

**EPA Science Advisory Board  
Hydraulic Fracturing Research Advisory Panel  
Public Teleconference February 1, 2016  
Oral Statement of John Noel**

From: John Noel  
Sent: Monday, February 01, 2016 4:13 PM  
To: Hanlon, Edward <Hanlon.Edward@epa.gov>  
Subject: My testimony today

Hi Ed – Attached please see a copy of my testimony I gave today on the call. Thanks

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SAB Panel Teleconference Testimony  
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I want to commend the SAB Panel members who lent their time and expertise into developing recommendations designed to improve the public's understanding of potential threats to drinking water.

Clean Water Action strongly agrees with the recommendations and main themes in the draft report. The Panel went to considerable effort to highlight its primary recommendation which is that the main findings "are inconsistent with the observations, data, and levels of uncertainty."

Specifically, the Panel was correct to highlight the seemingly political and conflicting statement, "*we did not find evidence that hydraulic fracturing mechanisms have led to widespread, systemic impacts on drinking water resources*" as not reflecting "uncertainties and data limitations" and that the line is "ambiguous and requires clarification." This revision should be prioritized by EPA in the rewriting process.

When submitting the report to EPA, the Panel should urge the Agency to incorporate its recommendations and commit to finalizing the Assessment. It is important that EPA publish a final and citable Assessment that can be used to inform policy makers and the public on threats to drinking water. Any effort to delay or stall finalization jeopardizes the incredible amount of progress that went into this groundbreaking synthesis of impacts.

We also agree:

- EPA should discuss upfront the myriad of uncertainties implicit in any discussion of impacts to drinking water. This includes information and analysis sealed in non-disclosure agreements in legal proceedings over water contamination.
- EPA should ensure that the incredible work over the last 6 years continues to build on itself and outline research needs and steps to reduce uncertainties in future work.
- EPA must include the analysis and status of three investigations that were already underway by EPA in Pavilion, WY, Dimock, PA and Parker County, Texas.
- EPA should acknowledge upfront that impacts are inherently local, sometimes severe, and should be not deemphasized as a result.

We disagree that best management practices should be included in the final Assessment. While industry best practices are of course important, they are not what this Assessment is designed to articulate. The point of the research was to look for where impacts have happened and where they can persist in the

future. EPA was directed by Congress to look at potential impacts of fracking activities on drinking water. This does not include EPA's assessment or recounting of industry best practices.

The Panel undertook an extremely transparent review process over a series of months. The results were consensus recommendations developed by a group of 30 scientists and engineers. These recommendations are reasonable and relatively minor compared to the breadth of EPA's Assessment. Aversion to the review process from outside groups should be seen as an attempt to obfuscate the impacts of hydraulic fracturing and limit the public's understanding of potential threats to drinking water.