

From: Maria Fell [mariafell@bcas.org]
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To: EP, RegComments
Subject: Comments Re Marcellus Shale drilling in Pennsylvania.

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Existing Gas Wells

When drilling for gas in Marcellus Shale, existing wells should be subject to the toughest new regulations for casing & cementing wells and be pressure tested and use blow-out preventers. If an existing well does not meet the new standards all drilling operations must cease until the well is remediated, inspected and approved by independent state inspectors. All functioning wells must be inspected regularly – by independent state inspectors and not by the well operators who cannot be trusted to do an impartial analysis of their own operations.

All wells & operations should be taxed on their output and pay mandatory quarterly charges for the quarterly inspections – no exceptions, the operators should also have annual licenses that are dependant on the results of the quarterly inspections. If the well fails two inspections in one year, no further renewal of the license is possible as the well is judged unsafe and the operator not in compliance as it is obvious that they did not remedy the problems with their well when they were given a chance. The inspection program is to be funded by the annual license fee, the inspection fee and the taxes.

No new gas wells should be permitted for 5 or more years until the effects of the new and stringent regulations of gas wells can be evaluated to make sure that there are no negative impacts on the environment, water contamination and possible explosions as we are dealing with now.

We cannot afford to create more havoc & pollution of the environment and watersheds by not adopting stringent standards. If we allow rampant gas well drilling in Pennsylvania we soon will not have any safe water sources in the Marcellus shale areas and these will become economic dead zones as no-one will want to either live or operate their business in such contaminated areas and cleanup will be extremely expensive, these areas will become similar to “superfund sites”

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