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July 22, 2010

Environmental Quality Board
P. O. Box 8477
Harrisburg PA 17105-8477

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ENVIRONMENTAL QUALITY BOARD

RE: Chapter 78 Regulations

I am writing in support of DEP's stronger Chapter 78 Oil and Gas Regulations.

I am recommending that you endorse the following recommendations found in the Harvey Consultants study.

Particularly I am concerned that the well bore should be totally and completely isolated from any and all groundwater and any aquifers through which the well is drilled using only the best practices.

The surface casing should provide support for blowout prevention and contain drilling fluids for subsequent sections.

The intermediate casing should provide an additional protective barrier of pipe and concrete to seal off all possible leakage.

The surface casing and the intermediate casing should be required in all well bores and provide total containment of all drilling fluids.

Revise the cement definition to raise the 72-hour compressive strength to 1200 psi for surface, intermediate and production casings.

Expand the Cement Ticket to include testing of pH and temperature, record Waiting On Cement Time and penalty of law certification that the drilling cement job was completed in compliance with Pennsylvania regulatory requirements.

§78.51 should be restated to require inspection and reporting of investigation requests within 24 hours.

All restored water supplies and replacement water supplies under §78.51 should meet Pennsylvania Safe Drinking Water Standards.

Revise § 78.55 to require well operators to submit a copy of their control and disposal plan for DEP review and approval prior to commencing operations to ensure compliance with Pennsylvania Environmental Protection Standards.

Amend § 78.71(a) to clearly state that sufficient casing and cement must be installed in the well to prevent contamination of all ground water resources, in addition to the other purposes already listed.

Clarify the diverter specifications §78.72 and contain all diverted gases with none escaping into the atmosphere. Require every well to have a specified Blow Out Preventer on the rig once the surface casing is installed and cemented without exception in addition to a Blow Out Preventer a safe distance from the well head. Drilling must cease if the Blow Out Preventer fails a test and may not resume until the Blow Out Preventer has been replaced or repaired and successfully retested.

Pressure limit applies to all well activities under §78.73. Operator will notify DEP of pressure exceedance within 24 hours, submit a written plan for approval and aid DEP to notify potentially affected parties.

DEP should prohibit flaring, venting and all fugitive emissions.

Specify all casing pressure testing at quantifiable 50% of the working pressure of the Blow Out Preventer.

§78.82 should specify that all conductor pipes prevent infiltration of surface water or fluids into groundwater. Drilling fluids should be limited to air, fresh water, or water-based muds and totally exclude oil based muds or other chemical lubricants. Read NO 2BE!

Casings protecting the environment shall not be used for production.

Increase surface casing depth § 78.83 to 100 feet below the deepest fresh water zone and at least 100 feet into bedrock.

Surface casing should be cemented continuously from top to bottom and centered in the bore hole with an equal layer of cement all around and specified in the cement bond log.

Intermediate casing string should be entirely cemented.

Protect groundwater.

The well permit application should contain a complete casing and cementing plan, including casing history and strength.

There should be a 25% excess cement return to ensure complete protection.

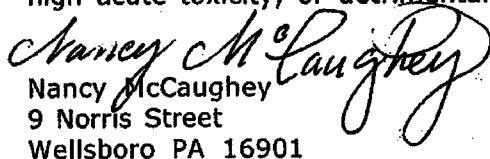
Surface casing should be all new material 20% stronger than anticipated pressure.

Correct Portland Cement specifications and increase strength to 1200 psi.

Increase well inspection frequency to daily or a minimum of weekly.

78.122(a) should require a list of waste generated during drilling and workover operations and a description of the waste handling and disposal methods with their locations.

Revise the regulations at § 78.122(b)(6) to include information on the chemical additives, including all chemical components. Reported information should include biodegradability, bioaccumulation potential, toxicity, and any detrimental mutagenic or reproductive effects. Best practices would include a requirement to forbid chemicals that have low biodegradability, high bioaccumulation potential, high acute toxicity, or detrimental mutagenic or reproductive effects.


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