

KEUKA LAKE ASSOCIATION

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Mr. Ed Hanlon
Designated Federal Officer
EPA Science Advisory Board Staff Office
USEPA Science Advisory Board (1400F)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Fax: 202-233-0643/0645

**RE: Keuka Lake Association Input to the Design of EPA Hydraulic Fracturing
Research Study**

The Keuka Lake Association (KLA) was established in 1956 and represents over 20,000 residents who draw water from the Keuka Lake Watershed, one of the Finger Lake Watersheds in Western New York State. The KLA has worked successfully with the multiple government entities in the Keuka Lake Watershed to establish and support several municipal compact organizations that maintain the quality of Keuka Lake water. The KLA mission is to “Preserve and Protect Keuka Lake”.

The KLA recognizes the significance of natural gas in offsetting coal usage, supporting domestic energy independence, and providing revenue to landowners and government entities.

Keuka Lake and the Finger Lakes are vital sources of drinking water and recreation in Western New York. Keuka Lake is a New York State AA classified lake and the direct source of drinking water for these 20,000 people who obtain water directly or through a municipal source. The Finger Lakes are deep lakes with depths ranging from 180 feet to over 600 feet. These lakes are as important to Western New York as the New York City reservoirs and aquifers are to New York City.

The Marcellus Shale layer in the Finger Lakes area is relatively near to the surface-- between 1000-2000 feet, and only 50-100 feet thick. The separation in depth between the bottom of lake and the top of the Marcellus Shale layer could be less than 1000 feet.

The KLA is concerned that the Federal Clean Water Act exempted Horizontal Gas Well Drilling using Hydrofracking from any Federal regulation. Horizontal Gas Well Drilling using Hydrofracking is significantly different from vertical well drilling and needs to be considered separately.

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The KLA strongly urges that the EPA identify a well respected independent group of scientific people who do not represent the natural gas industry and/or any specific conservation or water quality group to come up with regulations for hydrofracking that also protect the water resources—particularly Keuka Lake, the Finger Lakes, and the Great Lakes Basin which represents the largest supply of fresh water in the country.

The KLA is particularly concerned about the likelihood of confining hydrofracking chemicals and flowback in the shale layer and preventing any migration into other layers where surface water could be negatively affected. Our concerns relate to fissures, faults and abandoned wells that are not sealed or sufficiently sealed—all of which are in abundance in the geology of this area.

The second concern is to require hydrofracking waste treatment plants that will render the flowback water suitable for discharge into surface streams and rivers. The KLA opposes the use of injection wells for disposal of the huge volumes of untreated flowback water for the same reasons about lack of confinement in a sub surface layer.

The KLA is concerned about spills and accidents with hydrofracking fluids and flowback waste during use, storage and transport—especially on the steep Keuka Lake watershed slopes.

Given the short period of time to respond, the KLA is responding with its basic concerns regarding hydrofracking and well disposal.

Thank you for your consideration of these important issues.

Sincerely,

James F. Barre
Chair, Hydrofracking and Well Disposal Committee
Keuka Lake Association

cc: David A. Paterson, Governor of the State of New York
Jack K. Dahl, Director, Division of Mineral Resources, New York DEC
Jim Bacalles, New York State Representative
George Winner, New York State Senator