

From: Dave Cowan  
Sent: Wednesday, May 08, 2013 9:40 AM  
To: Hanlon, Edward  
Subject: Request to provide comments for consideration by SAB Hydraulic Fracturing Research Advisory Panel

The Federal Pipeline Safety Regulations require that combustible gases in certain pipelines be detectable either by a natural odor or by odorization at 1/5 the lower explosive limit by a person with a normal sense of smell.

Title 49 Part 192 of the Code of Federal Regulations (49 CFR Part 192 or Part 192) are the minimum federal safety standards which govern the transportation of gas by pipeline. Section 625 of Part 192 addresses the odorization of gas.

Since odorization of natural gas is required as a safety measure for natural gas distributed to domestic end users for the purpose of identifying leaks in pipes or appliances, why shouldn't appropriate odorizers be injected with fracking fluids?

If "a person with a normal sense of smell" were to detect the odorizer within his/her environment (a well or other domestic source of water), he/she would know immediately that the aquifer supplying his/her domestic water had been compromised and that the cause was do to oil or gas drilling or production. There would be no argument as to possible "natural" source of gas. This eliminates the need for expensive lab tests to determine cause. Once the odorizer has been detected, emergency procedures could be initiated to determine if continued use of the compromised aquifer might be a health hazard and the degree there of. After the health issues have been addressed then the source of the breach could be investigated and appropriate mitigation measures could be initiated.