



2211 Norfolk Street, Suite 614
Houston, Texas 77098
P 713 337 8800
F 866 273 8998
www.consumerenergyalliance.org

May 6, 2010

Mr. Edward Hanlon
Designated Federal Officer
EPA Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: EPA's Proposed Research Approach for Studying the Potential Relationship Between Hydraulic Fracturing and Drinking Water Resources

Dear Mr. Hanlon:

Consumer Energy Alliance (CEA) appreciates the opportunity to submit comments to the Science Advisory Board on the scope of the EPA study to examine the relationship between hydraulic fracturing and drinking water.

Consumer Energy Alliance is a nonprofit, nonpartisan organization whose mission is to expand the dialogue between the energy and consuming sectors to improve overall understanding of energy security and the thoughtful development and utilization of energy resources to help create sound energy policy and maintain stable energy prices for consumers. CEA is made up of more than 280,000 grassroots and 142 affiliate members including oil and natural gas producers and natural gas consumers such as agricultural organizations, fertilizer producers, manufacturing, transportation, utilities, petrochemical companies, iron and steel producers and other major end-users of natural gas.

Recent advancements in hydraulic fracturing have greatly expanded the U.S. domestic natural gas production capabilities and recent studies indicate that the United States has larger, undeveloped supplies of natural gas than previously anticipated. The combination of these two factors is welcome news as responsible development of natural gas and oil resources is essential to U.S. energy security, maintaining U.S. economic competitiveness, and creating stable and high-paying jobs needed as we continue to emerge from the recent financial crisis.

Natural gas is a fundamental resource as a feedstock for manufacturing, chemical and fertilizer production and important energy source for both manufacturing and electricity generation. Further, CEA considers clean-burning and abundant natural gas an important bridge fuel needed as our society and economy transitions from traditional conventional fuels to the alternative fuels of the future. The ability to recover these unconventional natural gas supplies will depend as much on public acceptance and a positive political environment as continued technological development.

As such, it is essential that the public and policy-makers are provided with information based on a well-designed and executed study that demystifies and corrects pre-conceived notions about hydraulic fracturing.



2211 Norfolk Street, Suite 614
Houston, Texas 77098
P 713 337 8800
F 866 273 8998
www.consumerenergyalliance.org

CEA welcomes the role that the Science Advisory Board (SAB) can play in ensuring that a study examining the relationship with hydraulic fracturing and drinking water is provided an objective assessment that takes in account the impacts of current state regulatory programs covering hydraulic fracturing.

CEA offers the following comments about the scope and design of the study:

- CEA believes it is important for this study to benefit from participation and expertise from industry experts with extensive experience in hydraulic fracturing best practices.
- This study should be based on the principles of sound science and include valid and accurate data from independent, credible sources.
- CEA supports the announced objective of using a transparent and peer-reviewed process and also suggests EPA include the participation of the state regulatory agencies, the Interstate Oil and Gas Compact Commission and the Groundwater Protection Council. State-level regulatory officials that have been involved in developing and implementing hydraulic fracturing regulations for decades can bring invaluable counsel and expertise to the EPA study.
- At the April 7-8, 2010 public meeting, a number of speakers advocated that the study take a broad approach with some supporting a full life-cycle analysis of hydraulic fracturing. We believe that the study should focus on the Congressional intent for EPA to carry out “...a study on the relationship between hydraulic fracturing and drinking water....” While CEA does not disagree that a broader range of environmental issues deserves evaluation, the \$1.9 million that has been appropriated to conduct the study is inadequate for a thorough analysis of such an expansive approach.

Again, Consumer Energy Alliance welcomes the opportunity to provide comment to the EPA for this important study. CEA members look to this report to provide the information and data necessary for sound decision-making both by the EPA and Congress on actual risks and issues associated with hydraulic fracturing and ultimate development of this important natural resource.

CEA offers itself as a resource to the EPA on development of this report and are available to provide more details on our specific views as appropriate.

Please feel free to contact me at abrowning@consumerenergyalliance.org or (312) 234-9640 if you have any questions of would like further information from CEA.

Sincerely,

Andrew Browning
Vice President