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AOGCC

The Wilderness Society, *et al.* Comments on  
Proposed Changes to AOGCC Regulations on  
Hydraulic Fracturing

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Lead Organizations Developing the  
Comments

- The Wilderness Society (Anchorage, AK)
- Earthjustice (Anchorage, AK)
- Natural Resources Defense Council (Washington, DC)
- Clean Air Task Force (Boston, MA)

## Other Organizations Supporting the Comments

- Alaska Center for the Environment (Anchorage, AK)
- Alaska Wilderness League (Washington, DC)
- Alaska's Big Village Network (Anchorage, AK)
- Audubon Alaska (Anchorage, AK)
- Center for Water Advocacy (Seward, AK)
- Cook Inletkeeper (Homer, AK)
- Denali Citizens Council (Denali Park, AK)
- Earthworks' Oil and Gas Accountability Project (Durango, CO)
- National Parks Conservation Association (Anchorage, AK)
- Northern Alaska Environmental Center (Fairbanks, AK)
- Resisting Environmental Destruction on Indigenous Lands (Palmer, AK)

## Primary Topics

1. Full disclosure of fracturing chemicals/concentrations
2. Notification of landowners, residents, and local/tribal governments
3. Testing of water within 90 days before/after fracturing
4. Required use of non-toxic drilling fluids and muds
5. Strengthening well integrity regulations
6. Minimizing flaring and venting
7. Working with ADEC and ADNR on storage, handling, and disposal issues
8. Expanding AOGCC staff to maintain adequate oversight

## Right to Know

- Disclose chemicals/concentrations of fracturing chemicals to the public before operations begin
  - Allows baseline water quality testing in non-permafrost areas
  - Helps protect the public, emergency responders, workers
  - Increases public confidence in fracturing operations
- Disclose base fluid, its source, and its non-water components, in addition to additives
- Do not rely on FracFocus alone for disclosure. Its problems include:
  - Needs additional fields, e.g., for base fluid source locations
  - Can't aggregate data through FracFocus
  - Limited re-publication of data
  - Data are post-fracturing

## Flaring/Venting of Associated Gas

- Need for more specific AOGCC regulations
  - Over 1/3 of natural gas in ND is flared
- Limit flaring and venting to the smallest amount needed for safety
  - Utilize the gas
  - Inject the gas
  - Separate out the condensable liquids
  - AOGCC develops flaring limitations
- Carefully controlled flaring is environmentally-preferred over venting as it reduces hazardous air pollutants, volatile organic compounds, and greenhouse gas emissions
  - AOGCC develops venting limitations