

Singh, Angela K (DOA)

From: Colombie, Jody J (DOA)
Sent: Tuesday, April 02, 2013 8:39 AM
To: Singh, Angela K (DOA)
Subject: FW: hydraulic fracturing regulations
Attachments: AOGCC Ragland comments.pdf

From: Hannah Ragland [<mailto:hbragland@hotmail.com>]
Sent: Monday, April 01, 2013 4:26 PM
To: Colombie, Jody J (DOA)
Subject: hydraulic fracturing regulations

Jody-
Attached are my comments on the proposed AOGCC hydraulic fracturing regulations. I also faxed them, but wanted to email as a back-up. Thank you for the opportunity to comment, and please note my support for the Denali Citizens Council (DCC) comments, and the joint comments submitted by DCC, the Wilderness Society and other public interest groups.
Hannah Ragland

Attn: Cathy Foerster
CC: Jody Columbie

Alaska Oil and Gas Conservation Commission
333 West 7th Avenue, Suite 100
Anchorage, AK 99501

Dear Ms. Foerster-

Thank you for the opportunity to comment on the proposed regulations on hydraulic fracturing. I am commenting on behalf of myself and my husband, Jamison Milliken, although I would like to clearly state that we also fully support the comments submitted on behalf of the Denali Citizens Council (DCC), and jointly between the Wilderness Society, DCC, and other conservation and public interest groups.

We live in the Panguingue Subdivision, a rural residential area outside Healy, AK. Our home is located within the Healy Basin Gas Exploration License Area (which would involve hydraulic fracturing operations), and our interest in these proposed regulations is directly related to the potential environmental contamination and associated human health threats that have been shown to be associated with hydraulic fracturing. Contaminated drinking water supplies brings an enormous burden to local citizens, and could include enormous economic costs related to health expenses and costs associated with having to import drinking water from further outside the area. In addition to our personal concerns about potential economic costs to us, and our health and well-being, we are concerned with the potential impacts to the health of the natural environment here in this area. The Denali Borough receives a great majority of its income from tourism-related industries (through an accommodations tax), and is thus dependent on the environmental quality of the region. Specific to my community, the Stampede Road provides an increasing number of tourism opportunities year-round, largely because of the scenic vistas and pristine environmental conditions.

First of all, drinking water should be broadly defined to include any sources currently used or that could potentially be used, for drinking water. Our cabin, like many properties in our community, and in surrounding communities, is dry. We do not have a private well, but instead rely on community wells for our water supply. We have a number of friends who use freshwater springs also (as is the case for many Alaskans). Because not all of these drinking water sources are clearly identifiable as drinking water sources, we are concerned that the proposed regulations would not provide adequate notification for individuals who use these sources of water that are unconventional or not located at their home. For example, my home is more than ¼ mile away from the well that I use most frequently (closer to 2 miles), and I sometimes get water from a well 7 miles away, closer to where I work. Allowing for full disclosure of the permit application and draft permit documents to ALL citizens would ensure that all local residents who utilize these

drinking water supplies would be adequately informed about the potential impacts to water quality, no matter how far they live from the well.

Also, we ask that AOGCC require full disclosure of all materials that could be injected PRIOR to hydraulic fracturing in order to ensure that residents like ourselves can have access to the information, whether or not our home is within the ¼ mile included in these regulations. In order to adequately assess contamination of drinking water supplies, testing of water quality is essential. As has been shown in numerous cases, the burden of proving that contamination of drinking water has come from hydraulic fracturing operations often lands on the backs of private citizens. While we feel that it is incredibly unfair to put that burden on citizens, we also recognize that pre- and post-water quality testing is necessary to provide evidence that fracturing operations are indeed the cause of water contamination. To be able to adequately test water for the appropriate chemicals, a full disclosure of the materials (including liquids and solids) is critical BEFORE fracturing occurs, with at least a 30 day window before fracturing operations are to begin. The joint comments submitted by the Wilderness Society, DCC and other groups do a good job of detailing how the state could ensure that information gets to the public. It seems to defy the intent of passing any regulations on this, if the operator (or the state) can simply withhold the information as confidential for up to 2 years after operations have occurred (which can sometimes be the case with the forms that would be submitted under these new regulations). Please clarify that prior disclosure is required, and cannot be withheld as confidential.

We hope that AOGCC does not back away from the proposed regulations on hydraulic fracturing, and instead that it strengthens the regulations to make them even stronger. To adequately protect drinking water and regulate waste disposal, these regulations are critical.

I encourage AOGCC to pass these regulations in a timely manner, and request that if they are weakened that they return to the public for comment. Thanks for your consideration of my comments.

Hannah Ragland
hbragland@hotmail.com
907-687-2403