

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

Date: 04/05/2010 08:37 AM

Subject: SAB Environmental Engineer Committee Hydraulic Fracturing Research Plan Review

Dear Mr Hanlon and the Committee:

I understand that the Committee is meeting April 7 and 8, 2010 To provide advice on EPA's Office of Research and Development proposed approach to be used to frame the hydraulic fracturing study design and the areas that will be addressed by research relevant to hydraulic fracturing.

I offer the following comments regarding hydrofracturing that must be taken into account in any such study:

Fully adequate environmental and community safeguards taking into account the cumulative impacts of this type of drilling, hydrofracturing and gas production. There must be a clear plan for fully assessing and mitigating the cumulative impacts of gas drilling and extraction on water, air, land use and values, forests, plants, animals, people and community character. The cumulative impacts where these activities have already occurred should be taken into account

A clear plan for the inclusion and collaboration of local government and communities as involved parties, in reviewing all aspects of gas drilling and production including location and density of all drilling pads and bores, central storage and support facilities, compressor stations, pipelines, etc. There should be formal notification to every municipality in which an application is made for a drilling permit, and should afford those municipalities the opportunity to be listed as an involved agency

A ban gas well drilling in floodplains

All drilling companies and related activities must adhere to all requirements of Federal Clean Water and Air Legislation

A complete ban on the use of any known toxic chemicals in fracking fluids

A clear plan with specified limitations and community safeguards for any and all water withdrawals that protects and prevents depletion of local water sources, public and private

A clear plan, requirements and gas company liability for handling, storing, tracking, transporting and processing all waste including any drilling and fracking fluid materials, and all toxic chemicals, gases, minerals and radiation produced or released in the process, with clear protocols for each

A clear plan and requirements for fully protecting all aquifers, public and private drinking water sources and required pre drilling and ongoing test well monitoring at each well site and

along all horizontal bores as well as pre and ongoing testing of any public or private water sources within one mile of well sites and bores.

Clearly specified gas company financial responsibility for all water source monitoring with Federal and or State responsibility to conduct all monitoring or oversee independent contracting of it

A clear plan and requirements for preventing any and all releases of toxic gases into the air including gas company responsibility for collecting and appropriately processing any and all gases produced during all phases drilling, hydrofracturing and ongoing production as well as clearly specified gas company financial responsibility for all air quality monitoring with Federal and or State responsibility to conduct all monitoring or oversee independent contracting of it

A clear plan for assessing and mitigating community impacts of all aspects of gas drilling and production

There must be a specific assessment of the impacts of related heavy truck and machinery traffic on local roads and bridges with pre drilling and ongoing assessments as well as clearly specified gas company liability for the costs of any and all needed repairs

There must be a specific assessment of the impacts and mitigation of all emissions of trucks and related drilling and production machinery

All accidents related to gas drilling and production need to be regulated with clearly specified liability and mitigation requirements.

The Federal and State Governments must promulgate accompanying regulations with appropriate rule making procedures covering all of the above, not simply suggested conditions. Any and all costs of implementing and monitoring these regulations and requirements must be borne by the gas companies. There must be a clear plan for adequate staffing and support for regulatory oversight and monitoring with gas company financial responsibility and bonding to ensure adequate oversight and monitoring over the lifetime of drilling, production, closure and ongoing monitoring.

No costs or unwanted responsibilities shall be passed to local government and communities.

Respectfully,

Stephen L Dungan