

From: Laurie Roe

To: Edward Hanlon/DC/USEPA/US@EPA

Date: 02/27/2011 08:39 PM

Subject: comment on EPA draft of impact of hydraulic fracturing on drinking water

Dear Mr. Hanlon,

Thank you for considering my comments on this study. I appreciate the chance to reflect to you two years of reading widely on this topic. I live in an area of NY slated (bad pun) for Marcellus and Utica shale gas industrial development.

I am pleased that this EPA study decided to consider the full life cycle of this industry and not just the specific technology of fracturing shales with explosives and extremely high pressure toxic liquid. Impacts on drinking water are guaranteed to come from the creation of, transport, mixing, and use of the chemicals of fracturing processes.

These are some of my concerns in looking over the EPA draft plan to study the impact on drinking water of slickwater high volume hydraulic fracturing to access methane.

I want to be reassured that unlike the 2004 EPA study on hydraulic fracturing that has become infamous for industry distortion, this study is not ultimately created to assist fossil energy companies in creating laws to forward their agenda. Unless something in this study specifically addresses how this study is different from the 2004 study it will not carry much weight with the interested public. Complete transparency and endorsement as unbiased by political and industry pressure by all participating in the study seems requisite.

It is imperative to me that this study considers the cumulative impact and risks of the hundreds of thousands of wells that the industry is hoping to drill and maintain for decades.

It is imperative to me that this industry be studied in real life terms, not best practice and as if regulations were going to be followed. I want to see the actual practice records of companies involved in this industry. Regulations are not always followed and there are not adequate inspection and enforcement personnel to help create an atmosphere of caution. I understand you are going to be looking at some actual locations where drilling has happened but I would like to see that you look at incidents of violations of regulations from the whole country. This broad scope would seem to provide the most complete data and resultant picture of the reality of the industrial culture and practices.

I read over and over again that the cementing jobs in sealing off the wells are a huge problem. The cement fails over time for many reasons. I believe this is an area that needs intense scrutiny. I want to see the risk statistics for cement failure from engineering perspective and also looking at what has already happened in this industry. These shale gas wells are proposed to be refracked up to perhaps a dozen times. What does this do to original cementing jobs, how do you propose to study this?

I would like to know the impacts of air pollution on groundwater. There could be a huge increase in diesel exhaust from trucks and compressor engines, with the resultant soot eventually getting on the ground and into the ground water. I do not see mention of this as a likely huge cumulative impact on ground and ultimately drinking water of this industrialization.

I would like to know the risk analysis of hundreds or thousands of abandoned and unknown perhaps unplugged old gas and oil wells such as are known to exist in New York State. The pressures involved in this technology are likely to affect these wells and result in incidents that will create water pollution.

I would like a risk analysis of road maintenance and failure leading to accidents with trucks carrying chemicals causing water pollution.

I would like a risk analysis of using landfills with plastic liners to contain drilling cuttings full of radioactive toxic industrial waste that could readily leach out or spill out into water that will get into drinking water supplies.

I would like a risk analysis of failure of public water treatment plants, (used for sewage treatment), being incapacitated by heavy metals and chemicals from wastefluid from this industry and the resultant damage to drinking water from this issue.

I would like an analysis of risk to any unfiltered drinking water source such as private water wells. Many rural people have such a water source. In NY the DEC has said that due to the unfiltered nature of the NYC water supply, its water source watershed effectively is protected by a defacto ban on this industry. I would like to see research to consider how many people have private drinking wells and what the socioeconomic considerations are in not giving these unfiltered water sources the same protection as NYC.

Thank you, Laurie Roe, citizen of NY

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Alice

It was much pleasanter at home, when one wasn't always growing larger and smaller, and being ordered about by mice and rabbits.