

#2857

From: Jeanette MacNeille [jeanette@eclipseservices.com]
Sent: Monday, July 19, 2010 6:36 AM
To: EP, RegComments
Subject: CH 78 Regulations

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Dear Madam or Sir:

I am writing to comment on the proposed CH 78 Regulations. I support the following changes:

1) DEP's definition for cement currently sets a 24-hour compressive strength standard of at least **500 psi**. We should require an **additional** 72-hour compressive strength standard of at least **1,200 psi** across critical zones of cement.

2) DEP's definition for cement sets a 24-hour compressive strength standard of at least **500 psi**. I support requiring an **additional** 72-hour compressive strength standard of at least **1,200 psi** across critical zones of cement

3) Expanding the cement ticket definition to include: (a) a requirement for the operator to test the mixing water pH and temperature and note it on the cement ticket; (b) a record of the Waiting on Cement [WOC] time.

4) Revise §78.51(c) to read: Within 24 hours of the receipt of the investigation request, the Department will send a technical team to the field site to examine the situation and determine whether immediate action is needed to shut down operations.

5) DEP proposes a new requirement at §78.72 (c) that reads:
"(c) The controls for the blow-out preventer shall be accessible to allow actuation of the equipment in the event of an emergency. Controls for a blow-out preventer with a pressure rating of greater than 3,000 psi should be located a safe distance from the drilling rig." I support adding the requirement that all wells to be drilled with a Blow-Out Preventer once the surface casing is installed and cemented. No exceptions should be allowed.

6) DEP proposes a new requirement at §78.72 (c) that reads:
"(c) The controls for the blow-out preventer shall be accessible to allow actuation of the equipment in the event of an emergency. Controls for a blow-out preventer with a pressure rating of greater than 3,000 psi should be located a safe distance from the drilling rig." I ask that BOP controls be required to be accessible **both** on the rig and at a location a safe distance away from the drilling rig.

Thank you very much.

Jeanette MacNeille
42 Erna Court, Second Floor
Millbourne, PA 19082