

Singh, Angela K (DOA)

From: Colombie, Jody J (DOA)
Sent: Friday, January 17, 2014 10:41 AM
To: Singh, Angela K (DOA)
Subject: FW: Comment on proposed new rule on Hydraulic Fracturing (3rd draft)

From: Ceal Smith [mailto:ceal@theriver.com]
Sent: Thursday, January 16, 2014 10:48 PM
To: Colombie, Jody J (DOA)
Cc: Ceal Smith; Kerry Williams
Subject: Comment on proposed new rule on Hydraulic Fracturing (3rd draft)

Dear Ms. Colombie/AOGCC,

The jury is still out on the controversial practice of high-volume slickwater hydraulic fracturing (“fracking”). EPA studies are still underway but even so, evidence of water, air, soil and atmospheric methane contamination associated with fracking is accumulating. For example, see:

<http://www.usatoday.com/story/money/business/2014/01/05/some-states-confirm-water-pollution-from-drilling/4328859/>

<http://newswatch.nationalgeographic.com/2013/12/20/hormone-disrupting-chemicals-linked-to-fracking-found-in-colorado-river/>

<http://www.youtube.com/watch?v=mSWmXpEkEPg#t=11>

Caution and transparency are needed to ensure Alaska doesn’t repeat the mistakes being made by Pennsylvania, Ohio, West Virginia, Colorado, California and other states where shale gas fracking is underway. We urge the AOGCC to adopt stringent new fracking rules that protect Alaskan ecosystems and peoples right-to-know about toxic fracking fluids used around residences, communities, coastal areas, salmon streams and drinking water sources.

These new rules need to:

- Ban the practice of high-volume slickwater fracking in, or within one mile from marine, coastal and freshwater aquatic environments.
- Where the practice is allowed, require before-and-after water monitoring around each well that is subject to fracturing operations within one mile of a freshwater source.
- Require full disclosure where and when fracking fluids will be used, what toxic constituents the fracking fluids may contain, and what amounts of chemicals will be used before and after fracking operations commence.

- Allow no trade secret exemptions from the requirement to disclose the constituents of fracking fluids prior to or after their use.
- Provide broad public access to fracking-related information, and not rely solely on the problematic FracFocus website to disseminate fracking fluid information to the public.
- Provide landowners adequate notice and opportunity to secure their water rights prior to the use of fracking fluids.

If, as industry says chemicals used in fracking pose no threat to humans or the environment, then they should have no problem disclosing what chemicals are used around our coastal, surface and ground waters. However, in 2011, Congressional Energy and Commerce and Natural Resource Committee members released a report on the types, volumes and chemical content of chemicals commonly used in hydraulic fracturing (available for download here: <http://democrats.energycommerce.house.gov/index.php?q=news/committee-democrats-release-new-report-detailing-hydraulic-fracturing-products>) suggests that, contrary to industry claims, fracking chemicals may pose serious risks. The report found that:

- The 14 leading oil and gas service companies used more than 780 million gallons of hydraulic fracturing products, not including water added at the well site. Overall, the companies used more than 2,500 hydraulic fracturing products containing 750 different chemicals and other components.
- The components used in the hydraulic fracturing products ranged from generally harmless and common substances, such as salt and citric acid, to extremely toxic substances, such as benzene and lead. Some companies even used instant coffee and walnut hulls in their fracturing fluids.
- Between 2005 and 2009, the oil and gas service companies used hydraulic fracturing products containing 29 chemicals that are known or possible human carcinogens, regulated under the Safe Drinking Water Act (SDWA) for their risks to human health, or listed as hazardous air pollutants under the Clean Air Act.
- The BTEX compounds – benzene, toluene, xylene, and ethylbenzene – are SDWA contaminants and hazardous air pollutants. Benzene also is a known human carcinogen. The hydraulic fracturing companies injected 11.4 million gallons of products containing at least one BTEX chemical over the five-year period.
- Methanol, which was used in 342 hydraulic fracturing products, was the most widely used chemical between 2005 and 2009. The substance is a hazardous air pollutant and is on the candidate list for potential regulation under SDWA. Isopropyl alcohol, 2-butoxyethanol, and ethylene glycol were the other most widely used chemicals.
- Many of the hydraulic fracturing fluids contain chemical components that are listed as “proprietary” or “trade secret.” The companies used 94 million gallons of 279 products that contained at least one chemical or component that the manufacturers deemed proprietary or a trade secret. In many instances, the oil and gas service companies were unable to identify these “proprietary” chemicals, suggesting that the companies are injecting fluids containing chemicals that they themselves cannot identify.

Since Alaskans are not empowered to regulate oil and gas operations in their communities, we are entirely dependent upon the AOGCC to protect our health, air, water, fisheries, wildlife and environment. The use of chemicals that could harm these values for generations to come must be disclosed BEFORE drilling is permitted. If a chemical is known to be harmful, or if it has unknown, but potentially harmful effects, it should be banned from use in drilling.

Thank you for considering our comments.

Sincerely,

Ceal Smith and Kerry Williams
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Eagle River, AK 99577