September 26, 2013

Environmental Quality Board
PO Box 8477
Harrisburg PA 17101-2301
RegComments@pa.gov

RE: Oil and Gas Well Fee Amendments – Comment Summary

Please be advised we support the proposed rulemaking in its entirety as written for adoption. Our reasons are outlined as below noted.

- C.O.G.E.N.T. focus area includes Bradford, Sullivan, Susquehanna, Tioga and Wyoming Counties. Three of our counties are in the top five, Bradford (1), Tioga (3), Susquehanna (4) for drilled unconventional wells.
- All five counties are in the top ten for counties having unconventional gas well violations, Bradford (1), Susquehanna (2), Tioga (4), Wyoming (7) and Sullivan (8).
- Unconventional gas wells are located near homes, schools and within and around our rural, farmland and forested communities.
- We want to see an efficient, modernized, robust program with adequate staffing levels to ensure our Marcellus Shale region is adequately protected for public health and safety, the environment and communities at large.
- The new fee structure and increase is reasonable and provides industry with predictability and consistency.
- The fee increase provides for streamline review benefiting industry with more electronic IT options. This extends to benefiting DEP through database and other much needed improvements, such as greater field and clerical staff efficiencies. Benefits also extend to the public with right to know requests and other information hopefully available online.
- Act 9 and Act 13 requirements provide for prompt field staff response, this is extremely important to those of us living within the gas fields, with protection of water supplies and during emergency events.
- The industry continues to need encouragement to operate more safely near our homes and schools, the best way to encourage we have found is through reasonable regulations. We need the Bureau of Oil & Gas Planning and Program Management adequately staffed to initiate reasonable regulations, policies and technical guidance documents.

Best Regards,

Emily E. Krafjack
President