

**Singh, Angela K (DOA)**

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**From:** Nathan Matthews <nathan.matthews@sierraclub.org>  
**Sent:** Monday, August 05, 2013 2:36 PM  
**To:** Colombie, Jody J (DOA)  
**Cc:** Russ Maddox; Lindsey Hajduk; Pamela.Brodie@sierraclub.org  
**Subject:** comments on AOGCC's revised proposed regulations on hydraulic fracturing  
**Attachments:** AK Regs - Sierra Club Aug 2013 comment.pdf

Ms. Colombie--

Please accept the following comment by Sierra Club regarding AOGCC's revised proposed regulations on hydraulic fracturing.

Thank you,

Nathan Matthews

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August 5, 2013

Alaska Oil and Gas Conservation Commission

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Anchorage, Alaska 99501

Submitted online to [jody.colombie@alaska.gov](mailto:jody.colombie@alaska.gov) and by fax to (907) 276-7542

Re: Proposed regulations on hydraulic fracturing and workover operations:  
20 AAC §§ 25.280, 25.283, and 25.990 (Revised June 2013)

To Whom This Concerns:

The Sierra Club thanks the Alaska Oil and Gas Conservation Commission for this renewed opportunity to comment on the proposed (and now revised) regulations concerning workover operations, hydraulic fracturing, and definitions for hydraulic fracturing applications, operations, and reporting. As explained in the separate comment submitted today by Sierra Club in coalition with Alaska Wilderness League, The Wilderness Society, and others, the revised proposed regulations improve upon the Commission's initial proposal in several ways, although the proposal continues to suffer from various gaps and deficiencies that the Commission must remedy if the Commission is to allow unconventional production in Alaska.

More fundamentally, the Commission still has not addressed the threshold question of whether to allow unconventional production at all. As Sierra Club explained in our April 1, 2013 comment, it should not. There is significant uncertainty regarding the risks presented by hydraulic fracturing and unconventional production. Substantial evidence indicates that unconventional production poses heightened risks to groundwater, surface water, air quality, and regarding induced seismicity.

The Commission should impose a moratorium on unconventional production in Alaska, declining to grant permits to drill where hydraulic fracturing and other unconventional methods will be used, until the science provides a better understanding of these risks and whether they can be managed, and if so, how.

As Sierra Club previously explained, the Commission has an affirmative obligation to protect environmental resources, especially ground water. Allowing unconventional production now risks permanent harm to these resources. Because of the uncertainties regarding hydraulic fracturing, such as the potential for groundwater contamination even in the absence of casing failure, the Commission cannot conclude at this time that *any* hydraulic fracturing can be conducted without imposing an unacceptable risk to Alaska's environment.

Sincerely,

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