

To: Edward Hanlon/DC/USEPA/US@EPA

Date: 04/09/2010 02:29 PM

Subject: Comments re EPA Study - Hydraulic Fracturing and Drinking Water Supplies

Dear Mr. Hanlon:

I represent the Otsego Lake Watershed Supervisory Committee, which has the authority under NYS Public Health Law to protect Otsego Lake as a drinking water supply for the Village of Cooperstown, NY. The watershed is located in northern Otsego County, NY, and is within the shale gas region of NYS (shale formations: Marcellus, Utica, and Trenton/Black River). Thousands of acres have already been leased for gas drilling in the watershed.

The scoping document for the design of the EPA research study on "Potential Relationships Between Hydraulic Fracturing and Drinking Water Resources" is very comprehensive. However, we feel the following issues need to be included:

#### Drinking Water Standards

It has been decades since the federal drinking water standards for maximum contaminant levels were updated. Including both primary and secondary standards, there are approximately 100 contaminants listed. The number of compounds that can potentially be used in hydraulic fracturing fluids is close to 300. The drinking water standards need to be updated as part of the study.

#### Low-Level Contamination

The study will look at health risks, but not to the extent needed. Due to the potential for both chronic and acute releases of chemicals into the environment, both surface and sub-surface, it is possible that drinking water supplies will become contaminated with low-level concentrations of toxic chemicals. The chemicals will include those currently listed in the drinking water standards and many that are not. The concentrations may be below MCLs (maximum contaminant levels) for the chemicals on the list, and at very low levels for others. However, these contaminants cannot be removed from drinking water using conventional filtration methods, and could accumulate over an extended period of time. Therefore, the study needs to look at the public health effects of long-term exposure to low levels of toxic chemicals.

## Drinking Water Supplies - NYS

Given that it won't be until 2012 until the initial results of the study are available, it is strongly recommended that gas drilling using high-volume hydraulic fracturing be banned from drinking water watersheds and set back seven miles from public wells in NYS until the study results are available.

Thank you.

Sincerely,  
Win McIntyre  
Otsego Lake Watershed Coordinator