

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Monday, January 13, 2014 3:44 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRIC;
RegComments@pa.gov; eregop@pahousegop.com;
environmentalcommittee@pahouse.net
Cc: ra-epmsdevelopment@pa.gov
Subject: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

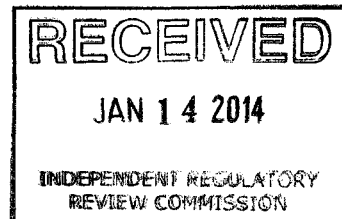


Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

The Environmental Quality Board (EQB) has received the following comments regarding the above-referenced proposed rulemaking.

Commentor Information:

Paul W. Heibel
Potter County Board of Commissioners (pheimel@pottercountypa.net)
Anonymous
Anonymous, PA 00000 US



Comments entered:

Greetings.

Please find pasted below, and also attached as a Word document, a letter of public comment from the Potter County (Pa.) Board of Commissioners regarding the 25 Pa. Code Chapter 78 related to oil and gas wells. Please acknowledge receipt of this correspondence. We appreciate the opportunity to be heard on this issue.

Yours truly,

Paul W. Heibel
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PUBLIC COMMENTS/PROPOSED OIL & GAS REGULATIONS

Jan. 13, 2014

Pennsylvania Environmental Quality Board

Dear EQB Members:

We are writing in support of the 10 public water systems in Potter County and many others in northern and central Pennsylvania who are calling on the Pennsylvania Department of Environmental Protection to include the location of delineated water supply recharge areas in its gas/oil permit review process, and to require that public drinking water system operators be notified when a permit is issued in close proximity to these sensitive areas. This requirement would assure that municipal water authorities are informed of pending drilling activity, while opening a line of communication between the drillers, DEP's Oil and Gas and Safe Drinking Water Programs, and the municipal water authorities.

We appreciate DEP's support of our local public water system operators' development of Source Water Protection Plans. It naturally follows that these facilities and the recharge areas that feed their sources should be afforded priority protection in DEP's consideration of applications for energy development and other permitted activities and should be incorporated into the e-Facts system, as they are mapped in electronic format.

One of the common misconceptions sometimes voiced during discussions on this issue is the assumption that it was adequately addressed in Pennsylvania Act 13 of 2012. Indeed, Act 13 increased the regulatory notification distance for drilling activities in close proximity to a Source Water Protection Zone from 1,000 feet to a new standard of 3,000 feet. However, in many cases – especially for the water systems with high-capacity water supply wells – the Zone II wellhead protection area (as defined in 25 Pa. Code Chapter 109) is larger than the 3,000-foot limit. The complicated geology of Pennsylvania requires that a standard be based on each water supply source's individual characteristics, rather than a blanket generalized distance.

Potter County's interest in this and related issues goes back to the early stages of shale gas exploration and development in Pennsylvania. Given our unique location as a headwaters region for three of the major river systems in the East, local leaders formed three organizations – the Natural Gas Task Force, the Water Quality Work Group and the Triple Divide Watershed Coalition (not to be confused with a documentary or a hiking trail system using the same 'Triple Divide' moniker).

The Task Force was dedicated to responsible public education on gas drilling and related issues and facilitation of respectful dialogue between all affected parties. It has since evolved to the Natural Gas Resource Center, dedicated to those same objectives while serving as a clearinghouse and information/referral service.

The Work Group brings together a broad cross-section of individuals directly or indirectly involved in water conservation and related topics.

The Triple Divide Watershed Coalition (TWDC), which was presented with a Governor's Award for Local Government Excellence in 2012, was formed by all of the county's public water suppliers. Each system now has a DEP-approved Source Water Protection Plan that includes mapping of the recharge areas, baseline data, identification of potential risks, and a plan to prevent contamination. TDWC has also brought greater efficiencies in operator training, networking opportunities and cost-saving bulk purchasing options for materials and equipment.

Another important component of the Triple Divide Watershed Coalition is public education and effective advocacy for government policies affecting public drinking water supplies. It is in the latter capacity that the Potter County Board of Commissioners is strongly supporting TDWC's request to include the location of delineated water supply recharge areas in DEP's gas/oil permit review process, and to require that public drinking water system operators be notified when a

permit is issued in close proximity to these sensitive areas. We would appreciate your support.

Yours truly,

POTTER COUNTY BOARD OF COMMISSIONERS

Douglas C. Morley, Chairman
Paul W. Heimel, Vice Chairman
Susan S. Kefover, Secretary

These links provide access to the attachments provided as part of this comment. You are advised to save the attachments to your local computer or a network share when prompted by your browser.

Comments Attachment: [EQBLetter - Potter County.doc](#)

Please contact me if you have any questions.

Sincerely,
Hayley Book

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