



March 24, 2019

Hon. Daryl D. Metcalfe, Chairman
Hon. Greg Vitali, Democratic Chair
Members, Committee on Environmental Resources and Energy
Pennsylvania House of Representatives

Re: COMMITTEE ON ENVIRONMENTAL RESOURCES AND ENERGY, HB828

Dear Chairman Metcalfe, Democratic Chair Vitali and Committee Members,

We are opposed to HB828, legislation cited as “An Act amending Title 58 (Oil and Gas) of the Pennsylvania Consolidated Statutes, in development, further providing for well permits.”

Our opposition is based on the following:

1. The proposal to allow a multi-well pad permit under subsections (b), (c) and (e) for the development of oil or natural gas that relieves the operator of obtaining a separate permit for each well removes adequate oversight, monitoring, tracking, and control over individual wells that is necessary for the protection of the environment.
2. HB828 would remove public and municipal input regarding individual wells that is essential for effective local and public participation.
3. HB828 would reduce well reporting requirements that are necessary for accurate tracking, monitoring and accountability on the part of operators. The area of review survey must be expansive enough to locate existing wells, whether operating or closed, including orphan or abandoned wells.
4. A fee of \$2000 per well pad is inadequate to cover the costs of the agency to administer and inspect multi-well pads. Multi-well pads can be very complex, wells will be developed over time, and each well will have a unique forensic impact on the environment, the subsurface environment, groundwater systems, and geologic environment, each requiring reporting and Department oversight. This is why each well must be separately permitted. Funds to cover these costs should be the responsibility of the private company responsible for the activity and fees should reflect the government’s accurate and comprehensive administrative and enforcement costs.

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
dm@delawareriverkeeper.org
www.delawareriverkeeper.org

5. An expiration date of five years is not reasonable, leaves a permit in place while conditions can substantially change in a locale or region, including baseline water well sampling results, and encourages permits to be secured even when the well drilling is uncertain. There is no reason to extend permit life beyond the one-year current regulatory requirements.
6. Changing the location of a well perforation by 50 feet without a new permit lays the groundwork for confusion and inaccuracy in the field. The dangers presented by the interference of one well bore with another can be dangerous and even catastrophic should one well bore perforate or destabilize another.

We respectfully request that you and the Committee do not approve HB828 and not allow any further advancement of this bill through the legislative process.

Thank you for your consideration.

Respectfully submitted,



Maya K. van Rossum
the Delaware Riverkeeper
keepermaya@delawareriverkeeper.org



Tracy Carluccio
Deputy Director
Delaware Riverkeeper Network
tracy@delawareriverkeeper.org