

May 29, 2013

Dr. Angela Nugent
Designated Federal Officer
EPA Science Advisory Board Staff Office (1400R)
US EPA
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Dr. Nugent:

On behalf of America's Natural Gas Alliance (ANGA), the American Exploration and Production Council (AXPC), the American Petroleum Institute (API), the Colorado Oil and Gas Association (COGA), the Independent Petroleum Association of America (IPAA), and the Western Energy Alliance (WEA), we appreciate this opportunity to submit comments to the Environmental Protection Agency's (EPA) Scientific Advisory Board's (SAB) consideration of additional fact-finding regarding Effluent Limitation Guidelines for shale gas. We believe that currently there is not a need for the Chartered SAB to be involved further, on a scientific and technical basis, regarding EPA's ongoing activities related to establishing a shale gas ELG.

The companies represented by this letter have been producing natural gas and complying with ELG standards for decades. We have also been engaged with EPA's Office of Water for over a year on this issue and are currently working to help the agency understand our operations, including our handling of wastewater and the technologies that exist today. As such, we share your goal of ensuring the agency is able to make an informed decision regarding the rulemaking process for shale gas effluent.

Thanks to technology and innovation, our industry has been able to unlock vast shale resources. We have also made great progress in developing technologies to manage produced water associated with our operations. Decades of experience have resulted in a well-developed list of treatment options including but not limited to sedimentation, coagulation/flocculation, oil water separation, biological treatment, filtration, membrane technologies and evaporation/distillation. It should be noted that many of the technologies have been reviewed and accepted by EPA as they have established both direct discharge and indirect discharge ELGs for the offshore oil and gas sector but were not considered when EPA defined the zero discharge ELG for onshore direct discharge.

EPA's Office of Water, in its March 8, 2013 response to your questions, recognizes that technologies are practiced and demonstrated by the O&G industry at full scale to be highly effective. Because existing technologies are in use and proven effective, there is no need to consider new science or technology as part of the rulemaking process. For these reasons, we believe further action by the SAB on the ELG for shale gas is unwarranted and that decisions on any potential rulemaking process in the future should be made by EPA's Office of Water.

As representatives of the oil and gas industry, the signatory associations remain ready and willing to further assist the EPA's Office of Water in its rulemaking process.

Sincerely,

Amy Farrell
America's Natural Gas Alliance

V. Bruce Thompson
American Exploration & Production Council

Amy Emmert
American Petroleum Institute

Andrew Place
Colorado Oil and Gas Association

Lee Fuller
Independent Petroleum Association of America

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