

Singh, Angela K (DOA)

From: Fisher, Samantha J (DOA)
Sent: Friday, April 12, 2013 8:36 AM
To: Singh, Angela K (DOA)
Cc: Colombie, Jody J (DOA)
Subject: FW: Hydraulic Fracturing Regulations

Process

From: Mendivil, Gary A (DEC)
Sent: Thursday, April 11, 2013 3:22 PM
To: Colombie, Jody J (DOA)
Cc: Fisher, Samantha J (DOA)
Subject: Hydraulic Fracturing Regulations

Jody-

Unfortunately I spaced out the deadline for submitting ADEC's comments on AOGCC's hydraulic fracturing regulations. I thought it was next week instead of April 1.

ADEC wanted to submit the following comments

1. The list of analytes required for testing background conditions at 20 AAC 25.283(a)(5) may need to include naturally occurring radioactive materials (NORM), such as uranium, radium, and thorium. Flowback water may contain elevated levels of NORM and without baseline conditions it would not be possible to determine impacts to drinking water aquifers for these materials.
2. The regulations use the term "principles fluids", but it is unclear what fluids are to be included in the pre-notification reports unless the term is defined. 20 AAC 25.283(a)(14)(B) & (C) indicates that "principle fluids" include viscosifiers, acids, or gelling agents, these chemicals represent a sub-set of the fracturing fluids that require post-notification per 20 AAC 25.283(h)(2)(A) in the well sundry report and per 20 AAC 25.283(i) for Fracfocus. Other than the above three chemicals it is not clear which other fluids should be included in the pre-notification reports.