



Responsible Drilling Alliance

***P.O. Box 502
Williamsport PA 17703-0502***

December 7, 2016

Submitted Electronically via eComment
Mr. Seth Pelepko
Department of Environmental Protection, Policy Office
Rachel Carson Office Building
P. O. Box 2063
Harrisburg, PA 17105-2063

**RE: Guidelines for Implementing Area of Review
Regulatory Requirement for Unconventional Wells,
Document Number: 800.0810-002**

Dear Mr. Pelepko,

The Responsible Drilling Alliance (hereafter referred to as RDA), a 501(c)(3) education and advocacy coalition based in the region above the confluence of the west and north branches of the Susquehanna River, appreciates the opportunity to submit the following comments on guidelines for implementing area of review regulatory requirement for unconventional wells.

As there were at least two communication incidents with orphan or abandoned wells from hydraulic fracturing activities in our region during the most active years of shale gas development, incidents that have cost families peace of mind, royalty income and likely property value, RDA supports the department's guidelines for increasing protection of public health, public safety and the environment. If anything, we would like to see the guidelines be more stringent than what is proposed, certainly not less.

We appreciate the process that has brought about the guidelines and stand in favor of them. As is often the case, we are concerned about the pushback from the oil and gas industry regarding these guidelines.

Given what happened with both incidents in our region, we are also concerned about future administrative discretion in the handling of communication regarding such incidents.

RDA was involved in initial public disclosure of both of the Union Township incident in Tioga County and the incident in Forks Township in Sullivan County. When RDA became aware of both incidents, we immediately requested information from Mr. Spadoni of the North Central Regional Office, passed on the information to our news organization contacts, posted videos on Facebook and did our own reporting in our e-newsletter.

Four years have now passed and we have yet to hear of or see any determinations from the Department regarding either incident, nor come across anything from any media source regarding consequences for the operators issued by the DEP.

It has been approximately two years since RDA completed a file review of well pads in the areas of the incidents, but there were no references to be found in the files when we did review them.

From attending a TAB meeting a couple of years ago where area of review issues were discussed, it seemed as though Shell had learned some expensive lessons from the Union Township incident. Did other operators?

Many questions remain unanswered:

- Have landowners with leased acreage who have gone from the anticipation of potential royalties to fear of contamination of their drinking water supplies, explosive levels of methane in their homes and their ability to ever sell their properties, ever been fairly compensated?
- Has the Commonwealth been compensated for the time and expense that went into monitoring and investigating the incident as well as the environmental damage done at the very least from the flaring of so many wells on pads around the incident area?
- Has a calculation been made as to how much gas was burned off and wasted by Shell's actions?
- Has the proof of communication between wells drilled from different pads (demonstrated by the need for all the flaring) been studied and analyzed?
- Has or will the operator be fined over the incident?

Finally, in the Forks Township incident, locals claimed that Chesapeake was informed about the existence of the Broschart well prior to drilling in the area. Has this been investigated? Has there ever been any penalty assessed to the operator? The abandoned well was moved to the top of the well plugging fund list and plugged at a cost of what we were told was \$100,000. Shouldn't the operator at least pick up that expense since using it to clean up Chesapeake's mistake means another well or wells somewhere in the Commonwealth that would have been plugged with those funds remain hazardous?

Thank you for the opportunity to submit these comments.

Responsible Drilling Alliance

Ralph Kisberg, consultant

Board of Directors:

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