

To: Edward Hanlon/DC/USEPA/US@EPA

Date: 03/01/2011 12:08 AM

Subject: Comments on the EPA draft plan to study the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources

February 28, 2011

Edward Hanlon, Science Advisory Board

RE: Comments on the EPA draft plan to study the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources

Dear Mr. Hanlon,

Certainly the EPA has proposed a very comprehensive and detailed study of the effects of hydraulic fracturing on drinking water resources.

However, there are some inadequacies and, to my mind, one major flaw in the draft study plan, which is the proposed timeline of the study. Since there are thousands of unconventional, hydrofracking wells already in operation throughout the US, and thousands more under contract for drilling -- including those in the NYS watershed for NYC drinking water -- this study will be ineffective in what I would assume to be an implicit goal and what should be the EPA's highest priority: not just to determine the effects of hydrofracking on the drinking water of a vast area of the US, but, if it is negative and highly toxic, to prevent such contamination.

Yet some major goals such as: an estimate of the sustainable number of HF operations per year for a given region or formation; identification of impacts of HF on water quality near HF sites before and after water withdrawals; identification of impacts to drinking water resources resulting from the accidental release of HF fluid, and assessment of current management practices related to on-site chemical storage and mixing will not be completed until 2014.

Unless there is a moratorium on hydraulic fracturing until the study is complete, all this research will be a waste: drinking water supplies throughout the US -- including that of millions of NYC residents -- will already be contaminated.

Some other flaws are the fact that while the EPA may request a list of chemical additives, much of the information regarding the identity and concentration of chemicals used in hydraulic fracturing fluids is considered by the industry to be proprietary and, therefore, confidential. For such a vital resource, transparency in this regard should be mandatory.

It is also essential information that should be given to landowners before they are asked to sign a lease.

The study should also be expanded to include the effect on air quality.

Thank you for the opportunity to comment on the EPA's draft study.

Sincerely,

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