

From: Deana [dogwoodhouse@comcast.net]
Sent: Thursday, July 29, 2010 6:31 AM
To: EP, RegComments
Cc: Scott Perry; Vance, Senator Pat
Subject: EQB/DEP Marcellus Shale standards proposed

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In light of the upcoming review for implementation of tougher DEP standards regulating Marcellus Shale drilling operations, I submit the following points for support:

1. Water Supply Protections:

a. Current PA Regulations only apply to Public Water Sources. This provides UNEQUAL protection to residents with private wells, while those individuals are the most likely to suffer from contamination.

b. The industry is widely protected through arguments based on the lack of technical applications to determine exact cause of underground contamination.

2. Cementing Standards:

a. When there are examples of tougher standards in our nation, namely Texas, where the industry has a longer track record, it is only logical to apply the knowledge gathered through that experience. Implementation of an additional 72-hour compressive strength standard of at least 1,200 psi across critical zones affords greater protection and should be pursued.

b. Documentation of the chemical composition of cement mixtures is a reasonable standard to afford long-term assessments of impacts. Expand the "cement ticket" definition to include a requirement for operator tests of water ph and temperature, maintain these records at ONE location within the DEP for future reference.

c. Apply the "WOC" Waiting on Cement, required to achieve calculated compressive strength standard prior to casing disturbance. Allowing ANY shortcuts, or waiving any environmental/public protections to accommodate the industry is not serving Pennsylvania's best interests.

3. Blowout Preventer requirements:

ALL wells should be drilled with inclusion of Blowout Preventers, with NO waivers or exceptions allowable.

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