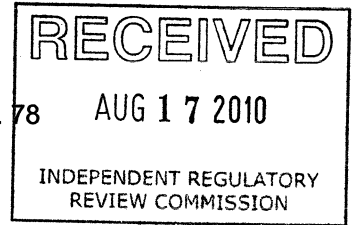


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Cooper, Kathy

From: Robson, Lance E. [lrobson@robsonforensic.com]
Sent: Thursday, August 05, 2010 3:10 PM
Cc: EP, RegComments
Subject: Comments on Recommendations for Revisions of 25 Pa. Code Ch. 78



Gentlemen:

Thank you for revisiting the provisions of this section of the Pa Code, regarding casing of oil and gas wells in Pennsylvania.

Protection of water supplies relies on "cementing" annular spaces created by the drilling and casing. I don't see any provisions to verify that the cementing has sealed the annular spaces and ensure that there is not an interconnected system of voids that can defeat the purpose of the cementing.

I obtained and reviewed part of the Harvey Consulting report, with its recommendations. This report appears to be written by a knowledgeable and experienced engineer and properly directed towards measures that will protect water supplies. I am sure that DEP will take the report seriously and am grateful that DEP's initiative has lead to the review and production of such a report.

Thank you, Lance E. Robson, P.E.
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