

To: Edward Hanlon/DC/USEPA/US@EPA
Date: 04/07/2010 11:34 PM
Subject: EPA Comments re:hydrofracking study

Dear Mr. Hanlon,

I represent 235 members of Advocates for Springfield, a group of citizens in Springfield, NY, who are deeply concerned about protecting our rural environment and the quality of life in our town. Gas companies have already leased more than 10% of our town's land and that is just the beginning as they await official permission from NYS DEC to expand their drilling activities into hydraulic fracturing of horizontal wells.

We are very pleased to see that the EPA is about to commence a thorough study of the environmental impacts of hydraulic fracturing. We are also pleased to read many of the public comments from environmental groups that encourage you to conduct an expanded study. Many of our concerns with your proposed study have been recited in a comment letter from Catskill Mountain Keeper, and we will not repeat these points.

Our community has an agricultural base that is totally dependent upon access to clean water for our crops and animals. Nearby, contamination problems have surfaced in Dimmock, PA and other places where the solution appears to be to truck in bottled water for human consumption. This is NOT a solution for our crops and animals. And although it addresses the immediate human health risks, it fails to respond to the total loss of our real estate values (who will buy a home that can only use bottled water?) or to the longer term risks to our health from both contaminated water and other chemicals to which we might be exposed. Our point is to underline the extraordinarily high costs of one simple contamination, whether caused by human error, material failure, or hydrofracking. For a farmer whose family has worked land for his/her entire life, contamination from hydrofracking presents an unacceptably high and irremediable risk. We hope that as you design the EPA study, you will take into consideration the extreme penalty we will suffer if this activity proceeds and even one of our farms becomes worthless as a result.

The first mandate of traditional Haudenosaunee [Iroquois] chiefs is to ensure that their decision-making is guided by consideration of the welfare and well-being of the seventh generation to come. Our area was once home to these native Americans. By its nature, hydrofracking injects a mix of chemicals into the ground that might not resurface for 100 years. But that is when our great great grandchildren will be feeling the impact of drilling activity that is conducted today. We hope that your study considers that many of the risks of this drilling activity will not be observable during the study period.

As we follow the NYS DEC environmental evaluation of hydrofracking (that agency is preparing a Supplemental Generic Environmental Impact Statement), we note that cumulative impacts have not been given enough emphasis. This concerns us for two

reasons: 1) the increased statistical risk of contamination; and 2) the extraordinary alteration of our environment (not just our water but also our air, our roads, our land, our entire rural character). Please make sure that your study is expansive enough to address cumulative impacts.

While you conduct your study, you will be taking data from current industry activity. As non-scientists, we do not understand how studying a moving target can adjust for the target making its own adjustments simply in response to the study. We are highly suspicious of the drilling industry and suspect that there will be considerable under-reporting of incidents and quick reactions to hide or mitigate incidents. We are also concerned that current staffing levels of state enforcement agencies are inadequate to offset this concern. Your study will have to temper its conclusions accordingly: the absence of contamination evidence does not imply that the activity is safe (see comments from NYC).

Finally, your study will be conducted over several years. But drilling is occurring right now in PA, CO, TX, and soon, we fear, in NY. By the time your results are reported, the damage may already have been done. Does it not make sense to delay further drilling until your study is complete?

Thank you,

Harry Levine
President
Advocates for Springfield