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**ORAL STATEMENT OF JENNIFER PETERS ON BEHALF OF CLEAN WATER NETWORK
TO THE ENVIRONMENTAL PROTECTION AGENCY SCIENCE ADVISORY BOARD
ENVIRONMENTAL ENGINEERING COMMITTEE PANEL ON HYDRAULIC FRACTURING REVIEW**

April 7, 2010

My name is Jennifer Peters, Deputy Director of the Clean Water Network. The Clean Water Network (CWN) is the largest coalition of local, state and national non-profit public interest organizations working together to protect the health, safety and quality of our nation's waters. CWN's diverse membership represents farmers, hunters and anglers, garden clubs, surfers, boaters, environmentalists, faith communities, labor organizations, smart growth planners, consumer advocates and civic associations. We appreciate this opportunity to comment on this important study.

CWN supports the EPA undertaking a *comprehensive* scientific study to examine hydraulic fracturing and its relationship to drinking water resources. Numerous cases of chemical spills and contamination of ground and surface waters have been reported in communities where hydraulic fracturing is already occurring. Access to clean and safe drinking water is paramount to all aspects of our lives. Congress acknowledged this in its directive to the EPA to study the impacts to drinking water from hydraulic fracturing. It is imperative for the EPA to conduct a transparent and independent assessment of hydraulic fracturing's impacts to drinking water.

CWN believes that a comprehensive study must involve:

1. **On-the-ground data collection and monitoring** to assess potential risks to water resources at every stage of natural gas development – from well pad siting and construction to the final disposal of wastewater and site closure.

2. **Considerations of the potential risks of subsurface fluid movement** long after gas production – even decades later. Seismic activity or the degradation of the well casings could result in the migration of fracturing chemicals that remain underground after production.
3. **Reliable information on the chemical additives used in fracturing fluids.** While the exact chemical composition of fracturing fluids is mostly unknown, the potential toxicity and hazardous nature of these additives is widely recognized. This critical information is essential for the EPA to adequately evaluate potential risks hydraulic fracturing poses on drinking water resources.

We support the three major research categories outlined in the scoping materials and the proposed potential elements of research study, particularly chemical characterization and monitoring and field studies. The field study steps identified in the scoping materials are critical to a comprehensive and independent assessment of water resources impacts. CWN believes that the EPA should focus its resources on collecting field data and maximizing its resources by working with current on-the-ground studies already being conducted in states like Colorado and Wyoming. Guiding these efforts will give the EPA access to a larger pool of data and allow the agency to sample a broader range of areas. CWN also believes that the study must determine the chemical composition of all hydraulic fracturing waste fluids. The waste fluids generated from hydraulic fracturing are generally stored in open pits and have the potential to leak, overflow and spill – all of these actions can cause harm to water resources. There is limited data available on the precise composition of the chemicals used for fracturing, because it is considered proprietary. Withholding this information from the public and from regulatory agencies undermines the public's ability to protect itself from harmful discharges.

CWN asks the EPA to address the following additional issues and questions:

- 1) Cumulative impacts to surface and ground water resources. This should include, but is not limited to: multi-well pad siting; drilling in multiple formations; active drilling; and gas extraction. These impacts should be assessed on not only a single pad basis, but also for well-pads in the same watershed or geographic area.
- 2) Water quality and quantity impacts should be assessed within the context of local hydrology, geology and shale formations and existing uses.
- 3) Impacts to water quality and quantity compounded by climate change.

- 4) How will the study address changes to non-static environments like shale formations and aquifers?
- 5) The study should assess how disposal of waste fluids and the associated opportunities for contamination vary throughout the country. Are there common regulations that prevent contamination from waste fluid disposal?
- 6) EPA should analyze risks to source water, recognizing existing potential for contamination documented in communities' Source Water Assessment Plans (SWAP), while identifying additional risks for communities with Filtration Avoidance Determinations.

CWN commends the EPA for acknowledging the importance of stakeholder involvement in this process. Our organizations strongly encourage the EPA to provide ample time in the future to solicit meaningful public input and stakeholder involvement. Again, thank you for the opportunity to comment today.

Respectfully Submitted,

Jennifer Peters
Deputy Director
Clean Water Network