



Ground Water Protection Council

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Dedicated to protecting our nation's ground water.

March 26, 2010

Mr. Edward Hanlon
Designated Federal Officer
EPA Science Advisory Board (1400F)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Dear Mr. Hanlon:

The Ground Water Protection Council is pleased to provide its comments regarding the document entitled "Scoping Materials for Initial Design of EPA Research Study on Potential Relationships Between Hydraulic Fracturing and Drinking Water Resources", March 2010.

For more than a decade, the GWPC has been actively involved in the water protection and water use issues related to the practice of hydraulic fracturing. During this time we have conducted numerous surveys and studies of our own on this topic.

Our members consist of the state regulatory agencies with direct authority over most aspects of the hydraulic fracturing process. The states bring a long history of practical experience concerning the processes, procedures, risks and technologies associated with this well stimulation practice. We support the efforts of the EPA to study the practice of hydraulic fracturing as it relates to the prevention of water contamination. We also believe it is critical for EPA to involve state regulatory agencies as full partners in the study process. As the association of state agencies, GWPC stands ready to provide its assistance to insure the knowledge and expertise of our state regulatory members is proffered, where appropriate, to insure the study incorporates their decades of invaluable technical and regulatory experience.

With regard to the proposed scope of the study we have concerns about the breadth of the effort. The scoping document appears to cover areas of oil and gas exploration and production activity that are essentially unrelated to the practice of hydraulic fracturing such as site exploration, selection and development, and gas production (infrastructure of storage and transportation). Consequently, we believe narrowing the scope of the study to field practices directly related to hydraulic fracturing would result in a more focused and, ultimately, more effective study.

The GWPC also strongly urges EPA to include professional geologists and engineers with field experience in the processes associated with hydraulic fracturing on any working groups established for the study.

As always, GWPC and its member states will continue to work with EPA to ensure the protection of our nation's water resources. Thank you for considering these comments.

Respectfully,

Mike Paque
GWPC Executive Director