



PO BOX 103
Fremont Center, NY 12736
April 10, 2010

Mr. Edward Hanlon
Designated Federal Officer
EPA Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Hanlon,

I am submitting these comments on behalf of Catskill Citizens for Safe Energy (CCSE), a non-profit organization concerned about the environmental, health and economic impacts that shale gas extraction might have on our region. I attended the EPA's public meeting on April 7th and listened to the public comments and committee discussion.

CCSE fully supports the positions of Natural Resources Defense Council, Riverkeeper, Damascus Citizens for Sustainability, Friends of the Upper Delaware River, and The Wilderness Society regarding the scope and research approach for the EPA study on hydraulic fracturing.

1. The full lifecycle approach must be used. The entire process must be thoroughly studied and understood. Lifecycle cannot stop at well closure as very long-term effects of slow moving contaminants must be considered for future generations.
2. The EPA study must be independent, unbiased, and performed by experts outside the industry who do not stand to gain financially from hydraulic fracturing or natural gas extraction. Too many claims of environmental and economic impacts have been made by the gas industry or by individuals with ties to the industry, all with potentially biased points of view. I draw your attention to the observation that five of the seven scientists who reviewed the 2004 study had industry ties. See: [EPA Findings on Hydraulic Fracturing Deemed "Unsupported"](#) and [EPA Scientist Blows the Whistle on the 2004 Study](#).
3. Cumulative impacts must be studied and understood. The effects of the projected number of wells into the future must be included in the study of cumulative impacts. In addition, the study of cumulative impacts should include not only the

effects of using ground or surface water for multiple gas wells, but also cumulative effects of all types of industries, combined, that use our ground or surface water. It must also include cumulative impacts of all additives and all potential compounds that may be produced throughout the entire lifecycle of the process.

4. The full range of health and environmental impacts must be included. Impacts on drinking water, surface water, air, and soil must all be included. Also storage and disposal of fluids and the effects of open-air pits must be studied and clearly understood.
5. Independent field research must be done, without reliance on existing literature or past studies that may be based on biased or incomplete industry provided data.

CCSE fully supports the recommendation made by Committee Member Dr. Paul Westerhoff that for this study, private water wells in rural areas be specifically researched, as EPA usually only covers analysis of public water supplies.

CCSE is looking forward to seeing the results of a comprehensive and unbiased study from the EPA. Please let us know if CCSE can be of any help in this massive research effort.

Best regards,

Jannette M. Barth, Ph.D.