July 8, 2010

By FedEx and Email (hydraulic.fracturing@epa.gov)

Ms. Jill Dean
Office of Ground Water and Drinking Water
U.S. Environmental Protection Agency Headquarters
1200 Pennsylvania Avenue, NW
MC 4606M
Washington, DC 20460

Re: **Comments of America's Natural Gas Alliance**
Proposed EPA Study of Hydraulic Fracturing and Drinking Water

Dear Ms. Dean:

America's Natural Gas Alliance (ANGA) appreciates this opportunity to comment on the proposed plan of the Environmental Protection Agency (EPA), in response to a recommendation from Congress, to study the potential relationship between hydraulic fracturing and drinking water. ANGA applauds EPA for its announced intent to carry out the study in a peer reviewed, transparent manner. ANGA offers these preliminary comments in connection with the Agency's efforts to set an appropriate scope for its study.

ANGA is an educational and advocacy organization dedicated to increasing appreciation for the environmental, economic, and national security benefits of North American natural gas. ANGA's members include many leading, North American independent natural gas exploration and production companies. Their collective natural gas output of approximately nine trillion cubic feet per year comprises more than 40 percent of the total annual U.S. natural gas supply.

As acknowledged by EPA's March 2010 proposed drinking water study scoping materials, the safe and environmentally responsible development of our Nation's vast domestic supplies of natural gas has been and, increasingly, will be, an important component of America's energy security, economic and environmental health. Applying hydraulic fracturing, which has been used safely at more than 1,000,000 wells over the past 60 years, to develop shale-based natural gas resources has materially increased the available domestic natural gas supply. Natural gas is a clean, efficient, and cost-effective fuel that offers the potential both for significantly decreasing greenhouse gas emissions, and promoting America's energy independence. In 2008, natural gas contributed $385 billion to our nation's economy and supported more than 2.8 million jobs.

Hydraulic fracturing plays a central role in safe and efficient development of our natural gas supplies. Fracturing technology has been used safely for more than six decades. The states, which for all those years have hosted natural gas development facilities, today regulate various aspects of hydraulic fracturing activities as a means of sustaining that positive record.

History demonstrates that hydraulic fracturing can generate abundant, secure energy supplies, without adverse consequences to drinking water. ANGA supports EPA's effort to design an objective and scientifically valid study to confirm what its members long have observed in practice—that hydraulic fracturing as a method for developing natural gas is conducted in a safe and environmentally responsible manner.

Based on its review of EPA's March 2010 initial study design scoping materials, and the June 24, 2010 report on those materials by the EPA Science Advisory Board (SAB), ANGA offers the following comments.

Proposed Study Objective

- This study will address issues of broad public interest and of significance for our economy and energy security. ANGA encourages EPA to align the scope of its study with the recommendation of Congress, which sought a study on "the relationship between hydraulic fracturing and drinking water." ANGA supports those portions of the scoping materials aligned with Congress' request, and strongly urges paring those that are not so aligned.

- The SAB recommendation that EPA also study, in the longer term, influences on water resources and aquatic ecosystems, and their ability to support recreational and other uses, would stray from Congress' intent to develop and disseminate data that will inform policy decisions relating to drinking water protection.

- For the same reasons, ANGA supports SAB's recommendations that EPA focus on studying drinking water concerns specific to hydraulic fracturing.

Proposed Research Categories; Prioritizing Research Needs

- Characterization of the Hydraulic Fracturing Lifecycle. In general, ANGA supports EPA's proposal to refine its research questions to consider the lifecycle of a hydraulically fractured well. ANGA agrees with SAB's recommendation that a formal life-cycle assessment is not necessary. Hydraulic fracturing has been used widely for decades. Experience with use over decades will allows the Agency to determine both the lifecycle stages and the engineering and environmental practices that may present the prospect of consequences for drinking water. ANGA stands ready to assist in gathering and contributing information that may be available from its member companies.

- Potential Relationship to Drinking Water Resources. The core objective of the proposed study should be to resolve questions in this research category. When framing the scope of those questions, EPA should consider the need to deliver information within one to three years, in order to support timely, empirically supported decision-making. ANGA agrees with SAB's general recommendation that EPA survey available data and knowledge before commencing additional field studies. After that review, EPA should assess whether there are significant gaps that require the development of additional data and information; if such gaps are present, the Agency should determine how best to fill those gaps, whether through field studies or otherwise.

Stakeholder Process

- ANGA endorses SAB's recommendation that EPA form a collaborative advisory group, composed of key stakeholders reflecting a broad and balanced range of perspectives that will be engaged throughout the research process. Such an arrangement should be devised to allow stakeholders to provide relevant, meaningful and timely input throughout the study. ANGA is prepared to coordinate with EPA and to identify appropriate industry representatives for those advisory groups.

- ANGA understands that EPA intends to design a public data collection process. At the outset of that process, EPA must determine the scope of the process, based on the universe of data needed to undertake the study. EPA should also describe its data requests and QA/QC criteria in detail, to guide stakeholders wishing to contribute. ANGA is prepared to assist in collecting relevant information that may be available from its members.

- ANGA applauds the commitment to meaningful stakeholder input and communication that EPA proposed in its March 2010 scoping materials. ANGA respectfully requests that EPA promptly publish more specific information about the opportunities for that input. The input points described in the scoping materials, understandably, are generic. It is unclear, for example, when stakeholders next would have an opportunity for input, following the scheduled July and August informational meetings. ANGA recommends that public meetings occur, at a minimum, on the following schedule: after EPA has issued a draft study design; after the literature review and public information collection phases of the study, but before EPA decides on the locations and scope of its field work; before EPA begins a formal health and environmental risk assessment; and after EPA has formulated preliminary findings.

- ANGA requests that EPA provide more information about how it intends to select the participants in the technical workshops and peer review panel, scheduled for October-November 2010. As SAB noted, industry possesses a wealth of data and experience that can be leveraged at all phases of the study, including study design. ANGA is prepared to assist in identifying qualified individuals to serve on EPA's various study panels.

ANGA is prepared to expand on or further explain these comments, should EPA so desire. ANGA may submit further comments, as the proposed study advances.

Sincerely,

Regina Hopper
President and CEO