



**Pennsylvania AWWA**  
American Water Works Association

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April 5, 2022

Leigh Chapman  
Acting Secretary of the Commonwealth  
Pennsylvania Department of State  
302 North Office Building  
401 North Street  
Harrisburg, PA 17120-0029

**RE: Establish Professional Licensing Criteria for Private Well Drillers**

Secretary Chapman:

The Pennsylvania-Section, American Water Works Association (PA-AWWA) consists of 2,500 + members representing all classes of water utilities in Pennsylvania, including those owned by investors, authorities, and municipalities, plus regulators, vendors, contractors, engineers, and others dedicated to promoting the health and welfare of Pennsylvania by providing affordable drinking water of superior quality and sufficient quantity. The Water Utility Council of AWWA (WUC) includes representatives from the National Association of Water Companies, Pennsylvania Chapter; Pennsylvania Municipal Authorities Association; Pennsylvania Rural Water Association; and Water Works Operators' Association of Pennsylvania.

The WUC offers its support for the Pennsylvania Groundwater Association's (PGWA) proposal to establish professional licensing criteria for private well drillers which would strengthen accountability within the industry; ensure industry construction and siting standards are upheld; and establish much-needed consumer protections.

Water wells are the primary source of drinking water for millions of Pennsylvanians. Yet, the Commonwealth is one of only two states to not enforce industry standards regarding well siting and construction. The proper siting and construction of private wells is critical for safeguarding water quality and protecting public health.

We're particularly supportive of PGWA's proposal because it would:

- Protect human health and safety as well as Pennsylvania's water resources.
- Utilize Department of State's existing licensing mechanisms which reduces costs to the Commonwealth and the industry.
- Promote a process where the industry is heavily engaged to ensure the licensing process meets the needs and considerations of a diverse set of drillers.

- Establish licensing criteria that allows well drillers to choose either an expert or certified pathway to licensing that creates a flexible framework for workers within the industry to seek only the training and/or experience needed based on their specialty.
- Focuses on existing industry standards without adding new regulations or permitting processes. In doing so, licensed drillers would be required to uphold existing industry standards related to siting and constructing wells in Pennsylvania.
- Establishes greater accountability within the industry by requiring companies to demonstrate bonding and liability coverage.
- Creates a more transparent pathway to employment in the drilling industry through continuing education and examination requirements.
- Establishes a grandfather clause for a two-year period so that members of the industry can continue their work simply by demonstrating that they have worked in the industry for the appropriate years, have been licensed in another state, or have taken the appropriate exams through the National Ground Water Association or other certifying organization.
- Establishes ongoing (but non-overburdensome) continuing education requirements for drillers to ensure that they are keeping up with regulatory requirements, industry best practices, and safety provisions.
- Requires drillers to submit appropriate reports (intent to drill, well completion, abandonment) to the Department of Conservation and Natural Resources as a requirement of licensing. Currently, a large percentage of drillers do not comply with these statutory provisions.
- Strengthens consumer protections by ensuring establishing transparent industry protocols and

The clear goal of this proposal is to bring a level of accountability to the industry, safeguard Pennsylvanians' health and safety, and ensure consumer protections are in place.

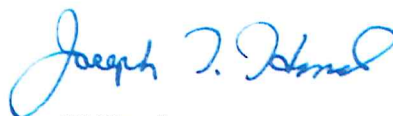
More than 3 million Pennsylvanians rely on approximately 1 million private wells for drinking water. Improperly constructed water wells can lead to poor water quality by providing pathways for bacteria and contaminants such as naturally occurring shallow methane gas migration into water supplies. Ensuring that water wells are constructed properly from the start will help to prevent water quality problems in the future.

The WUC supports the PGWA's sunrise application because it is a pragmatic and much needed step forward in bringing this industry into the 21st century.

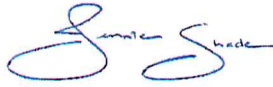
Respectfully submitted,



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