

Dear Mr. Hanlon,

I am the Policy Committee Co-chair of the Northeast Organic Farming Association of New York, and the Chair of the Policy Committee of the Delaware County Farm Bureau of New York. At their respective Annual Meetings, Membership of NOFA-NY and New York Farm Bureau unanimously approved support of the FRAC Act. Both organizations also approved policies that relate directly to proposed regulations by the Department of Environmental Conservation of New York to regulate hydraulic fracking of horizontally drilled wells in its draft Supplemental Generic Environmental Impact Statement. I believe these policies for proposed gas drilling in New York State relate directly to the SAB Environmental Engineer Committee Hydraulic Fracturing Research Plan Review. Please include this letter and these policies in your public comments on the SAB Environmental Engineer Committee Hydraulic Fracturing Research Plan Review.

Sincerely,

Mark Dunau

New York Farm Bureau Policy Concerning the Environmental Impacts of Hydraulic Fracking of Horizontal Gas Wells

NATIONAL

We support HR 2766, FRAC Act (Fracking Responsibility and Awareness of Chemicals Act), which would repeal the exemption of hydraulic fracking in the Safe Water Drinking Act, and require the public listing of all chemicals in hydraulic fracking fluid (but not the proprietary formulation of these chemicals).

STATE

New York Farm Bureau Policy Concerning the Draft SGEIS

The New York State Department of Environmental Conservation's draft Supplemental Generic Environmental Impact Statement (dSGEIS) concerning hydraulic fracking of horizontal gas wells is not protective enough of New York State's agriculture, environment and people. We recommend that DEC, at the very least, include the following items in the final dSGEIS:

1. Include in the SGEIS a comprehensive assessment of impacts on the environment and human health by numerous gas wells.

2. Develop a practical plan for the disposal of all waste water that will be generated by hydraulic fracking of numerous horizontal gas wells, inclusive not only of fracking fluids, but all waste that will be generated by drilling and fracking of the Marcellus Shale.
3. Require gas drilling companies to disclose their proprietary recipe for hydraulic fracturing fluid to the agency, and disclose to the public a list of the chemicals used in the recipe, as a condition of drilling.
4. Include a comprehensive list of safer alternatives to currently used fracking chemicals that may impact human health and safety.
5. Prohibit gas or oil companies from using water from aquifers for drilling and hydraulic fracturing.
6. That all expenses to county and local government to implement the SGEIS be the responsibility of gas companies.
7. Propose a comprehensive rule making package that would accompany the new draft SGEIS for drilling in the Marcellus Shale gas formation to fully ensure the protection of New York State's agriculture and natural resources.

Northeast Organic Farming Association of New York Policies Concerning the Environmental Impacts of Hydraulic Fracking of Horizontal Gas Wells

NATIONAL

We support HR 2766, FRAC Act (Fracing Responsibility and Awareness of Chemicals Act), which would repeal the exemption of hydraulic fracing in the Safe Water Drinking Act, and require the public listing of all chemicals in hydraulic fracing fluid (but not the propriety formulation of these chemicals).

STATE

Resolved:

The Northeast Organic Farming Association of New York condemns the New York State Department of Environmental Conservation's ("DEC's") draft Supplemental Generic Environmental Impact Statement ("SGEIS") concerning hydraulic fracking of horizontal gas wells as not protective of New York State's agriculture, environment and people. We demand that DEC:

1. Include in the SGEIS a comprehensive cumulative impact assessment of the numerous gas wells planned, not limit the SGEIS to the environmental impact of one well at a time (as currently is the case).
2. Include in the SGEIS a comprehensive assessment of impacts on human health by numerous gas wells.
3. Include in the SGEIS an assessment of the environmental impacts on the environment and human health of a vast pipeline, condenser and compressor system needed to service numerous gas wells.
4. Develop a practical plan for the disposal of all waste water (currently estimated to be in the billions of gallons) that will be generated by hydraulic fracking of numerous horizontal gas wells, inclusive not only of fracking fluids, but the radioactive waste that will be generated by drilling and fracking of the Marcellus Shale (which itself is radioactive).
5. Expand the parameters for testing of water from gas well sites, as well as explicitly declare that all mandated water monitoring and testing costs be the financial responsibility of gas companies.
6. Declare that all expenses to county and local government to implement the SGEIS be the responsibility of gas companies.
7. Ban the use of water from aquifers for the purpose of hydraulic fracking of horizontal gas wells.
8. Fully disclose to the public the complete list of chemicals to be used in fracking fluids.
9. Ban the use of carcinogenic or suspected carcinogenic chemicals in fracking fluids, as well as chemicals in fracking fluids that act as endocrine disrupters or mutagens.
10. Develop and publish DEC's strategy to train and hire the many additional staff needed to enforce the SGEIS, as well as a description of penalties to empower the DEC to protect the public.

Resolved:

If the Northeast Organic Farming Association of New York does not believe that the final SGEIS is fully protective of New York State's agriculture, environment and people, NOFA-NY may join a lawsuit with other like minded organizations and individuals to force the Department of Environmental Conservation to create a fully protective and enforceable SGEIS.