



June 5, 2024

VIA EMAIL to Andrew McMenemy for distribution to PA House ERE Committee
AMcMenamin@pahouse.net

Re: HB 2834

The trade organizations identified above represent individuals and businesses engaged in conventional oil and natural gas production in Pennsylvania. We OPPOSE HB 2834.

Brine (natural ocean water) is produced from conventional oil and gas wells. Like several other states, Pennsylvania permitted townships and other caretakes of dirt roads, to use brine for the purpose of dust suppression. Dust from dirt roads is the second most significant source of air pollution in the United States. Naturally occurring brine has served as an economical source of dust control for decades.

Brine spreading in Pennsylvania was performed in accordance with criteria established by a joint DEP-EPA study conducted in 1996. This study was based upon actual field analysis. The 1996 study concluded that brine spreading was both effective and safe. There are NO field study tests which conclude to the contrary. Recently, DEP has contracted for two types of studies. The field study found no threats to public health. The other type of studies have been limited to the lab; in those studies it was found that naturally occurring brine was the most benign of the products (both brine and commercial products) examined in the lab.

HB 2834 would bar the spreading of brine. Such ban works to the significant detriment of Pennsylvania municipalities such as townships. Many rural townships have dozens of miles of dirt roads. Only brine is economical. The use of brine has the additional beneficial impact of creating an outlet for the use of brine. Brine is classified as a residual waste by the state and when not spread for dust suppression, other outlets for brine disposal must be sought. Due to increasingly restrictive regulation by the state such other outlets are dwindling, down over 75% from just a few years ago. Some producers are unable to find any outlets at all, thus reducing production and in turn reducing jobs not only in the production industry but also in associated industries and businesses, such as refining or merely in the shops and businesses patronized by conventional oil and gas producers.

HB 2834 is not sound law and we encourage a NO vote.



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