



December 6, 2016

Submitted Electronically via eComment

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

RE: Interim Final Technical Guidance Document 800-0810-001, Guidelines for Implementing Area of Review Regulatory Requirement for Unconventional Wells

Dear Mr. Pelepko:

Seneca Resources Corporation ("Seneca") hereby files this letter in support of the comments submitted by the Marcellus Shale Coalition ("MSC") regarding the above-referenced interim final technical guidance document. Seneca respectfully requests that the Department incorporate the recommended changes into its guidance document. Seneca further recommends that the Department evaluate whether changes are necessary due to the preliminary injunction imposed by the PA Commonwealth Court regarding sections 78a.52a and 78a.73(c) and (d).

By submitting this comment letter and supporting the comments of the MSC, Seneca is not waiving any of its legal rights to oppose the Department's interpretations of and enforcement of the regulations in question. The guideline will set forth the Department's provisional intentions for the future but will lack the force of law of a properly adopted regulation and will not establish a binding norm.

Thank you for allowing an opportunity for public comment on the draft guidance document.

Best regards,

A handwritten signature in blue ink that reads "Christopher M. Trejchel".

Christopher M. Trejchel
Assistant General Counsel