



## **PA COUNCIL OF TROUT UNLIMITED P5**

### **POLICY ON OIL AND GAS ACTIVITIES**

*APRIL 2008*

Pennsylvania Council recognizes that our water resources sustain all life and are important to human survival and well-being. Pennsylvania Council also recognizes that exploration and production of oil and gas are important to the economy of the Commonwealth. Historically, damage has been done to our surface and ground water resources by oil and gas exploration and production. Although more recently, laws and regulations have been adopted to prevent such damage, our legacy of over 150 years of drilling activity has resulted in the abandonment of pre-regulatory wells and production facilities that have a potential for polluting streams and aquifers.

Currently there are approximately 63,000 active oil and gas wells in Pennsylvania. An additional 6,500 wells have been registered by operators as orphans, and 2,100 abandoned wells have been identified by PADEP staff. Although PADEP has a program to plug orphan and abandoned wells, additional wells are being added to the inventory at a rate comparable to wells being plugged. The accuracy of the abandoned well inventory is questionable due to incomplete production reporting by operators. Present PADEP resources are not sufficient to accurately identify all abandoned wells or to plug all wells on the inventory within a reasonable period of time.

In recent years, due to the increased price of oil and natural gas, there has been a significant increase in the number of drilling permits issued. There is a correlation between the number of wells drilled and the number of complaints and incidents occurring. PADEP received 311 complaints regarding oil and gas activities during 2005. Twenty five of those complaints were related to surface water issues, such as erosion and sedimentation controls, spills, and other non-permitted discharges. While PADEP has increased staffing in response to the increase in drilling activity, no recent workload analysis has been done to determine current staffing needs.

Produced water, or brine, is usually a by-product of oil and gas production. Brine strength generally increases with the depths of the producing formations. Although sometimes considered a beneficial byproduct and used for dust control on dirt and gravel roads or for snow and ice control on paved roads, it is more commonly disposed as a waste. There are 8 permitted brine treatment plants where brine is treated prior to discharge to a river or stream. There are 2 small treatment facilities where brine is discharged under a stripper oil well general permit. Brine disposal also is permitted at 26 disposal wells, 12 municipal sewage treatment plants, and 2 industrial waste treatment facilities. No discharges of brine are permitted to Exceptional Value or High Quality streams.

To ensure that Pennsylvania's water resources are not degraded by oil and gas exploration and production, Pennsylvania Council recommends the following policy guidelines:

1. All currently producing, plugged and abandoned wells should be inventoried and included in the Geographic Information System (GIS) inventory of the Commonwealth. PADEP should prioritize the abandoned wells for inclusion on the well plugging inventory, and explore additional alternatives, resource needs and strategies to assure that all problem wells are plugged as they are identified, and to assure that all wells on the inventory are plugged.

2. In order to fully accomplish its responsibilities for permitting, inspecting and otherwise regulating oil and gas exploration and production activities, PADEP should undertake a workload analysis to determine needed staffing resources.

3. PADEP should continue to prohibit surface discharges of brine into High Quality and Exceptional Value watersheds. PADEP should apply and enforce Chapter 93 water quality standards in all other watersheds where oil and gas development discharges are permitted.

4. Full-cost bonding should be required to ensure that all permitted wells, when production is suspended or terminated, are closed using the most current Best Management Practices (BMPs) in accordance with Commonwealth rules and regulations.

5. On Commonwealth-owned land, where Commonwealth agencies own the land in fee, oil and gas development should be prohibited in Exceptional Value watersheds and increased oversight should be applied in High Quality watersheds.