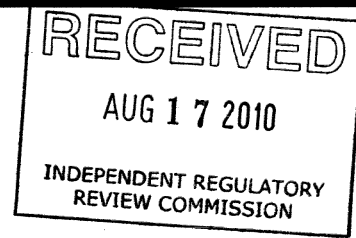


2857

From: Ralph Kisberg [rkisberg@gmail.com]
Sent: Monday, August 09, 2010 10:26 PM
To: EP, RegComments
Subject: Ch. 78 Regulations



Dear Environmental Quality Board Members:

Below please find written comments on the Environmental Quality Board's proposed amendments of 25 Pa. Code Ch. 78 (Oil & Gas Wells). Thank you for the opportunity to participate in the rulemaking process.

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(I gave an oral testimony at hearings held at Lycoming College in lte July but did not have a written copy at the time).

As a non expert in these very technical matters, but I heartily endorse that you adopt the Harvey report recommendations. With the wealth of the Marcellus formation and the wealth of water resources our commonwealth possesses, gas development companies can certainly afford, and we the people of Pennsylvania can ill afford not, to have the highest and best standards in the country for the protection of or citizens and the environment upon which we rely for our existence.

Your proposed regulations do not go nearly far enough. I suspect much of what is on the table comes from the usual industry/regulator collaborative coziness that must and will come to an end.

Here is one small example as to why the Harvey standards need to be heeded: I spoke with a young Texan of my acquaintance a few weeks ago who operates gyroscopic surveys for well bore directional confirmation and, 6 hours after cement is finished being poured for well casing, to take temperature readings every 100 feet down the bore hole where cementing takes place. His exact quote is that." It is not uncommon to find a low reading, which indicates that water has washed out the cement.." Could this be part of the reason why we have so much reported and unreported (non disclosure agreement solutions) methane migration? What else may be migrating or eventually migratin?. Can we at least do as well as Texas in requiring temp readings to confirm the thickness of pours, readings done by an independent entity and not volume logs compiled by gas industry employees.

Thank you,

Ralph Kisberg