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ENVIRONMENTAL QUALITY BOARD

Environmental Quality Board
P.O. Box 8477
Harrisburg PA 17105-8477
CH 78 Regulations

Dear Environmental Quality Board,

My wife and I relocated from the Philadelphia area to Sullivan County about three years ago. Our intention was to live out our lives in this relatively unspoiled and clean environment.

As you are fully aware, the natural gas drilling industry has recently ramped up it's operations on the Marcellus shale.

My entire community shares a deep concern with me over the effects of natural gas drilling. We feel as though the entire process is moving too fast and with too little regulation.

We have reviewed the recommendations submitted (to you) by EarthJustice on March 1, 2010 which I applaud and wholly support. Highlights of the recommendations that we are specifically interested in are attached. Please consider these recommendations as you move forward with your policy making.

Thanks from Sullivan County,



Richard Liebert
PO Box 286
300 Mountain View Lane
Eagles Mere, PA 17731



Nancy Liebert

- **Cementing -**

Texas requires an **additional** 72-hour compressive strength standard of at least 1,200 psi across critical zones of cement. For example, Texas regulation defines the critical zone as "all usable-quality water zones," and defines the "critical zone of cement" as the bottom 20% of the casing string (at least 300', but no more than 1000'). This places a section of high strength cement at the bottom of the casing seat where the highest pressures and stresses are likely to be encountered.

Additionally, Texas requires the API free water separation to average no more than six milliliters per 250 milliliters of cement, tested in accordance with the current API RP 10B. The commission may require a better quality of cement mixture to be used in any well or any area if evidence of local conditions indicates a better quality of cement is necessary to prevent pollution or to provide safer conditions in the well or area.

- **Cementing**

DEP's definition for cement sets a 24-hour compressive strength standard of at least **500 psi**; however, other states, such as Texas, have found that standard **insufficient** to prevent vertical migration of fluids or gas behind pipe. Texas requires an **additional** 72-hour compressive strength standard of at least **1,200 psi** across critical zones of cement.

- **Cement Ticket -**

This is a written record that documents the procedures and specifications of the cementing operation and the chemical composition of the cement for each cemented casing string.

Suggestion: Expand 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 (this is standard industry practice and aids in determining cement quality); (b) a record of the Waiting on Cement [WOC] time, which is the time required to achieve the calculated compressive strength standard before the casing is disturbed in any way

- **Protection of Water Supplies -**

DEP has proposed a number of important revisions to the regulations at §78.51 to clarify what constitutes an adequately restored or replacement water supply. However, DEP did not recommend any revisions to §78.51(c) that sets a timeframe for acting upon a complaint filed by a landowner,

water purveyor, or affected person suffering pollution or diminution of a water supply as a result of drilling, altering, or operating an oil or gas well. Suggestion: 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.

- **Blowout Preventer –**

Blowouts are very serious human health, work safety, and environmental situations. Blowouts may result in human injury, fire, explosion, oil spills, gas venting, equipment damage, etc.

Suggestion: Require all wells to be drilled with a Blow-Out Preventer once the surface casing is installed and cemented. No exceptions.

Additional Suggestion: 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."

This regulation requires BOP controls to be accessible during an emergency; this is logical. However, the second sentence of the proposed regulation, which instructs the operator to place the BOP controls at a safe distance away from the drilling rig, does not instruct the operator to have BOP controls on the rig itself. BOP controls need to be accessible **both** on the rig and at a location a safe distance away from the drilling rig.