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Technical Guidance Coordinator
Department of Environmental Protection
Policy Office
Rachel Carson State Office Building
POB 2063
Harrisburg PA 17105-2063

Re: 800-0810-001 Guidelines for Implementing Area of Review (AOR) Regulatory Requirement for Unconventional Wells

Dear Sir/Madam:

The technical guidance document for area of review is perhaps one that would be more aptly commented on by those with experience in the field. However, I've seen first-hand that such individuals represent the industry's interest rather than solid environment protection.

I had the privilege to participate in the 2013 subcommittee meetings on this matter along with numerous TAB meetings where this was a point of discussion. Being a non-engineer needless to say I learned a lot through those discussions. I think perhaps the most poignant and perhaps critical item I learned was that a certain operator, namely Shell had an exquisite experience in Tioga County and learned first-hand the time, money and resource waste that can occur when an unintended communication occurs. They also gained experience in what harm is caused to the environment and what needs to be done to rectify it. Shell pretty much stood alone, or stood out from the many operators that were not only seated at the table but also present in the room. They were very serious about this issue to the point that it was stated that Shell, if they knew there was an old well anywhere in the area, they would forgo drilling their proposed well. Pretty impressive.

Unfortunately, the many other operators in the room would rather take a gamble with our environment and public health and safety. They'd prefer to roll the dice and drill. And, throw precautions to the wind, they will argue until the end of time their lame

excuses for not plugging any orphan or abandoned well in the area that might result in a communication. I've really got to hand it to this industry as a whole. They had many opportunities to work with the department to share maps and other information where they may know where some of these old wells may be contained in their leasehold. But, no, they won't share them for the fear that they'd have to plug them in advance of drilling a well where they may communicate with them. They simply would rather roll the dice and see if they get caught and deal with it then. Shame on an industry who hustled into my community and said they'd do it right.

In January 2012, I received a call from folks across the hollow from where I reside. They were very concerned about the water trucks lined up at Chesapeake Energy's Wootten well pad on the other side of the hollow. They were preparing to fracture the Wootten well. You see, the caller's father and uncle had assisted a well driller back in the early 1950s and they had drilled a few wells in that area. They had read about what happens when unconventional wells communicate with old wells. These wells like hundreds of thousands of others have been orphaned and abandoned. We had documentation of the existence of these wells.

So, it was late afternoon, but I still attempted to contact Chesapeake. I had some business cards and started phoning and leaving messages with every number I had. I also contacted the department. Chesapeake returned my call an hour or two later. I explained the concern. They were unaware of these wells. Despite my informing him that my contact knew where they were, he wanted proof before they'd make any decision. Fortunately, this family had kept a scrapbook of the old drilling in the area. So I was able to email Chesapeake copies and pictures from news articles. Now I had their attention so they agreed to meet with us at 8:00 a.m. the following morning. They were delaying their fracturing job. I sent the department an email asking they'd have someone on site.

As I was walking out my door the next morning, the phone rang and it was the department's oil and gas inspector. She wanted me to know she was on her way, but it was going to take her 30-45 minutes to arrive. So, I knew I had to delay Chesapeake until her arrival.

My contact and I arrived promptly at the Wootten well pad and met with the site superintendent (a subcontractor), Chesapeake's staff I spoke with the previous evening and his student intern. So, we proceeded to have a conversation, as I was really trying to wait for the department's inspector. Finally, the operator felt we'd wasted enough time and needed to see where these wells were. I said well true, but we can't go to the location yet. We need to wait for the DEP inspector I advised them. The looks on their

faces were priceless. You notified the DEP they asked. I said indeed I did and DEP will also accompany us to take a look at this situation. They weren't very happy. I was extremely glad that department's inspector was on the way. I was certain at that point they weren't taking this seriously, or expected they could pull something over on us.

We went to the location to find one open pipe extending about 3 feet out of the ground. We weren't able to find the other well which all figured at that point to have been plugged. The operator and DEP took a good look at the open well. The extended pipe had a rock on top. Then the site superintendent consulted their phone app and said this well wasn't a potential problem. The department's inspector wanted more information. So it was agreed that the fracturing would be delayed until they consulted with Oklahoma or Athens and they would then call the department's inspector and myself prior to commencing fracturing.

The next morning I received a call from the department's inspector asking if Chesapeake had contacted me as they hadn't contacted her. I said no, they hadn't and to my knowledge they've began fracturing at the site.

We have no way of knowing whether any further investigation was done by Chesapeake or not.

So, here's exactly how serious an operator other than Shell takes communication with orphan and abandoned wells. There are old wells around my area drilled in periods from the late 1870's through the 1970's. Some are not in the current area of exploitation, some are. Several operators through the years were very active exploiting oil and hauling it out by the barrel. There is also an old abandoned natural gas pipeline in the front of my home from a short lived gas field exploited during the 1970's. And, this all in an area only known in local history for the most part has being an oil and gas extraction area.

It doesn't seem reasonable that it be the public's observations and information along with a sense of urgency that results in having such discussions in the face of active fracturing job. We need this TGD to be as stringent as possible to protect public health and safety and our environment.

Thus, it seems wise to mandate operators share what information they have with the department although I know that's unlikely with an industry shroud in secrecy. Secondly, all operators especially those who like to gamble with our environment and public health and safety must be required to plug all old orphan and abandoned wells that are in their work areas, where communication has a potential to occur. This is

simply the practice of a good neighbor and operator – the story they told us when they hustled into our communities ten years ago. Of course, they could take Shell’s policy and just not drill in those areas.

Operators must be held responsible and accountable for all communications they experience and associated harm to the environment and public health and safety.

Thank you for the opportunity to comment on the TGD for unconventional oil and gas area of review. It is my hope that this document be only further altered to the point of it being more stringent.

Best Regards,

A handwritten signature in cursive script that reads "Emily Krafjack".

Emily Krafjack