

2857 Letter 2.

Form B

(2)

From: Tate, Michele [mtate@state.pa.us]
Sent: Tuesday, August 03, 2010 2:53 PM
To: 'Richard Fox'; Richard Fox; Edward Yim; IRRRC; Joe Deklinski; Patrick Henderson
Cc: Perry, Scott; Nolan, Elizabeth A; Chambers, Laura M.; Lapato, Daniel; Adams, Duke; Totino, Michaele
Subject: Public Comments Received - Proposed Oil and Gas Well Casing and Cementing Rulemaking
Attachments: Re: 25 Pa. Code Ch. 78; CH 78 Regulations - Marcellus Shale, Oil & gas drilling; CH 78 regulations; Re: 25 Pa. Code Ch. 78; CH 78 Regulations; Chapter 78 Oil & Gas Regulation change comments; Proposed Rulemaking, 25 PA Code Chapter 78 ; Re: 25 Pa. Code Ch. 78; PA DEP's Environmental Quality Board (EQB) Proposed Amendment to the Regulations on Oil and Gas Casing and Cementing, Chapter 78.; Re: 25 Pa. Code Ch. 78; EQB/DEP Marcellus Shale standards proposed; Marcellus Shale Issue; (no subject); New Stronger Regulations; Oil and Gas Regulations; opposing gas and oil drilling; Proposed Regulations on Marcellus Shale Drilling; Re: Proposed Regulations on Marcellus Shale Drilling; Fwd: Share Your Comments on Marcellus Shale Issue; Marcellus shale; proposed rules for Oil and Gas; CH 78 Regulations; CH 78 regulations; CH 78 Regulations; Comments on DEP Chapter 78 Revisions; Ch 78 Regulations; Fw: COMMENTS RE : Marcellus regulations on drilling; FW: CH 78 Regulations

Importance: High

Good Afternoon:

The EQB has received the following comments on the above referenced proposed rulemaking:

1. The following form letter was submitted to the EQB by approximately 876 commentators, to date. Those commentators will be identified individually via separate transmittal in hard copy to IRRRC.
2. The following form letter was submitted to the EQB by two commentators, to date. Those commentators will be identified individually via separate transmittal in hard copy to IRRRC.
3. The following form letter was submitted to the EQB by two commentators, to date. Those commentators will be identified individually via separate transmittal in hard copy to IRRRC.
4. Individual comments received on the proposed rulemaking are as follows:

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2857

From: James Beam [jamesdb123@msn.com]
Sent: Friday, July 30, 2010 10:11 AM
To: EP, RegComments
Subject: CH 78 Regulations - Marcellus Shale, Oil & gas drilling

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Regarding CH 78 Regulations - Oil & Gas Drilling, Marcellus Shale

The scale of expansion in the Marcellus Shale extraction requires increased precautions and regulatory standards. I have been an Controller for businesses for 30 eyars. My experience with business and the profit motive that drives it has shown me that, without strong regulatory standards and oversight, businesses, left unchecked, will always follow the short-sighted most profitable approach regardless of the consequences to anyone else. The tremendous increase in the anticipated volume in the Marcellus Shale drilling in PA will exercebate the detrimental effect on the environment.

Specifically my concerns are:

- Safety

Marcellus depths and pressures are so far beyond what was "normal" in the 1980's, we must upgrade the Oil & Gas regulations to ensure safety.

- Prevent stray gas migration [contaminating local waterwells]

· Cementing – Use Texas standards

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.

· Cementing – Upgrade the details

Ensure better cementing by documenting the chemical composition of the mixture.

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.

Allow no shortcuts.

- Protection of Water Supplies -

DEP must clarify §78.51 to explain what constitutes an adequately restored or replacement water supply for homeowners. There should be a set timeframe for acting upon a complaint filed by a landowner.

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 work safety, and environmental situations. Blowouts may result in human injury, fire, explosion, oil spills and gas venting. Suggestion: Require all wells to be drilled with a Blow-Out Preventer once the surface casing is installed and cemented. No exceptions.

§78.72 (c) requires BOP controls to be accessible during an emergency; this is logical. However, the regulation should also require that the operator to place the 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. Recent accidents show the need for this.

“Safe” = absence of risk. While it is not possible to eliminate all the risks inherent in drilling, we have to ensure that the standards are as bullet-proof as we can make them. There should be no “weasel clauses” that allow misinterpretation, no omissions, no compromises because of industry arm-twisting or whining that DEP is “unfriendly”.

I strongly support for the new DEP CH 78 regulations.

James Beam
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