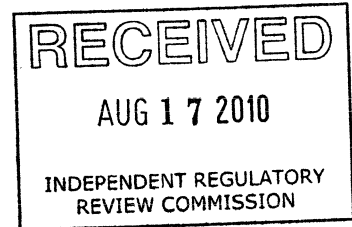


Cooper, Kathy

From: Dracon [dracon@hughes.net]
Sent: Friday, August 06, 2010 3:34 PM
To: EP, RegComments
Subject: Re: PROPOSED RULEMAKING [?25 PA.?CODE CH. 78?]
Attachments: Send DEP PA Proposed Rulemaking.doc

Re: PROPOSED RULEMAKING

ENVIRONMENTAL
 QUALITY BOARD
 [25 PA. CODE CH. 78]



Oil and Gas Wells

The proposed regulations do not address items that would be required to protect a residence from air pollution and noise pollution.

Furthermore, merely strengthening the regulations to conform to “current industry standards” is not guaranteed to provide “an increased degree of protection for both public and private water supplies” since, as put forth in your own document, “many, if not all, Marcellus well operators met or exceeded the current well casing and cementing regulations” and yet there have been numerous cases of well water pollution.

Hydrofracking is a technology that is too dangerous to allow anywhere near areas where people reside and should be banned. Merely trying to regulate it is foolish because, sooner or later, some gas driller will make a mistake or deliberately cut corners, and the result will be a disaster that harms a lot of people.

New York State has just put a moratorium on drilling until May, 2011 while it studies the problem. Why is Pennsylvania so backward? Why is the government of Pennsylvania selling out our environment to well drillers? It seems that the Pennsylvania government has quietly acquiesced to well drilling without even pretending to study the problem.

Air Quality

Returned water from hydrofracking a gas well is kept in large open pools. This water contains many carcinogenic chemicals. Well drillers spray this water to evaporate as much as possible in order to have less water to haul away for treatment. Benzene, toluene, and other fracking chemicals escape into the air. These chemicals cause cancer and other damage to people and wildlife.

Why are you not regulating drillers to limit how much benzene escapes from their operation? Why are you not regulating how close they can be to any residence? Why are you not regulating the diesel fumes that drilling releases – especially by limiting the amount and density of trucking operations which residents near a drilling operation must endure?

Water Pollution

In 2009 Mayor Bloomberg commissioned a study of the possible impact of hydrofracking in the New York City water supply watershed. NYC DEP retained the Joint Venture of Hazen and Sawyer, an environmental engineering firm, and Leggette, Brashears & Graham, a hydrogeologic and environmental consulting firm to

perform the study. According to the study “intensive natural gas well development in the watershed brings an increased level of risk of degrading source water quality, and the risk of exposing watershed residents and potentially NYC residents to chronic low levels of toxic chemicals. Extensive hydraulic fracturing of horizontal wells will present subsurface contamination risks via naturally occurring faults and fractures, and potential alteration of deep groundwater flow regimes.”

The conclusion was that the risk to the City’s water supply was too great to allow gas drilling operations anywhere near the watershed. Is it the decision of the Pennsylvania government that, while New York City protects its water supply, Pennsylvania will allow its citizens to have their water polluted on an individual basis, one by one, as unrestrained gas drilling goes on across the state?

Natural gas is not clean energy

Contrary to statements made by proponents of natural gas drilling, natural gas is not clean energy. While burning natural gas produces less solid particulates than oil or coal, it produces an identical amount of CO₂ per calories generated so that, e.g., producing 1 megawatt-hour of electricity using natural gas creates the same amount of climate-changing CO₂ as any other fossil fuel. Furthermore, one of the reasons that NG has fewer amounts and lower levels of pollutants other than CO₂ is because many of these pollutants (like sulfur) are removed prior to introducing the well gas to the distribution system, and these pollutants are customarily vented to the atmosphere anyway. NG is a fossil fuel – not a clean, renewable energy source – and its use in no way ameliorates the United States’ energy difficulties. Nor does its use help stave off climate change.

Paradoxically, a plentiful, cheap supply of natural gas is, in the long run, the worst thing that could happen to the energy economy of the United States, because, by keeping a fossil fuel source of energy inexpensive, it removes the economic incentive to develop other sources of energy which are truly clean and renewable – like wind and solar.

In addition, keeping energy cheap encourages waste. Energy pricing should reflect the environmental cost of supplying that energy. The environmental cost of natural gas is very high. If hydrofracking is banned, the increase in energy costs will drive down energy consumption thereby producing less climate-changing CO₂.

Conclusions

1. If any regulations are now put in place, they should be the most stringent possible in order to protect residents of Pennsylvania from **any** environmental impact – regulations that would just about discourage well drilling.
2. Better yet: Pennsylvania should put a moratorium on well drilling while it studies the problem. Any honest study will clearly demonstrate that the hydrofracking technology is inherently too flawed and dangerous to allow to continue.
3. Best: Pennsylvania should take its clue from the recommendations of the 2009 NYC DEP study and simply ban hydrofracking for good.

Submitted by:

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QUALITY BOARD**

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