

The Office of Miner's Health, Safety and Training appreciates the opportunity to participate in this Office of Oil and Gas program review meeting. We would like to identify a few areas of concern.

Mapping / Location

The OMHST has regulated coal mining operations in the vicinity of and into and through wells for a many years. It has been our experience that the ability to safely mine near or into and through wells starts with the ability to accurately locate and map all wells that may lie ahead of proposed mining. This is becoming even more relevant with vertical to horizontal coal bed methane wells. Accurately locating wells is a critical element if a mine-through is contemplated. We believe that deviation surveys should become mandatory for all future wells, and that accurate as-built coordinate locations should be provided as well.

Plugging

Wells must be properly plugged to allow for a safe mine through. We strongly encourage the coal and oil & gas industries to pursue an arrangement privately or if necessary through the regulatory process to see that conventional wells are plugged in a manner to accommodate a safe mine-through upon completion. Our history of plugging and then re-plugging wells seems inefficient. Plugging and / or hazard mitigation for horizontal to vertical coal be methane wells is of course an entirely different animal and remains a work in progress.

Well Density (Spacing)

Since future drilling is targeted toward Marcellus Shale development, we believe that it is in the interests of both the oil & gas and coal industries to drill from existing sites whenever possible. Simply put, the closer and more densely wells are spaced, the harder it becomes for mining operations to avoid them.

Drilling Near or Through Active Mine Workings

The OMHST is concerned about drilling near or through active mining operations. We are particularly concerned about drilling through sealed areas of active mines. Be assured that the OMHST will intervene if attempts to drill through sealed areas of active mines while persons are working underground.