



March 31, 2010

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The City of New York (City) would like to commend the Environmental Protection Agency (EPA) on initiating a comprehensive study on the potential adverse impacts that hydraulic fracturing may have on water quality and public health. Horizontal drilling and hydraulic fracturing are expanding into new regions and pose new risks that are not fully understood. It is critical that this activity be conducted with appropriate safeguards in place, based on the best scientific information. Toward that goal, the City offers the results of a recently completed study for consideration by the Science Advisory Board (SAB) in their review of EPA's proposed study approach.

The New York City water supply provides high quality drinking water to nearly half the population of the State of New York — 8 million consumers in the City and 1 million in upstate counties. The Marcellus Shale underlies the entire Catskill/Delaware portion of the water supply, which typically supplies over 90% of daily demand, a source of such high quality that the water does not require filtration. Due to concerns over the interest in natural gas drilling in our watershed, the City undertook a study, with the assistance of Hazen and Sawyer/Leggette, Brashears and Graham, to evaluate the potential impacts to water quality, water quantity and water supply infrastructure. The results are presented in two reports (attached). Based on this analysis, the City concluded that horizontal drilling and high-volume hydraulic fracturing using the current technologies pose an unacceptable threat to the water supply of nine million New Yorkers, and cannot be safely permitted in the watershed.

In closing, the City encourages the SAB and EPA to take a hard look at this activity and to recognize that the absence of contamination does not necessarily imply an activity is safe but may actually reflect extensive gaps in monitoring information. We hope that the attached information is useful and would be happy to answer any questions the SAB or EPA has on this work.

Sincerely,

Handwritten signature of Caswell F. Holloway in blue ink.

c: Hon. Judith Enck, EPA Administrator for Region 2