

April 18, 2016

George D. Bedwick, Chairman
John F. Mizner, Vice Chairman
W. Russell Faber
Murray Ufberg
Dennis A. Watson
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

**Re: No. 3042 Environmental Quality Board #7-484
Environmental Protection Performance Standards at Oil and Gas Well Sites**

Dear Commissioners:

On behalf of the Chesapeake Bay Foundation (Pennsylvania Office), Pennsylvania Chapter of The Nature Conservancy, Pennsylvania Environmental Council, and Western Pennsylvania Conservancy, we are writing to respectfully ask your approval of proposed final rulemaking (No. 3042 Environmental Quality Board #7-484) slated for consideration by the Independent Regulatory Review Commission on April 21, 2016.

As the four environmental organizations represented on Governor Corbett's Marcellus Shale Advisory Commission (2011), we believe the proposed final rulemaking is appropriate and essential to modernizing the Commonwealth's long-outdated regulations, and for ensuring greater protections for our communities and public resources.

This rulemaking, authorized by Act 13 of 2012 and other environmental statutes, is the culmination of an unprecedented public process. At every step, the public, industry, environmental, local government, and other interests have been afforded full opportunity to participate in the rulemaking's development.

There is a critical need for finalizing this rulemaking, grounded not only on statutory overhaul of the Oil & Gas Act, but also extraordinary change in industry practices and impacts, concerns about current and future legacy issues borne by the Commonwealth, and the ongoing experience of incidents that have occurred across our state over the past ten years.

As with any rulemaking, there will be disagreement between interested parties. It is the job of the Department of Environmental Protection to solicit and consider comments received, and, based on their expertise and the laws of the Commonwealth, deliver proposed regulations they believe reasonable and necessary for the protection of the environment. Even though we could argue for further strengthening of the proposal, we recognize that the citizens of the Commonwealth are far better served by having this rulemaking approved and enforced.

We believe the Department of Environmental Protection have done their job, and have met the key environmental protection goals endorsed by the Marcellus Shale Advisory Commission and recognized in Act 13 more than four years ago.

We again ask that you approve the proposed final rulemaking. Thank you for your consideration.

Chesapeake Bay Foundation, Pennsylvania Office
Pennsylvania Environmental Council
The Nature Conservancy, Pennsylvania Chapter
Western Pennsylvania Conservancy