

September 30, 2010

RE: Public Comment at October 1, 2010 PAWG Meeting

I would have liked to attend the PAWG meeting on October 1, 2010 in person but I am working in Rock Springs that day and was unable to change my schedule so I am submitting my comments in writing instead.

Over 1 year ago now, I was asked by the residents of the New Fork Social Club at our annual meeting to investigate how we could test our water to insure that it has not been impacted by the drilling and fracturing that has occurred so near our subdivision. At that time, there were 62 gas well completions within 2 miles of our private water wells. That number has, and will, continue to increase over time. As a member of the BLM Water Task Group, I assured the home owners present at that meeting that there was no evidence of any contamination of our wells based of the ongoing testing as of that date. However, they wanted to conduct testing by an independent lab in order to allay their fears of possible contamination. It was at that point that I informed them that we would need to know what specific chemicals to test for before testing could be done on a practical basis.

At one of your previous PAWG meetings, your group did approve my request that the Operators disclose 2 Creditable/Suitable chemicals contained in fracturing chemicals so that our subdivision could conduct the testing that they wish to conduct. As of this date, we still have not heard from the Operators on which 2 chemicals fit my designated criteria. To reiterate my definition of a "Credible/Suitable" fracking chemical for testing purposes, it should:

1. Not be found to occur naturally, or in other words, it should be a man made chemical.
2. Be one of the chemicals used in a higher concentration in the fracking fluid so that there is a greater likelihood of detecting it if it is present.
3. Have the greatest potential toxicity to humans if ingested or absorbed through the skin even in small amounts over a prolonged period of time.

If the Operators cannot decide to release just 2 chemicals that fit this description, then they should release the entire list to me with the respective concentrations and I will then be able to determine which 2 chemicals our subdivision should be testing for. This would of course take a considerable amount of research on my part, but since I have an undergraduate degree in Chemistry and as a practicing Emergency Physician, I have access to a wealth of Toxicology literature and even Toxicologists with whom I can consult. So I would again ask the PAWG to request that the Operators either give us the names of 2 chemicals that fit my original Creditable/Suitable criteria or the entire list as soon as possible.

I am sure that the Operators and BLM are doing everything possible to insure the safety of the drilling process and have every intention to protect our water. However, as we learned from BP in the Gulf of Mexico, even though they had a disaster response plan to protect even the Walruses, gas and oil exploration doesn't always go as planned.

Respectfully Submitted,

Michael J. Kramer, MD FACEP (Fellow American College of Emergency Physicians)