

**Krivos, Heather**

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**From:** Ryan Davis <rdavis@merrion.bz>  
**Sent:** Monday, March 11, 2019 5:00 PM  
**To:** Donohue, Thomas E  
**Cc:** Philana Thompson; Krivos, Heather  
**Subject:** [External] Re: ET-Braddock #1H Application Objections  
**Attachments:** 2019-03-11 DEP Impact Response-Final.pdf

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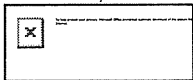
Tom,

I have attached Merrion's response to the objections received by the DEP in regards to our ET-Braddock 1H Well Permit Application. If you have any questions or if you need anything else please let me know.

Thanks,

**Ryan Davis**

*Operations Manager*



(W) 505-215-3292

On Thu, Feb 28, 2019 at 10:24 AM Donohue, Thomas E <[tdonohue@pa.gov](mailto:tdonohue@pa.gov)> wrote:

Philana and Ryan,

We have received letters/postcards from 22 people regarding your proposed ET-Braddock #1H Well Permit Application, which I attached to this email. The concerns cover a variety of topics, including water quality, truck traffic, air pollution, lack of community involvement, noise, light, spills, wildlife, earthquakes, chemicals, waste disposal, and people who just don't want it. Most of these topics are not covered by the well permitting process, however, since there are so many people who voiced their concerns, we feel that it is best to provide some sort of response.

Would you be able to provide us a response to these concerns, and when it comes to light, noise and truck traffic, let us know what you are going to do to minimize these impacts. Light, noise and truck

traffic could potentially be a public nuisance, and we have an obligation to address things that may have the potential to become a public nuisance.

Please let me know if you are able to get us a response by sometime next week. Your response will be included as part of the well permit application file.

Thanks

**Thomas E. Donohue, P.G.** | *Professional Geologist Manager*  
*Department of Environmental Protection | Office of Oil & Gas Management*  
*Southwest District Office*

*400 Waterfront Dr. | Pittsburgh, PA 15222*  
*Phone: 412.442.4004 | Fax: 412.442.4328*  
[www.depweb.state.pa.us](http://www.depweb.state.pa.us)

## ET-Braddock 1H Impact Mitigation Efforts:

### Noise:

Merrion will take all necessary steps to reduce the noise associated with ET-Braddock Project. Merrion has conducted a 72-hour ambient noise level study for the area and will utilize sound abatement equipment as necessary to keep the level of noise below the noise level requirements set forth by East Pittsburgh Borough Zoning Ordinance.

- Drilling Activity
  - **7:00 am to 9:00 pm:** Less than 10 decibels above the average ambient level
  - **9:00 pm to 7:00 am:** Less than 7 decibels above the average ambient level
- Completion Operations (Hydraulic Fracturing)
  - Less than 10 decibels above the average ambient level
- Ongoing Operations
  - Drilling and completion operations are temporary. The ongoing operations will have noise levels lower than the ambient noise level

Additionally, all other planned routine maintenance activities on the site will be conducted between 7:00 am and 9:00 pm to minimize the impact of noise.

### Light:

The site will have permanent security lighting for the safety of our personnel during the ongoing production operations. The site will have temporary lighting for the continuous operation phases of the project (Drilling and Completions) for the safety of the workers onsite. Lighting at the site will be directed downward and inward toward the activity, to the extent possible, to minimize the impact of light on the adjacent properties and roadway.

### Traffic:

Merrion is committed to minimizing the traffic impacts associated with the ET-Braddock Project. Merrion is sourcing water onsite for the completion operations on each well. This will eliminate a considerable number of trucks on the road. Merrion also intends to utilize rail whenever practical to move material into the site such as drilling mud and hydraulic fracturing sand. Merrion will coordinate equipment moves during non-peak traffic periods to minimize the impact to commuters or residents in the area.

#### *Waste Handling and Disposal:*

*The waste generated by the drilling, completion and production of the ET-Braddock 1H will be disposed of properly with the use of state-approved transporters and state-approved disposal sites. The waste generated at the site will be solids from drilling and liquid waste (brine water) from flowback and production. The waste generated will be properly stored on location. The produced water will be stored in steel tanks with secondary containment. The produced water will be trucked offsite to a facility that will filter and clean the water to a point that it can be reused for future hydraulic fracturing operations. The drill cuttings will be stabilized (inert material added to solidify) and transported to a state approved landfill.*

#### *Air Quality:*

*The ET-Braddock Project is being permitted through the Allegheny County Health Department. Merrion is designing the production facilities to minimize emissions from the site and to be in full compliance with the rules and regulations of the Allegheny County Health Department, Article XXI. In an effort to further minimize the air quality impacts the facilities onsite are being designed to utilize instrument air in lieu of natural gas for process control, minimizing VOC emissions. The gas drying equipment emissions will be rerouted to the fuel system to be consumed for process heat. Electric circulation pumps will be used in place of gas driven pneumatic pumps to further reduce gas drying equipment VOC emissions. By sourcing water onsite, Merrion is limiting the numbers of trucks required for the project and thus reducing the diesel emissions from trucks associated with the project. It is expected that all other trucks required for the project will be in compliance with applicable mobile source requirements. Merrion plans to utilize the best available technology and apply best practices to minimize the emissions for the project.*

#### *Water Contamination:*

*To minimize the potential for contamination of water from the surface activities conducted, the site will have a liner laid down prior to the drilling rig moving onsite. All oil based fluid will have secondary containment placed on top of the pad liner. The site is being permitted through the Pennsylvania Department of Environmental Protection for storm water management and erosion and sediment control. The erosion and sedimentation control plan is designed using best management practices (BMPs) in the Pennsylvania Erosion & Sedimentation Pollution Control Manual, Technical Guidance #363-2134-0008. The Post Construction Stormwater Management Plan (PCSM) will satisfy the Allegheny County Act 167 Plan or the standard design criteria of 25 Pa. Code 102.8(g)(2) and (3). Supporting information can be found in the application materials submitted to the Department. Subsurface activities will have safeguards in place to protect the fresh water resource, as well. All fresh ground water resources will be drilled through with a water-based system or air (just like domestic water wells are drilled). Once we have drilled through the fresh water-bearing strata, we will run steel casing and cement it in place before drilling ahead. There will be 2-3 casing strings with cement sheaths protecting the fresh water aquifers before we complete (Hydraulically Fracture) the wells.*



*The well pad and pipeline alignment was selected by the applicant, the land owner, engineers and biologists to maintain functionality at the existing site and to minimize impacts to natural resources. The site was laid out to minimize disturbance, located to minimize impacts to streams/wetlands, and the pipeline corridor will be reclaimed to existing conditions. Other measures to minimize impacts to the environment are detailed in the anti-degradation analysis, erosion and sedimentation control plan and post construction stormwater management/site restoration plan contained in the permit application.*