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Department of Environmental Protection
Policy Office
400 Market Street
P. O. Box 2063
Harrisburg, PA 17105-2063
www.ahs.dep.pa.gov/RegComments
or by e-mail to RegComments@pa.gov.

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

To Whom it May Concern:

My name is Kristin Landon, I am a life-long resident of Wyoming County. Currently I live in Lemon Township. I hold a degree in Electrical Engineering from Wilkes University, and I have spent 20+ years of my career working for the Wireless Telecommunication industry on siting towers and other infrastructure for the industry. I am a natural gas leaseholder, a stay at home mother of two young children, and I work full time as an engineering consultant.

I have been observing and experiencing first-hand the Marcellus shale development over the past four years. Within a two mile radius of my home I have six active well pads, with approximately twenty spudded wells, the Hirkey Compressor Station, and one freshwater impoundment. The closest well is within 2700' of my house. I want you to know that I actually feel, hear, see, and breathe Marcellus development twenty-four hours of every day.

I am writing this letter urging the quick passage of the revisions to the Chapter 78 Oil and Gas Wells Code. I have read reports on both industry and environmental comments from hearings in other parts of the state. Industry states the proposed regulations kill jobs. Environmentalists state the regulations are not strong enough. As I see it, these regulations will help create jobs in the local environmental and engineering firms that currently exist in Pennsylvania. The Industry will not stop drilling because of the Regulations- they are not prohibitive, so their argument about job loss is unfounded, in my opinion. On the other side, the Environmentalists want strict regulations that may impede Industry. The proposed Regulations are much better than what we have currently- so it is a benefit to the environment to enact these Regulations. We need compromise in the middle- which is what I think these proposed regulations represent. It is my understanding that both Industry and Environmental groups worked on roundtable subcommittee discussions about these regulations over this past two years. That was the time to debate and fight it out.

I want to express how critical it is to me as a resident leased landowner in the development area to have these regulations in place to better protect the health, safety, and welfare of my community. I live in a county and township that has no zoning or protections for landowners on any of these issues. I feel regulations are extremely important when you have an industry that has a large amount of operators- seventy-three- according to the DEP Executive Summary Document. Speaking for residents of the Shale region, we need action now and I urge no further delay.

I have specific comments in support of the sections identified below:

Section 78.15 Application Requirements: I am very heartened to see that the natural gas industry will be required to consult with the Pennsylvania Natural Heritage Program as well as be required to notify about the impacts to public lands, natural landmarks, historic properties and schools. While it is not as encompassing or as protective as it should be, it is a start and these regulations need to be approved quickly to afford some type of Endangered Species and public land protection.

In addition, in Section 78a.15 (f)(vii) I strongly support the addition of the notification zone for schools and playgrounds. I feel that the notification zone, however, would be better served by extending it to 2500 feet. I see a benefit for schools and playgrounds being adequately notified because I volunteer at Roslund Elementary School and currently they do fire drills, lockdown drills, and shelter in place drills to plan in the event of an emergency. It would be beneficial for the School Administration to know when a natural gas well will be close to their property- so they can tailor their emergency drill plans to an event that may have a greater chance of occurring- i.e. drilling spills, fire during construction, well-head blow outs. We have a duty to our children to keep them as safe as possible by allowing schools to have ample notification and plan contingencies. The 200' notification zone is not adequate enough- I feel a ½ mile radius is more warranted. These are children- they deserve more than 200' for notification. Keep in mind this is a notification provision- not a setback. The Industry should be supporting notification to schools in a ½ mile radius or greater, this does not inhibit their development at all and, in fact, makes them responsible corporate citizens. I would like to see this notification provision extended to hospitals as well.

78a.41 Noise Mitigation- I strongly support the addition of noise mitigation for well pad locations. I live near a well pad and my experience with noise has been unpredictable. Indoor noise levels from the pad have caused sleeping difficulty and inability to perform certain tasks relating to my telecommuting job. The vibration from drilling and the accompanying reverberating sound is at times insufferable. I am not exaggerating and I am not a person who complains about much. I dealt with intermittent drilling sounds and vibrations for over a year- during the Wyoming County Plushanski well pad drilling. On this particular site the Operator, Carrizzo, was drilling 9 horizontal wells. The drilling lasted for over a year. That is a very long time. Yes, I had noise during that entire year. I had to cancel some conference calls for my job, to move some family gatherings I had planned, and sleeping was difficult. I also had vibrations in my house where my area rugs would "walk" across the floor from the vibrations. Once the drilling was complete- the rugs stopped "walking" and all was quiet again. Noise is a big issue to Pennsylvania residents living in the Shale fields and should be addressed in these regulations. Please extend these provisions to existing well pads so that all may benefit.

Section 78.51 d2 Protection of Water Supplies

I fully support the clarification of language "IF, PRIOR TO POLLUTION, A WATER SUPPLY WAS OF A HIGHER QUALITY THAN REQUIRED UNDER PENNSYLVANIA SAFE DRINKING WATER ACT STANDARDS, THE RESTORED OR REPLACED WATER SUPPLY SHALL MEET THE PRE-POLLUTION QUALITY OF THE WATER" This language clarifies and further protects Pennsylvanian's water supplies.

78a.57a Centralized Tank Storage- I strongly support the addition of the new section, Centralized Tank Storage. Permitted tank facilities replacing open waste water impoundments are a reasonable approach in the drilling fields. Tanks are a superior method to storing flowback and produced waters during recycling operations as compared to open waste water impoundments. I find the noted setbacks

reasonably comparable to other established setbacks. Please ensure the proposed regulations at a minimum, move forward in the final regulation.

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

Best Regards,

Kristin Landon
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