



June 16, 2010

Dr. Angela Nugent
Designated Federal Officer
EPA Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, D.C. 20460

Re: Science Advisory Board Environmental Engineering Committee Hydraulic Fracturing
Research Plan Review

The Oklahoma Independent Petroleum Association (OIPA) is providing comments on the Environmental Protection Agency's (EPA's) Science Advisory Board (SAB) Environmental Engineering Committee (EEC) Hydraulic Fracturing Research Plan Review.

The OIPA represents approximately 2000 small to large independent crude oil and natural gas producers that operate in Oklahoma that utilize hydraulic fracturing in their operations. Nationwide, independent oil and gas operators drill approximately 90 percent of the oil and gas wells in the U.S., and produce 80 percent of U.S. natural gas and 65 percent of U.S. crude oil.

The use of hydraulic fracturing is a key completion process in making oil and gas exploration projects in Oklahoma economic. Without it, existing wells that would have been depleted years ago, or wells that would have never been commercially productive in the first place, are made viable.

We support the comments submitted to you on June 9 by the IPAA. In addition, we provide the following comments.

We think the plan should focus on the research that directly responds to the Congressional request. However, on page 17- line 21, it appears the research plan contemplates long-term research to investigate aquatic ecosystems and the ability to support fishing and recreation. In other places in the document, there is discussion of research that is outside the scope of the Congressional request. For example, the plan discusses the evaluation of water quantity issues (page 19- line 37), best management practices that affect quality and quantity of flowback and produced water (page 22 -line 3), the development of "green" additives (page 22 -line 5), etc. Given both the time and funding limitations, we think the plan should prioritize and focus research on the pathways to drinking water exposure, identify the associated risks of those pathways, how those risks are currently being managed, and are the risks being managed effectively.

Finally, we think it is imperative that state oil and gas regulatory agencies be involved in the research process to provide information on their regulatory requirements that protect ground water.

Again, we appreciate the opportunity to provide input on draft SAB EEC Hydraulic Fracturing Research Plan. Thank you in advance for your consideration.

Sincerely,

Angie Burckhalter
V.P., Regulatory Affairs