



"Connection for Oil, Gas & Environment in the Northern Tier, Inc."
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November 14, 2014

Michele Tate, Executive Director
PA DEP – Citizens Advisory Council
Rachel Carson State Office Building
400 Market Street
Harrisburg PA 17101
mtate@pa.gov

RE: November 18th CAC Meeting, Recommendations to Governor-Elect Tom Wolf

Dear Director Tate and members of the Citizens Advisory Council:

It is our understanding that the November 18th CAC meeting will in part include a discussion of recommendations for Governor-Elect Tom Wolf for improving the DEP's operations and programs. Since we are unable to attend this meeting due to a scheduling conflict, we are thus submitting our comments on this topic that we would provide during the public comment segment of the agenda had we been able to attend.

Connection for Oil, Gas and Environment in the Northern Tier, Inc., focuses on the five county region of Bradford, Sullivan, Susquehanna, Tioga and Wyoming Counties. C.O.G.E.N.T. is a resource for landowners and communities alike striving to find and advocate for a balance that supports public health and safety, community and the environment balanced with the needs of industry. There are approximately 183,000 souls in the five county 3,987 square mile region, a region that hosts more than 40% of the unconventional natural gas wells and related infrastructure. Within our region there are well pads and facilities located near our homes, schools and even our hospitals. We have participated in numerous public comment periods relative to the oil & gas and air quality programs, including submitting extensive comments on the Chapter 78 revisions. We also were invited and participated in the TAB subcommittees on the Chapter 78 revisions. Thus, as we focus primarily on the oil & gas and air quality programs, we make our suggestions to the Council for consideration as discussion begins on recommendations for Governor-Elect Tom Wolf.

Suggestions:

1. The Rulemaking: Environmental Protection Performance Standards at Oil & Gas Well Sites – our Region has been particularly interested in this rulemaking and many citizens took the time to read the entire rulemaking and submit comment. Since there is not much time remaining on the calendar for this rulemaking, we strongly suggest the rulemaking move forward without further delay as these regulations have a direct affect on the daily operations near our homes, schools and hospitals.
2. We suggest due diligence regarding staffing changes. The oil and gas program is very dynamic, despite having to operate within constraints. From executive level to field staff, we have interacted with very dedicated and hard-working employees. Rather

than proceed with staffing changes, we suggest that considerations be made to eliminating constraints, which will thereby allow the program and its conscientious staff to flourish benefiting those who live within the development, very close to well pads and facilities along with those who recreate in the gas fields, balanced with the needs of industry. Eliminating constraints and expanding staffing are preferred to any staffing changes and more than likely will yield better results.

3. We suggest more emphasis be given to regional air quality. While statewide the air quality has been improving our Region has had the opposite experience with greater air emissions and increasing prevalence of school age asthma (statistics maintained by the DOH). This includes the placement of more monitors and appropriate air studies.
4. Should the Long Term Marcellus Air Monitoring Study not be published by year-end, we suggest emphasis be placed on completing the report as soon as possible in order that changes that may be appropriate with permitting, monitoring and enforcement may occur.
5. Finally, we suggest the formation of a stakeholder work group to study and provide recommendations on gaps that remain to be addressed: public health and safety issues including appropriate studies, such as lacking information regarding scientifically based safe setbacks for well pads and facilities, as relating to air quality and noise issues most especially; air quality monitoring and including air toxics studies; and while not a DEP issue still, this remains a serious gap, regulating Class 1 area gathering lines and independent study on non-regulated alternative construction methods and the non-regulated use of composite pipe within the Class 1 area locations. Should a stakeholder work group be formed, we desire to be part of that group.

We've noted above in part, gaps that remain to be filled, gaps that necessitate scientific data over the arbitrary information that is currently the basis for some of these issues, if that even exists. These issues directly affect the daily public health and safety of folks that live within the development areas not to mention the inherent affect on quality of life. There are many aspects pertaining to successful unconventional oil & gas resource development within the Commonwealth which are important. Placing more emphasis on a severance tax lacking attention to these details will not create a success story.

We regret we are unable to be in attendance at the November 18th meeting. We thank you for your consideration of our suggestions despite our absence from the meeting. Please include our comment with the minutes of this meeting. Thank you for your consideration.

Best Regards,



Emily E. Krafjack
President