



**LEAGUE OF WOMEN VOTERS®
OF PENNSYLVANIA**

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Public Comments by President of LWV of Pennsylvania

EPA, EPA Science Advisory Board and SAB Hydraulic Fracturing Advisory Panel
Study of the Potential Impact of Hydraulic Fracturing on Drinking Water Resources
Hydraulic Fracturing Advisory Panel Teleconference
November 20, 2013

I am Susan Carty, President of the LWV of PA, speaking on behalf of the PA League. The League of Women Voters has a strong commitment to protecting our environment based on research, getting input from different perspectives and reaching consensus positions. These positions lead to advocacy, an important part of League work on the national, state and local level.¹ The League believes that natural resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health.² Because of this longstanding commitment to protecting the environment, the League of Women Voters of Pennsylvania stands with the League of Women Voters of the United States in support of additional study and exploration on the impact of hydraulic fracturing across the country.

A review of the *EPA December 2012 Progress Report* which sets the course for the duration of the study omits some critical subjects that are needed to adequately address the mission and congressional intent of this study. We are concerned that the following areas will not be included in the Final EPA Report:

1. There will be no data on the two “prospective natural gas well study sites,” which haven’t even been selected yet.
2. Data on Dimock, which was dropped as an official study site in 2012 and only mentioned in a Progress Report footnote (page 143) will not be included.³
3. No major blowout or spill will be included in the study of Leaks and Spills (there were 3 in PA alone in 2010 and 2011) including one in Bradford County, which is an EPA Study site, with the Susquehanna River Basin being one of two river system sites. There, that blowout resulted in extensive contamination and a fine of almost one million dollars by the Pennsylvania Department of Environmental Protection (CDC Health Consultation).⁴

4. Deep injection wells are not being considered in this study.
5. A review of bromide and disinfectant based halomethane prevalence is not included in the study nor is the prevalence of contaminated water wells being considered.
8. Proprietary chemicals are not required to be included on FracFocus, where much of the study information is gathered from industry reported data.
9. Existing, peer reviewed studies by the EPA, USGS, CDC and other government agencies will not be considered and none of that data will be included in the Final EPA Report.

In addition, there is great reliance on “literature review,” but at the time the Advisory Panel met last May to discuss the Progress Report, Panel members had not been given the chance to review these studies, reports and other written materials. The League hopes that for the sake of transparency, not only the Advisory Panel, but the public will have access to all literature that is being considered and that may inform the Final EPA Report.

In summary, the League of Pennsylvania hopes that these limitations of the EPA Study will be addressed as soon as possible and that the Final Report not be issued before that happens and at the earliest at the end of 2016. Policy makers in our own country and abroad are watching this EPA study since many critical decisions will be based on your findings. There are many vital unanswered questions and the EPA December 2012 Progress Report suggests that they will not be answered by this study. Please look at the direction of the study, compare it to where it was heading in late 2010 and make necessary course corrections where needed. We simply can't afford to get this wrong!

Thank you for the opportunity to provide input.

Susan Carty, President
League of Women Voters of PA

i LWV US natural resources position found at <http://www.lwv.org/content/natural-resources>. LWV US position on water resources relative to environmental protection and pollution control found at <http://www.lwv.org/content/environmental-protection-and-pollution-control>.
iiiii Hydraulic fracturing is a type of unconventional natural gas extraction process that ranges from water acquisition to wastewater treatment and waste disposal. The use of this term and others will be consistent with those found at the EPA website <http://www2.epa.gov/hfstudy/hydraulic-fracturing-water-cycle>.
iii Information from public sources will be provided to assist you in this effort, if requested

2. <http://www.lwv.org/content/natural-resources>

3. <http://yosemite.epa.gov/sab/sabproduct.nsf/a84bfee16cc358ad85256ccd006b0b4b/928483abb4f2a13285257b02004ab250!OpenDocument&Date=2013-05-07>

4. CDC Health Consultation, (gas company name) ATGAS 2H Well Site, LeRoy Township, Bradford County, PA November 4, 2011