



February 28, 2011

By Electronic (hanlon.edward@epa.gov) and First Class Mail

Mr. Edward Hanlon
Designated Federal Officer EPA Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Draft Plan to Study the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources

Dear Mr. Hanlon:

We would like to take this opportunity to comment on the Draft Plan to Study the Potential Impacts of Hydraulic Fracturing on Drinking Water Resources (“Draft Plan.”) The New York Public Interest Research Group (NYPIRG) is New York State's oldest and largest environmental, consumer advocacy and good government organization and has long been active in water quality protection. NYPIRG is also a signatory to the landmark 1997 New York City Watershed Memorandum of Agreement (MOA) and has long been active in protecting the New York City Watershed.

The interest in the natural gas reserves in the Marcellus Shale and otherwise hard to access gas plays using high-volume, horizontal hydraulic fracturing (“hydrofracking”) is intense and the willingness of some to proceed without the benefit of sound science, is troubling.

We commend EPA for conducting this study and its commitment to use a lifecycle analysis approach in order to measure the wide range of potential adverse impacts that hydrofracking may have on water quality and public health. We trust that the Science Advisory Board (SAB) will comply with its stated commitment to use the best available science, use independent sources of information, and have a transparent, peer-reviewed process.

We offer the following comments on the Draft Plan:

First, the Draft Plan should broaden the number of case studies throughout the Marcellus Shale region to gain a better understanding of impacts to groundwater and surface water bodies. Given the series of contamination incidents that have occurred, the potential devastating consequences and the divergent terrain of the broad geographic area, an increase in the number of case studies is warranted.

Second, the Draft Plan must fully evaluate all of the potential impacts to water supplies from hydrofracking, including but not limited to water and chemical usage in hydrofracking fluids; risks associated with storage and transport of chemicals; the potential for surface spills and leaks; risks associated with casing and cementing well bores; all risks associated with hydrofracking not just those occurring during pressurized fracturing operations; impacts on groundwater and surface water consumption; pre- and post-monitoring of groundwater; risks associated with seasonal weather patterns; wastewater generation, treatment and disposal; land disturbance and the addition of impervious surfaces, and stormwater runoff.

Third, while the reasearch approach will include a combination of case studies, laboratory analysis and field work, the much-needed field studies should be conducted in known or suspected contaminated sites across a broad geographic area.

Finally, the cumulative impacts to groundwater and drinking water surface water supplies from hydrofracking must be fully examined. Specifically, EPA's proposed research approach must consider reasonably related long-term, short-term, direct, indirect and cumulative impacts, including other simultaneous or subsequent actions, which are: (i) included in any long-range plan of which the action under consideration is a part; (ii) likely to be undertaken as a result thereof; or (iii) dependent thereon.

In conclusion, given the significance of the impacts to the environment from the intense industrial activity that is gas drilling, we trust that EPA will ensure that science will dictate the study's conclusion.

Thank you for this opportunity to comment.

Sincerely,

Cathleen Breen
Watershed Protection Coordinator
NYPIRG