

September 29, 2010

Mr. Edward Hanlon
Designated Federal Officer
EPA Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Dear Mr. Hanlon:

On September 10, 2010, EPA's Science Advisory Board (SAB) released the names of 82 individuals nominated to serve on an *ad hoc* committee charged with providing "independent expert advice on EPA's draft Hydraulic Fracturing Study Plan." As part of that announcement, SAB invited interested parties to submit comments on the composition of that initial pool, and on the standards and criteria that should be used in assembling a first-rate panel capable of applying an objective, scientific eye to the issue at hand.

Consistent with that task, the Independent Petroleum Association of America (IPAA) strongly supports the creation of an advisory panel composed of individuals with strong backgrounds in science and engineering, and a proven ability to execute analysis based on an objective review of scientific data with what SAB's announcement refers to as an "absence of appearance of a lack of impartiality."

Taking a closer look at the pool of nominees presented earlier this month, IPAA is encouraged to see individuals with diverse, well-established technical backgrounds and a wide-range of general talents and experience – from geologists, mathematicians and engineers, to hydrologists, oceanographers and public health professionals. There even appears to be a poet on this list.

Unfortunately, a number of nominees' past comments betray a strong and unambiguous antipathy toward shale development in general, and hydraulic fracturing in particular.

For example, one candidate identified by SAB is the author of a recently released white paper (partially funded by EPA) that cites hydraulic fracturing as a "toxic" process, and then recommends that Congress pass legislation assigning the agency unprecedented authority to regulate it. Another candidate issued a study earlier this year arguing the development of natural gas from wells undergoing fracture stimulation is worse for the environment than the mining of coal – a study so riddled with errors that he was forced to withdraw it within days of its release.

IPAA believes these nominees and several others listed in your document lack the balance needed to evaluate the implications of hydraulic fracturing on drinking water in a credible way, instead opening the results of the study to questions of bias. EPA's willingness to review and consider the pressing concerns regarding the need to safeguard the integrity of this science-based review suggests the panel must withstand the test of balance in its assessments.

EPA's pursuit of its second nationwide study on hydraulic fracturing in the past six years comes at a critical point in the ongoing debate over the nation's energy and economic future. At a time of unprecedented economic uncertainty, the development of clean-burning, American natural gas from shale and other fracturing-dependent reservoirs continues to generate jobs and revenue at a pace that belies the difficult times in which the country finds itself today. At the same time, EPA has an obligation to ensure the process of acquiring those resources is safe, as it did most recently in 2004. Certainly the politics of this issue have changed dramatically since then. EPA's job is to assess whether the science has.

IPAA appreciates the opportunity to present its concerns in the development of the current EPA hydraulic fracturing study. IPAA believes a well structured, scientifically sound assessment of fracturing will once again demonstrate that this essential technology is safe and well regulated in its current framework. Consequently, EPA needs to ensure that its evaluation process remains similarly well structured and scientifically sound.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Russell". The signature is fluid and cursive, with a large initial "B" and "R".

Barry Russell
President and CEO