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Comments following EPA SAB HF study panel discussion

First, I'm pleased, and frankly I suspect that core members of the EPA team are pleased, that what was presented as a topline finding of the assessment has been identified as inconsistent with the actual assessment.

It will be interesting to see whether the administration comes clean on this point.

Second, in my written comments submitted in August, I researched the EPA's past use of "widespread"... you may find the results of interest.

I think it's worth noting that from the study to the press release, the statement evolved from "we did not find evidence of widespread, systemic impacts" to "assessment shows no widespread, systemic impacts."

Third, while the agency's rationale for including high profile case studies would be awkward... While that is amusing to those unaffected, I don't believe it is a reason to not present the agency's rationale.

Fourth, re prospective studies...I would argue that, given the relatively low frequency of well integrity failures, for example, a handful of prospective studies under the brightlights and supervision of the EPA may not be representative.

Lastly, I would just like to point you to my written comments about the computational complexity of modeling, and when the "curse of dimensionality" will come into play.

Page 6-41 presents the sparse sampling of parameter space of a simplistic scenario, and it required 576 simulations. The scenario does not approach being able to approximate potential flows of contaminants, over long periods of time, on the spatial scale of widespread drilling and fracking in a region.

It is questionable whether such simulations on a regional scale will be tractable even on the most advanced supercomputer.