvania Department of Environmental Protection (PADEP) to ensure all natural gas and oil development in the Commonwealth proceeds in the safest, most protective manner possible. This will help to insure the health of our citizens and the value of our private and communal properties and vital natural resources which provide crucial ecological services to us all. For over 10 years now RDA has focused on supporting and attempting to enhance the agency's charge of protection of Pennsylvania's constitutional environmental rights. We believe the proposed unconventional well permit fee increases are a long needed step in the right direction.

Given the huge scope of the development that has accompanied the advent of unconventional gas extraction in the Commonwealth, we note and appreciate the EQB recognizing and filling much of overdue budget and staff needs of the Bureau of Oil and Gas through raising well permit fees a small percentage of total well development costs. It is a constant source of amazement to us that in this era of careful oversight and public scrutiny of any non-oil and gas land development, oil and gas development seems to reside in a different category. This vast and unwieldy development of deep shale formations is spread across a huge percentage of the Commonwealth yet continues, and will always continue, to proceed with no comprehensive planning required. What other economic activity gets away with revealing so little of the ultimate outcome of a permitting decision? So many additional land uses and environmental impacts are automatically set into motion once a multi-million dollar unconventional gas well is approved. Uses and impacts that are then absolutely impossible to avoid once permission is granted to spend an average of approximately \$8 million per well on a pad that will be a total investment of multiple \$10's of millions. Yet the industry complains about both the time it takes and the gnat's buzzing annoyance of this infinitesimally small proposed additional cost.

After 10 years of existence, is it is also still a source of amazement to us at RDA that the oil and gas industry is able to commit so little actual dollars to the functioning of our government that provides them the opportunity to operate in our Commonwealth, to go along with the much less than advertised actual jobs they produce here. With that in mind, we were pleased to read the comments submitted by the Marcellus Shale Commission President Mr. Spigelmyer. We anticipate they will surely give the EQB much needed comic relief as you finish the long process of getting closer to actually being able to pay for full cost of the oil and gas oversight program.

It is the RDA board's opinion that it is safe to say that the proposed increase in the unconventional well permit fee bears a quite reasonable relationship to the cost of administering this chapter, that no level of General Fund support should be necessary for administering this chapter, and that the fees proposed are neither excessive or prohibitive.

Thank you for the opportunity to comment.

Sincerely,

Board of Directors, The Responsible Drilling Alliance
Robert Cross, President
Barbara Jarmoska
Jon Bogle
Mark Szybist
Dianne Peeling
Roscoe McCloskey
Harvey Katz

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley