

Statement Prepared for Delivery

Leslie Beyer, President, Petroleum Equipment & Services Association

Before the Environmental Protection Agency Science Advisory Board

Regarding the Draft SAB Review of the Assessment of the Potential Impacts of Hydraulic Fracturing for Oil and Gas on Drinking Water Resources

June 8, 2016

Dr. Thorne and members of the Science Advisory Board, thank you for the opportunity to provide public comment on the draft SAB review of EPA's Assessment of the Potential Impacts of Hydraulic Fracturing for Oil and Gas on Drinking Water Resources.

My name is Leslie Beyer, and I am President of the Petroleum Equipment and Services Association, also known as PESA. PESA represents approximately 200 companies in the service, supply, and manufacturing sector of the oil and gas industry; our members provide the technology, expertise, and equipment to safely and efficiently develop energy for human and economic progress.

PESA members led the development of hydraulic fracturing, or "HF" as a process to enhance the production of oil and gas during the 1940s and 1950s, and have been improving its effectiveness ever since. The knowledge and experience of PESA members is why EPA turned to some of them for information and subject matter expertise when it first launched the Assessment. Indeed, the HF process has been extensively reviewed by multiple state regulators and numerous scientific experts.

With this record of experience and review, PESA members welcomed the conclusion of EPA's draft Assessment report that the Agency did not find evidence HF has "led to widespread, systemic impacts on drinking water resources in the United States." This conclusion is sound, valid, and supported by EPA's comprehensive review, outside expertise, and published scientific research.

PESA urges the SAB to focus on these scientific analyses as it completes its peer review. The scientific backing for EPA's conclusion has been provided not only in the Assessment report, but also in research studies highlighted by PESA and others. Many of these studies are also referenced in the Dissenting Opinion to the draft SAB review authored by several members of the HF Research Advisory Panel.

In light of this significant level of review, it is concerning that the draft SAB review argues more work is needed because there is a "lack of evidence" of impacts from HF on drinking water. More than two million wells in the US have been stimulated by HF since the process was developed, around half of all wells drilled since 1859. The "lack of evidence" of impacts on drinking water is not due to a deficit of analysis or data. Instead, it is due to the overwhelming evidence that HF does not have widespread systemic impacts on drinking water resources.

Further, it is important that the Assessment report follow the Congressional mandate and focus on cases and activities related to HF. However, a review of the Assessment report and SAB's draft review finds several situations where cases and activities unrelated to HF are addressed, putting the clarity and accuracy of the Assessment report at risk.

For example, the draft SAB review recommends EPA include investigations into drinking water contamination in Dimock, Pennsylvania, Pavillion, Wyoming, and Parker County, Texas when investigations have demonstrated there is no connection between HF and drinking water well issues in those areas. Including results from these unrelated investigations would not advance understanding of impacts to drinking water resources by HF.

Additionally, EPA's Assessment report is broader in scope than HF, potentially creating a misleading impression for the public that HF operations have had an impact on drinking water. To ensure technical clarity, it is important to distinguish which impacts are directly associated with HF. PESA's previous comments outline a number of opportunities for technical clarification, and we hope those points are incorporated as the process moves forward.

When engaging in well development activities, including HF, PESA members and their partners across the industry utilize proven equipment and technologies. They follow industry risk management practices and comply with multilayered federal and state regulatory requirements. These are the reasons behind the draft Assessment Report's conclusion that EPA has not found evidence HF has "led to widespread, systemic impacts on drinking water resources in the United States."

The industry, especially the service, supply, and manufacturing sector, is focused on continuous improvement, both through refining standards and developing innovative technologies. PESA urges the SAB and EPA to fully account for on-going efforts across industry to develop new technologies and improve practices to ensure the Assessment report contains the most up-to-date information.

Further, state regulators are updating regulations, collaborating with industry, and working through partnerships such as the Groundwater Protection Council and the Interstate Oil and Gas Compact Commission to ensure laws are tailored to reflect local conditions and the public has meaningful information through platforms such as FracFocus. States have proven nimble at maintaining regulatory requirements that keep up with technology and best practices, protecting the environment while allowing for development of oil and gas resources.

PESA members are proud of the role they have played in developing technologies and practices, including HF, that have allowed the United States to develop oil and gas resources in an environmentally responsible manner. These achievements would not have been possible without a focus on sound science. We urge the SAB to maintain this focus as it completes its peer review of EPA's draft Assessment report.

Dr. Thorne and members of the SAB, this concludes the comments of the Petroleum Equipment and Services Association. I am glad to answer any questions you may have.