



American Association of Blacks in Energy®
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**Frank M. Stewart, President and
COO**

February 28, 2011

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC

RE: Federal Doc No: 2011-2873

Dear Administrator Jackson:

My name is Frank Stewart and I have the pleasure of serving as the President and Chief Operating officer of the American Association of Blacks in Energy (AABE), a national association of energy professionals. Through my work with this association and through my experience in the energy and environmental space, I have closely followed the ongoing debate about hydraulic fracturing, both at the state and the federal levels. Because of the very important role that natural gas will play in our nation's energy future, I am eager to know the Environmental Protection Agency's process for this study. Unfortunately, from what I have gathered from reading the draft study plan, it appears that the Agency is focused on seeking out risk rather than evaluating the safety practices that are currently in place.

In my opinion, the core focus of the study ought not be finding worst case scenarios but utilizing trusted modeling tools to study any hazards associated with standard practice by the industry. For example, the proposed study plan would develop new computer models instead of using available hydraulic fracturing models with a trusted record of performance. Seeking out possible contamination pathways is not a measure of risk or a fair evaluation of fracking. This study should not be hampered at the outset by assumptions of potential danger to the health of our communities. All too often such assumptions turn into self-fulfilling prophecies at the detriment to the issues being studied.

- I. The first step in the Agency's process should have been to closely examine the long list of prior research on hydraulic fracturing that has already been completed and peer reviewed. The proposed study plan does not indicate any intent to discuss EPA's 2004 report which establishes that there have been no instances of contamination of ground water and that there was a very low probability of any future risk. Once these materials have been reviewed, evaluated, and any failures in the analysis identified, then the reviewers should be in a much better position to move forward.



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- II. The study should also make clear the Agency's intent to release all of the documents at the conclusion of this phase and should be open to a full and complete peer review process.
- III. I trust the EPA does not intend to draw conclusions from specific, isolated instances as a reading of this study plan indicates. I would strongly caution against such an approach.
- IV. Additionally the EPA should be prepared to explain that this study is only part of the analysis that needs to be conducted.
- V. I would further hope that the Agency plans to follow this study with a plan to develop the capacity to identify and manage all of the issues that arise because this natural gas resource is so important to our nation's economic, political, and environmental future that we can not afford to let any technical issues prevent our access to this energy.
- VI. The hydraulic fracturing study should review the best practice standards not the worst practices. Ultimately the study should acknowledge that its intent is to craft a road map to safe, environmentally sound production of natural gas.

I thank you for your time in reviewing these comments, and I hope that EPA will consider some of the recommendations outline in this letter.

Sincerely,

Frank M. Stewart, President and COO
American Association of Blacks in Energy