

Singh, Angela K (DOA)

From: Colombie, Jody J (DOA)
Sent: Wednesday, April 17, 2013 8:15 AM
To: Singh, Angela K (DOA)
Subject: FW: AOGCC - Regulation of Hydraulic Fracturing Operations
Attachments: AK Oil and Gas Commission Fracking Rules ACC Comments April 2013.pdf

Please process

From: Shestek, Tim [mailto:Tim_Shestek@americanchemistry.com]
Sent: Tuesday, April 16, 2013 7:18 AM
To: Colombie, Jody J (DOA)
Subject: AOGCC - Regulation of Hydraulic Fracturing Operations

Dear Ms. Colombie: on behalf of the American Chemistry Council (ACC), attached are our comments regarding the Alaska Oil and Gas Conservation Commission's proposed regulation of hydraulic fracturing operations. I thank you in advance for the opportunity to share our views.

Sincerely,

Tim Shestek
American Chemistry Council

Tim Shestek – Senior Director, State Affairs
American Chemistry Council
1121 L St., Suite 609 | Sacramento, CA | 95814
O: 916-448-2581 | F: 916-442-2449

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April 16, 2013

Commissioner Cathy P. Foerster, Chair
Alaska Oil & Gas Conservation Commission
333 W. 7th Avenue, Suite 100
Anchorage, AK 99501
Submitted via email to: jody.colombie@alaska.gov

RE: Regulation of Hydraulic Fracturing Operations

Dear Commissioner Foerster:

On behalf of the American Chemistry Council (ACC), thank you for the opportunity to provide the following comments on the Alaska Oil and Gas Conservation Commission's (AOGCC) proposed regulation of hydraulic fracturing operations.

By way of background, ACC represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care[®], common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is a \$720 billion enterprise and a key element of the nation's economy. It is one of the nation's largest exporters, accounting for ten cents out of every dollar in U.S. exports. Chemistry companies are among the largest investors in research and development. Safety and security have always been primary concerns of ACC members, and they have intensified their efforts, working closely with government agencies to improve security and to defend against any threat to the nation's critical infrastructure.

The chemistry industry is the foundation of U.S. manufacturing and the engine of our National economy. Chemistry creates the basic building blocks for countless products that Americans rely on every day, from the packaging that keeps our food fresher longer to building products that make our homes more energy efficient to materials such as high-tech composites that make our cars, planes, and electronics lighter, stronger and more fuel efficient. In fact, 96% of all manufactured goods made in the U.S.A. rely on chemistry.

ACC supports state-level oversight of hydraulic fracturing. We are committed to transparency regarding the disclosure of the chemical ingredients of hydraulic fracturing solutions, subject to the protection of proprietary information. ACC members have a strong interest in ensuring that access to natural gas reserves through hydraulic fracturing is not unnecessarily constrained.

ACC supports the comments filed by the Alaska Oil and Gas Association regarding chemical disclosure and reporting requirements. We encourage Alaska to establish reporting requirements that are consistent with those disclosures routinely submitted under programs like the Ground Water Protection Council and Interstate Oil and Gas Compact Commission's FracFocus web-based program. State regulations in this area recently enacted in Texas and Colorado could serve as a model for Alaska.



ACC appreciates the opportunity to submit these comments. Should you have any questions or comments, please contact me at 916-448-2581 or tim_shestek@americanchemistry.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Ti Sh", with a long horizontal flourish extending to the right.

Tim Shestek
Senior Director, State Affairs

cc: Commissioner John Norman
Commissioner Dan Seamount
Commissioner Dan Sullivan
Governor Sean Parnell
Kara Moriarty, Alaska Oil and Gas Association
Rachel Petro, Alaska Chamber of Commerce