

III. PUBLIC INVOLVEMENT

Two informal scoping meetings were held on the GEIS in Jamestown and Olean in March, 1985. A thirty-one page outline was distributed in advance and the Department received many suggestions on additional topics to be included. These suggestions were incorporated into the draft that was released for review in early 1988.

Approximately 1,000 copies of the draft GEIS were released for public review in March and April 1988. The distribution list included affected communities, government agencies, public interest groups, members of the petroleum industry, and the general public. More than 850 written and oral comments were received from the following interested parties:

Government Offices

- Allegany County Office of Economic Development
- Jamestown Board of Public Utilities
- New York State Department of Agriculture and Markets
- New York State Department of Environmental Conservation
 - Division of Fish and Wildlife
 - Division of Hazardous Substances Regulation
 - Division of Lands and Forests
 - Division of Regulatory Affairs
- U.S. Representative Amo Houghton

Industry

- Envirogas, Inc.
- Honeoye Storage Corporation
- Kidder Exploration, Inc.
- Lenape Resources Corporation
- National Fuel Gas Supply Corporation
- Pennzoil Products Company
- Quaker State Corporation
- Universal Resources Holdings, Inc.

Industry Organizations

- Independent Oil and Gas Association of New York
- New York State Oil Producers Association

Environmental Organizations

- Chautauqua County Environmental Management Council
- Monroe County Soil and Water Conservation District

Individuals

- Dr. Peter S. Gold - SUNY, Buffalo
- William J. Plants - Cuba, NY

Public hearings on the draft GEIS were held in June 1988 in Albany, Buffalo, Canandaigua, Ithaca, Jamestown, and Wellsville. Extensive oral testimony was presented by interested parties at the hearings in Buffalo, Jamestown, and Wellsville in the historic oil and gas production areas.

Each written and oral comment received on the draft GEIS is printed in its entirety with the Department's response in the Comment-Response Table. Copies of the letters and testimony are printed in the table with the Department's coded responses. A listing of the codes used for each organization/individual can be found at the front of the Comment-Response Table.

It is readily apparent from the above list of commentators that many diverse and sometimes opposing views were expressed. The concerns of environmental groups and government agencies are often quite different than those of industry. The Department responses recognize, as did the draft GEIS, that all concerns are valid. The Department's role is to strike the balance that best meets our mandate under the law to prevent waste, protect correlative rights, and to prevent pollution while ensuring greater ultimate recovery of oil and natural gas.

A careful reader of the Comment-Response Table will note many instances where the Department agrees with the commentator and/or acknowledges possible alternatives to Department proposals. However, there are also many counter-proposals and recommendations that had to be rejected because, even though they spring from valid concerns, they do not fit within the framework of our mandated goals. Such proposals fall on both ends of the spectrum;

some are more stringent than the original recommendations and some are less so. The Department is endeavoring to strike the same reasonable balance in new and revised regulations.

Seven topics were raised so frequently that the Department decided it was more efficient to prepare general Topical Responses instead of repeatedly responding to the same points in the Comment-Response Table. The Topical Responses address:

1. Public taking without compensation
2. Visual resources and assessment requirement
3. Environmental assessment form and site-specific permit conditions
4. Access roads as part of project
5. Reasons for including the proposed regulations in the GEIS
6. Surface/mineral owner lease conflicts
7. Soil as a public natural resource

Because several hearings were held statewide, the individual oral comments delivered at each hearing are included in the Comment-Response Table. Instead of including complete transcripts of all the Public Hearings in the final GEIS, just the record from the Albany Public Hearing is included. This decision was made to avoid duplication and give equal weight to all comments regardless of type.