



Oral Statement of Nichole Saunders to the USEPA Science Advisory Board Hydraulic Fracturing Research Advisory Panel

February 1, 2016

Re: Assessment of the Potential Impacts of Hydraulic Fracturing for Oil and Gas on Drinking Water Resources

Members of the Advisory Board:

My name is Nichole Saunders and I represent the Environmental Defense Fund (EDF). Thank you for the opportunity to provide comments today.

I'd like to open by reiterating that EPA has developed a good report that will serve as a great resource and springboard for important future research. Yes, it can and should be improved in a number of ways, and a lot of additional research is clearly needed, but this one report should not be expected to definitively answer every question about the potential impacts of hydraulic fracturing activities.

With this in mind, EDF urges this Panel to finalize its review, prioritize key recommendations, and in turn encourage EPA to work swiftly to finalize this report in a timely fashion before its value is diminished. It is vital that we move forward from this initial review and begin to actively address the research needs and vulnerabilities highlighted in its pages.

At October's meeting in DC, EDF shared concern with many others – including many on this Panel – that EPA's statement that the Agency "did not find evidence of widespread, systemic impacts" does not fairly represent the full scope of the report, and overshadows key uncertainties, data gaps, limitations, and local impacts.

It is encouraging to see these concerns reflected in your draft review document, and EDF urges this Panel to retain, and even strengthen, this important criticism in their final response to EPA.

For our part, EDF believes the attention paid to this headline, rather than the almost 1,000 pages that followed it, is representative of the problem itself. We are missing the point. Impacts that aren't widespread or systemic are still impacts – even if they are outliers,

infrequent, rare, localized, or poorly understood. These impacts matter, and they should not be ignored.

No interests are served by translating years of work into a one sentence headline that does little to advance our understanding of today's operations and their potential impacts on the environment and communities. This summary language is not a scientific finding. It's an observation about a lack of evidence, and focuses – perhaps in error – on attempting to reach a uniform conclusion about a set of activities and impacts that are far from uniform.

There is, however, a simple solution – avoid this confusion by sending a clear and direct message that fairly represents the full scope of EPA's report and provides a path forward for future research.

This Panel is charged with ensuring that conclusions clearly, concisely, and accurately describe major findings consistently with the body of the report. To do that, it is EDF's opinion that a modified headline should represent these key takeaways:

- Hydraulic fracturing activities can have significant, localized impacts on the environment and communities;
- These impacts do not happen at every site, and do not happen all the time;
- But because impacts do occur, they must be acknowledged and addressed. At least 5 key vulnerabilities have been clearly identified in this review; and
- Further research is needed to fill the large number of data gaps, uncertainties, and limitations that hindered this analysis to allow for more robust conclusions in the future.

EDF appreciates the thorough and detailed review this Panel has put together on a number of important subjects beyond the scope of these comments. Your recommendations will undoubtedly strengthen EPA's final report. Thank you.