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Cooper, Kathy

From: Janet Fishman [janetfishman@hotmail.com]
Sent: Thursday, August 05, 2010 1:38 PM
To: EP, RegComments
Subject: CH 78 Regulations



To whom it may concern:

I, Janet Michele Fishman, am a Pennsylvania resident living at 638 S. 51st St., Philadelphia, PA, 19143. The DEP has proposed tougher standards for oil and gas drilling operations.

I support even tougher regulations.

My concerns include:

1. Safety: Marcellus depths and pressures are so far beyond what was "normal" in the 1980s. We must upgrade the oil and gas regulations to ensure safety. To prevent contaminating local water wells, we need to use Texas standards for cementing. The 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. Texas requires an additional 72 hour compressive strength standard of at least 1,200 psi across critical zones of cement.

We also need to 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 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.

2. Protection of Water Supplies:

DEP must clarify 78.51 to explain what constitutes and adequately restored or replacement water supply for homeowners. There should be a set time for acting on a complaint filed by a landowner. Revise 78.51 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 the operation.

3. Blowout prevention:

Blowouts are very serious work safety and environmental situations. Blowouts may result in human injury or death, fire, explosion, oil spills and gas venting. Require all wells to be drilled with a blow-out preventer once the surface casing is installed and cemented. NO EXCEPTIONS!

78.72 requires BOP controls to be accessible during an emergency. This is logical. However the regulation should also require that the operator place the BOP controls on the rig itself. BOP controls need to be accessible both on the rig and at the location at a safe distance away from the drilling rig. Recent shortcuts show the need for this.

Safe means absence of risk. While it is not possible to eliminate all the risks inherent in drilling, we need to insure that the standards are as bullet proof as we can make them. There should be no "weasel clauses" that allow for misinterpretation and no omissions, compromises, or chances for industry arm-twisting of the DEP.

Thank you for hearing my concerns. This environmental issue is at the top of my list, and affects how I vote.

Sincerely,

Janet M. Fishman
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