

Singh, Angela K (DOA)

From: Colombie, Jody J (DOA)
Sent: Thursday, March 21, 2013 11:14 AM
To: Seamount, Dan T (DOA); Norman, John K (DOA); Foerster, Catherine P (DOA); Ballantine, Tab A (LAW); Wallace, Chris D (DOA)
Cc: Singh, Angela K (DOA)
Subject: FW: AOGCC Public Comment
Attachments: Verna_AOGCCPublicComment.docx

All- FYI

Angela - Please electronically and paper file.

Jody

-----Original Message-----

From: Danielle Verna [<mailto:dverna@alaskapacific.edu>]

Sent: Wednesday, March 20, 2013 3:16 PM

To: Colombie, Jody J (DOA)

Subject: AOGCC Public Comment

Hi Jody,

Attached is my public comment regarding the proposed changes to the regulations for hydraulic fracturing in Alaska.

Thank you,

Danielle Verna

March 15, 2013

Ms. Cathy P. Foerster
Chair, Commissioner
Alaska Oil and Gas Conservation Commission
333 West 7th Avenue
Anchorage, AK 99501

Re: Notice of Proposed Changes and Addition to the Regulations of the AOGCC regarding hydraulic fracturing

Dear Ms. Foerster,

I am a graduate student in the Environmental Science program at Alaska Pacific University. My first reaction to hydraulic fracturing ('fracking') in Alaska is a negative one. There is ample anecdotal and scientific evidence supplied by numerous states in the continental United States (Pennsylvania, Colorado, etc.) of the negative consequences to people and the environment as a result of fracking. Nevertheless, if fracking is to continue in Alaska it should be meticulously controlled. The proposed regulatory changes by AOGCC are a step in that direction. However I believe the new regulations within 20 AAC 25.283 do not go far enough, in that they allow for a Freshwater Aquifer Exemption and only require notification within one-quarter mile of the wellbore trajectory.

The criteria for granting a freshwater aquifer exemption per 20 AAC 25.440 are short-sighted when it comes to fracking wells. An aquifer that is not currently a source of drinking water could become a source in the future, despite it currently being 'economically or technologically impractical.' Also, regardless of the current natural 'contamination' level as it relates to standards for drinking water, there is no reason to allow for further anthropogenic contamination. Applying for an exemption may seem practical, particularly in Alaska where our oil and gas fields tend to be very remotely located, but in the long run only serves to further pollute our environment. There is no guarantee as to how an aquifer may shift, change or even be used over the coming decades, and it would be a shame to knowingly pollute what would otherwise be a natural environment (besides, of course, the well itself). In addition, the demand for water is growing in the United States and globally. Restricting fracking wells from contaminating any freshwater aquifer is one way to ensure Alaska doesn't face the same problem in coming years – there is no predicting how our future needs will empower the development of technology to obtain things we don't currently deem possible.

I support the requirement that operators must disclose the amount and type of material used during fracking operations and the attention brought to the requirements for disclosure at <http://fracfocus.org>. But perhaps disclosure is not enough. Alaska also needs strict standards on which chemicals and fluids will be permitted and their potential short-term and long-term effects should unwanted contamination occur. Alaska has an opportunity to learn from the misfortunes of those states that were not prepared with adequate controls to protect their residents and their water. Forward-thinking regulations now will provide a safer and cleaner environment for future Alaskans.

Thank you for your time.
Sincerely,

Danielle Verna
18336 Jamie Drive
Eagle River, AK 99577
dverna@alaskapacific.edu