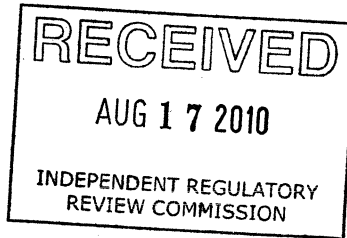


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August 9, 2010

Via email: RegComments@state.pa.us

Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

Subject: Comments on Proposed Rulemaking, [25 PA CODE CH. 78], Oil and Gas Wells, [40 Pa.B. 3845] [Saturday, July 10, 2010]

Dear Environmental Quality Board:

On behalf of EQT Corporation ("EQT"), I am filing the following comments. EQT appreciates the opportunity to provide feedback regarding the Environmental Quality Board's proposed rulemaking for 25 PA Code Ch. 78, Oil and Gas Wells, [40 Pa.B. 3845] as published in the Saturday, July 10, 2010 PA Bulletin.

EQT is Appalachia's largest exploration and production company, developing and implementing advanced drilling technology to tap into unconventional reservoirs such as shale, tight sands and coalbed methane. EQT understands the Department's efforts to protect water supplies and minimize any concerns associated with gas migration. EQT submits the following comments of the proposed rulemaking:

First, existing rules and experience dictate that a fifth alternative to address situations in which cement is not circulated to the surface during the drilling of a wells should be added to proposed §78.83b. §78.83(j) already provides that "If it is anticipated that cement used to permanently cement the surface casing cannot be circulated to the surface, a cement basket may be installed immediately above the depth of the last anticipated lost circulation zone". The existing regulation further provides that "[T]he casing should be permanently cemented by the displacement method. Additional cement may be added above the cement basket, if necessary, by pumping through a pour string from the surface to fill the annular space."

The method described in §78.83(i) is the most effective method of filling voids in the event that cement is not permanently circulated to the surface. The four alternative methods in proposed

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§78.83a will not as effectively address a situation where there is an issue with cementing at a location somewhere other than the shoe. That situation can only be addressed by running baskets and cementing down the backside or venting as contemplated by §78.83(i).

Secondly, §78.85 should be modified because waiting on cement for eight hours is not always necessary to obtain minimum required compressive strengths and assume that gas migration will not occur. Using minimum compressive strength as the standard for determining the efficiency of a cement job is the most effective and efficient method of insuring that gas migration does not occur.

EQT appreciates this opportunity to address the best standards for preventing gas migration. We look forward to continuing to work with DEP to develop standards for the safe drilling and operation of natural gas wells in the Commonwealth of Pennsylvania.

Again, EQT appreciates the opportunity to provide comments on the proposed modifications to Chapter 78. Thank you for your consideration.

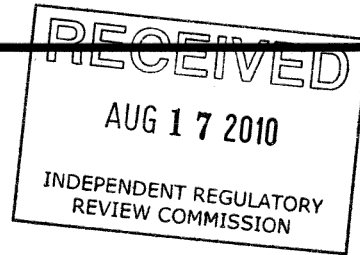
Very truly yours,

A handwritten signature in black ink, appearing to read "Michael T. Killion", written in a cursive style.

Michael T. Killion

MTK/jfl

From: Michael Wood [mwood@pennbpc.org]
Sent: Monday, August 09, 2010 5:12 PM
To: EP, RegComments
Subject: CH 78 Regulations



Dear Environmental Quality Board,

The changes proposed for amending Chapter 78 are a significant step in the right direction. The extraction of natural gas from the Marcellus Shale is already bringing new techniques and technology to Pennsylvania and well regulation needs to keep up. The changes proposed by the Environmental Quality Board are both welcomed and needed.

I offer a couple of specific comments that may help make these regulations stronger.

§78.1 defines "cement" as having a 24-hour compressive strength of at least 500 psi in accordance with applicable standards and specification. Texas has required a much stronger standard (1,200 psi over a 72-hour period) for critical zones. Pennsylvania would be wise to learn from Texas' experience with shale wells and their unique requirements.

Blowout preventers should be required for every well once the surface casing has been installed. Controls for the blowout preventer should be on the drilling rig and a secondary location, in case the rig is inaccessible during an event.

Thank you for proposing these changes that would make Pennsylvania safer.

Respectfully submitted,

Michael Wood
Research Director
Pennsylvania Budget and Policy Center
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Harrisburg, PA 17101
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mwood@pennbpc.org

2857

From: Killion, Michael T. [michael.killion@bipc.com]
Sent: Monday, August 09, 2010 4:14 PM
To: EP, RegComments
Subject: Ch 78 Oil and Gas Wells - EQT comments on Proposed Regulations
Attachments: eqt comments.pdf

Attached please find EQT Corporation's comments on the proposed Chapter 78 regulations.

Buchanan Ingersoll & Rooney PC

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